

Appendix 2:

This appendix annotates the ECC Reg 19 comments in their entirety and shows where the comments have been included in the UDC 'Proposed Modifications' Schedule, that has been published as part of the Submission Local Plan material. The appendix also indicates why the remaining comments have either not been included or that they could be considered for inclusion in the final 'Additional Modifications' Schedule to be prepared in due course. In some instances, a reference is added to 'See Separate Comments' these relate to the comments referred to in Appendix 1.

DRAFT

Appendix 2 – ECC Local Plan Responses: annotated to indicate if included in the UDC Proposed Modifications Schedule

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
Chapter 1 – Introduction						
01	Para 1.11 4 th bullet page 10	N/A	<p>3 - Effective 4 - Consistent with National Policy</p> <p><u>Support but with modification</u> ECC welcomes the reference to delivery of Biodiversity Net Gain but recommends paragraph 1.11, bullet point 4 includes reference to local nature recovery.</p> <p>The Environment Act 2021 introduced a number of measures to support local nature recovery, including Local Nature Recovery Strategies (LNRS). These strategies are locally led and establish priorities for nature recovery. Local authorities have a duty to conserve and enhance biodiversity, and to report on their actions. They must also consider LNRS in their planning decisions and that these are integrated into the planning system to ensure that planning decisions better reflect areas with the greatest potential for nature recovery.</p> <p>ECC's role as Responsible Authority for the Greater Essex Local Nature Recovery Strategy (LNRS) (the draft LNRS is out for consultation 30 August to 25 October 2024). The Greater Essex LNRS aims to deliver practical, county-wide initiatives for nature recovery and identifies areas of current particular importance for biodiversity and opportunity locations where habitat creation or improvement can provide multiple benefits for nature and the environment.</p>	<p>Amend paragraph 1.11, 4th bullet to strengthen reference to "local nature recovery" as follows. <i>"ensure that development makes an appropriate contribution to tackling climate change, delivering Biodiversity Net Gain, local nature recovery and any other planning related..."</i></p>	N	YES UDC 1 (1.11/10)
02	Paras 1.24 and 1.25, page 13	N/A	ECC recommends that UDC prepare a Statement of Common Ground (SOCG) to address the ECC representations particularly where a modification or further evidence is sought. A series of 'additional modifications' have been included throughout the ECC response to the Reg 19 Local Plan which will	<p>For information and UDC action.</p> <p>Update the Duty to Cooperate Statement before Submission of the Local Plan to correctly and fully represent ECC SOCG position with UDC.</p>	Y	<p>Not Related to LP Document.</p> <p>DTC Topic Paper Addendum prepared that makes clear there is currently no SOCG</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>provide clarity in understanding certain points, make factual corrections and/or correct typos etc.</p> <p>UDC should continue to work collaboratively with ECC before submission of the Draft Plan to address all representations, to enable ECC to support UDC at examination and subsequent implementation and delivery of the Local Plan.</p> <p>The <u>UDC Duty to Cooperate Topic Paper, July 2024</u> incorrectly states on page 3 and 42 that a SOCG with ECC has been completed. We are yet to enter into a SOCG. As noted on pp173-174 we provided an 'agreed note' on the SOCG, which states:</p> <p><i>"ECC provided a comprehensive response to the draft Local Plan (Regulation 18) consultation in late 2023, UDC has adopted a large number of these suggestions, either in full, or in part. ECC will review the Regulation 19 Plan to fully understand how these comments have been incorporated. Both Councils have agreed to continue working together to address any outstanding differences post consultation and through the Examination process, where a Statement of Common Ground will be prepared."</i></p> <p>This remains the ECC position to date.</p>			between UDC and ECC although this is ongoing.
Chapter 2 – Spatial Portrait						
03	Para 2.9, page 19	Y	<p>3 - Effective 4 - Consistent with National Policy</p> <p><u>Modification to paragraph 2.9</u></p> <p>ECC support paragraph 2.9 but there are two omissions that should be included in the matters and responsibilities covered by ECC and would ensure consistency with Strategic Objectives 3 and 11.</p> <p>1. ECC (along with UDC) has duties related to specialist and supported housing that addresses the needs of the following</p>	<p>Amend paragraph 2.9 to ensure the role that ECC performs as it relates to adults and children (consistent with Strategic Objective 11), and the Responsible Authority for the Greater Essex Local Nature Recovery Strategy (consistent with Strategic Objective 3) is stated.</p> <p>"The County Council is a key partner in its strategic role for infrastructure and service provision in a two-tier level local government structure. Along with its role as the Highway Authority, Local Transport Authority, Lead Local Flood</p>	N	YES UDC 2 (2.19/19)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally complaint and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<ul style="list-style-type: none"> disabled (physical and/or, sensory impairments), learning disability and autism, mental health, older people, residents leaving institutions such as the care sector, prison, or hospital, survivors of domestic abuse, people who require supported housing due to their homelessness, and children's homes for looked after children". <p>ECC is the Responsible Authority for delivering the Greater Essex Local Nature Recovery Strategy (GELNRS) working closely with the Essex Local Nature Partnership setting the direction and assisting key stakeholders engagement. The LNRS provides the baseline habitat information, generating action to promote biodiversity management and improvement. The LNRS identifies strategic opportunity areas and an information source. This role will identify areas of current importance for biodiversity; strategic opportunity locations for habitat creation and improvement; and off-site biodiversity provision.</p>	<p>Authority, Lead Authority for Education, Minerals and Waste Planning Authority, and Lead Adviser on Public Health, <u>the provision of libraries, and seeks to influence new development to best meet/has statutory responsibilities for Adult Social Care (Care Act 2014) and Children's services (Children Act 1989)</u> it also has responsibilities for Adult Social Care and the provision of libraries. Since 2020, it is also playing a leading role for Essex authorities by delivering the recommendations of the Essex Climate Action Commission <u>and is the Responsible Authority for delivering the Greater Essex Local Nature Recovery Strategy.</u></p>		
04	Para 2.22, page 22	Y	<p>4 - Consistent with National Policy</p> <p>ECC welcomes the reference in bullet point 3 to <i>"improving access to a greater range of sports and cultural facilities particularly for young people"</i>. However, it is felt that accessibility to green spaces is also important in providing communities with outdoor opportunities for physical activity, and to enhance mental health and well-being. It is recommended that the key challenge and opportunities be amended to reflect this opportunity, which the Local Plan seeks to deliver. This would be consistent with Strategic Objective 3.</p>	<p>Amend para 2.22, bullet 3 to read as follows - <i>"improving access to a greater range of sports, green spaces and cultural facilities particularly for young people"</i>.</p>	N	<p>YES UDC 4 (2.22/22)</p>
05	Para 2.27 (bullet 3), page 24	3. N	<p>3 – Effective 4 - Consistent with National Policy</p> <p>ECC is mindful that Hatfield Forest is both SSSI and NNR, supporting an ancient forest mosaic of wood</p>	<p>ECC recommends the paragraph be amended to correctly reference SAMMs rather than SANG.</p>	N	<p>NO No comments received on this matter from National</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>pasture, coppice, old grassland plains and wetlands, that collectively support grassland, woodland, wetland habitat features and notable assemblages of veteran trees, invertebrates, fungi, lichen and breeding birds. Hatfield Forest is arguably unique in a European context as the best example of a mediaeval forest with all elements surviving.</p> <p>It is noted that the current wording includes reference to the SANG scheme, when it should be Strategic Access Management Measures (SAMMs). A Hatfield Forest SAMMs is being developed with Natural England, to develop appropriate mitigation to develop a SAMMs strategy, and a tariff based system to allow financial contributions for providing strategic solutions to this protected site.</p>			Trust or Natural England, although other modifications are made to reflect other comments from these stakeholders.
06	Pages 24 to 27	3. N	<p>3 – Effective 4 - Consistent with National Policy</p> <p>The economic context fails to reference the demand for 'strategic/land hungry uses' such as distribution centres along the M11 / A120 transport corridors. This is inconsistent with other references to such facilities later in the Reg 19 Local Plan and supporting evidence. Examples include paragraph 4.34, which refers to "a lack of industrial supply" within 10 miles of Bishops Stortford and "additional supply is needed, particularly close to M11 Junction 8"; and section 5.67 within the evidence base - Employment Needs Update 2023, which refers to the area within five miles of London Stansted Airport.</p>	Amend the economic context (pages 24 to 27) to include reference to the demand for strategic uses such as distribution centres along the M11 / A120 transport corridors, consistent with later references in the Reg 19 Local Plan and the local plan evidence base as it relates to employment needs. This would also be consistent with Strategic Objective 8.	N	YES UDC 9 (2.32/26)
	Para 2.40	N/A	<p>Amendment/Clarification.</p> <p>ECC seeks clarification to improve interpretation of statistical information presented within this paragraph in the Reg 19 Local Plan.</p>	UDC to clarify the statement - "38.0% owning two or more cars". Is this statement referring to households or individual adults? Furthermore the source of the information should also be stated.	N	YES UDC 10 (2.40/28)
07	Para 2.41, page 28 Para 2.43, page 29	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC as the lead advisor on Public Health welcomes the reference to health within paragraph 2.41, but it</p>	1. Amend paragraph 2.41 to include current information from the Essex Joint Strategic Needs Assessment (2022) (e.g. inclusion of the obesity profile, physical activity,	N	1. Additional detail unnecessary – provides high-level overview only.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>must be strengthened, with reference to local evidence and current data. This point was made at the Regulation 18 stage and would strengthen the link between planning and health. Note that the NPPF para 96 states <i>"enable and support healthy lifestyles, especially where this would address identified local health and well-being needs"</i>.</p> <p>Furthermore, for consistency throughout the Local Plan, the paragraph must be amended to reflect the objective of Core Policy 66: Planning for Health, to link with the Essex Joint Strategic Needs Assessment (JSNA) and the Uttlesford Health and Well Being Strategy.</p> <p>The JSNA is prepared in collaboration with local authorities and the NHS to assess current and future health, care and wellbeing needs of the local community informing decisions. It is therefore important that Local Plan policy seeks to address known identified needs.</p> <p>In reviewing the information presented it is acknowledged that the 'Key Challenges/Opportunities' (para 2.43) must be strengthened to ensure health needs (not just health facilities and services) of the future community within Uttlesford are appropriately addressed. This will ensure a consistent approach to the NPPF and the Uttlesford Health and Wellbeing Strategy and link to the proposed Core Policy 66: Planning for Health. It would also reflect the representation made at the Regulation 18 consultation stage.</p>	<p>income/deprivation factors which have an impact on health).</p> <p>2. Amend the key challenges and opportunities to reflect those articulated within the Uttlesford Health and Wellbeing Strategy, in order to demonstrate a consistent approach between health and wellbeing strategies and Local Plans.</p> <p>3. Amend paragraph 2.22 to strengthen reference to health by adding an additional bullet point, and the suggested wording is – <u>"Addressing the wider determinants of health and areas of deprivation that cause inequalities within our communities."</u></p>		<p>2. Unnecessary / existing text sufficient.</p> <p>3. YES UDC 5 (2.22/22)</p>
Chapter 3 – Spatial Vision and Objectives						
08	Spatial Vision (Economic), page 33	3. Y	<p>2 - Consistent with National Policy</p> <p>To ensure consistency with the NPPF, ECC recommends that the vision be amended to ensure the rural economy needs are appropriately addressed within the Local Plan. The rural economy within Uttlesford provides diverse employment opportunities for the Uttlesford and wider economy,</p>	Amend the economic section of the vision be amended to acknowledge and show an appreciation of the role the rural economy performs within Uttlesford, and that in developing the Local Plan, consideration has been given to its important role for the local and regional economy.	N	NO Existing text sufficient.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>within agriculture and tourism. ECC draws attention to para 88 (a to c) of the NPPF which states "Planning policies and decisions should enable:</p> <ul style="list-style-type: none"> a. the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings; b. the development and diversification of agricultural and other land-based rural businesses; c. sustainable rural tourism and leisure developments which respect the character of the countryside; 			
Chapter 4 – Spatial Strategy						
09	Fig 4.1, page 38 (North Uttlesford)	3. N	<ol style="list-style-type: none"> 1. Positively Prepared 2. Justified 3. Effective 4. Consistent with National Policy <p>The Local Plan states that growth at Saffron Walden delivers: 'appropriate services and facilities, including additional capacity for the existing secondary school'.</p> <p>Saffron Walden County High School is the largest secondary school in terms of pupil numbers (including 6th form) in Essex. The Local Plan does not provide any additional land at the high school; and the Audley End Road campus has significant known constraints. Expansion, commensurate to the proposed level of housing growth, may not be achievable and/or have significant disbenefits. UDC have not provided any evidence to support how the Local Plan would deliver 'additional capacity' at the school.</p> <p>ECC also notes reference in the IDP to the school's expansion, which states "This will include sufficient capacity for the relocation of the nursery from Saffron Walden County High School to allow for expansion of secondary facilities".</p>	<ol style="list-style-type: none"> 1. Amend Figure 4.1 'North Uttlesford', 2nd bullet to read as follows. <ul style="list-style-type: none"> • Growth at Saffron Walden will complement the existing settlement, forming high-quality sustainable development, well connected to the wider settlement, providing appropriate services and facilities, including additional capacity for the existing secondary school. 2. Amend the IDP and delete from page iii "This will include sufficient capacity for the relocation of the nursery from Saffron Walden County High School to allow for expansion of secondary facilities" 	Y	See separate comments.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>ECC does not seek the relocation of the early years and childcare (EYCC) facility at Saffron Walden County High and the space freed would not be sufficient to materially overcome site constraints that militate against expansion. A new EYCC facility is needed in addition to the existing facility, adding extra capacity rather than relocating it.</p> <p>ECC will continue to work with local schools and Academy Trusts (with UDC) to ensure sufficient suitable school places are available across the district. The NPPF highlights the importance of collaborative working to resolve matters in relation to the delivery of schools and other community infrastructure, as para 100 states <i>"To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues"</i>.</p>			
10	Para 4.8	3. N	<p>3 - Consistent with National Policy</p> <p>ECC recommends that the key challenges acknowledge the ambition to reduce the reliance on the private car, which is consistent with DfT and NPPF policy to promote public transport and active travel use. This would also align with the Local Plan's vision and Strategic Objective 12. This will significantly contribute towards the Net Zero goal. ECC appreciates that the design of new and existing developments can assist in making this a reality.</p>	<p>Include an additional bullet point in paragraph 4.8 as follows -</p> <ul style="list-style-type: none"> • <i>"Reducing the reliance on the private car, by delivering opportunities for accessibility to active travel modes and public transport"</i>. 	N	YES UDC 12 (4.8/41)
11	Page 41 – Responding to Climate Change	Support	<p>3 - Consistent with National Policy</p> <p>ECC welcome the approach taken in the Local Plan to addressing climate change. The inclusion of an overarching policy to address climate change mitigation and adaptation and that sits across the Local Plan is fully supported, but modifications are</p>	The climate change policies are welcome but modifications are sought to ensure effectiveness and consistency with national policy, as detailed within the ECC response to specific policies.	Y	N/A

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>sought to the policy for clarity which are detailed within the ECC response.</p> <p>Climate impacts almost every aspect of the local plan and by setting out an overarching Climate Change policy upfront, it helps provide clarity and direction of what is expected from new development proposals and it enables more detailed policies to be 'signposted'.</p> <p>An overarching climate policy accords with best practice advice set out in the TCPA/RTPI <u>Climate Crisis Guide</u> (Para 3.3.1) and it provides some flexibility and 'future proofing' of the local plan – for example there are climate impacts that we may not yet know about.</p>			
12	Footnotes 39 and 40, page 42	Correction required	<p>Correction Required</p> <p>Weblink correction required for referencing purposes.</p>	<p>Correction required as follows.</p> <ol style="list-style-type: none"> 1. Update weblink in Footnote 39 on page 42 as it is broken. Footnote 39 - The link to the webpage hosting the Essex Legal Advice is: https://www.essexdesignguide.co.uk/climate-change/essex-net-zero-evidence/essex-open-legal-advice-energy-policy-and-building-regulations/ 2. Footnote 40 - the weblink to the document itself is: updated-open-advice-re-energy-policy-building-regs-26-2-24-final.pdf (essexdesignguide.co.uk) 	N	<p>YES</p> <p>UDC 13 (Footnotes 39 and 40/ 42)</p>
13	Para 4.16, page 43 – Climate Change and Sustainability Statement	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC support the requirement for a Climate Change and Sustainability Statement (CCSS) as outlined in Core Policy 1 and setting out expectations for what it must incorporate as listed in para 4.16 and Appendix 10 of the Reg 19 Local Plan.</p>	<ol style="list-style-type: none"> 1. Amend the bullet points in paragraph 4.16 to ensure they align with those listed in Appendix 10. 2. Include an additional sentence in para 4.16 as follows. <i>"Other matters may need to be addressed in a CCSS, where</i> 	N	<ol style="list-style-type: none"> 1. Is this a formatting point? Can be addressed in 'Additional Modifications' if necessary. 2. Can we considered as

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>ECC recommends that to ensure the guidance set out within the Local Plan is justified as stipulated within the NPPF (para 35), and therefore consistent with evidence, the bullets within para 4.16 must accurately reflect the topics listed in the CCSS requirements table as shown in Appendix 10 of the Reg 19 Local Plan. Currently, some topics are listed in Appendix 10 and not in the bullet list.</p> <p>A sentence should also be included in para 4.16 which allows for additional matters to be included in a CCSS where these are considered appropriate by the local planning authority. This would help future proof the CCSS to be able to cover future climate impacts that are currently unknown or are only relevant to a specific circumstance or geographic area.</p>	<u>considered appropriate by the Local Planning Authority."</u>		part of ongoing process.
14	Page 43 – Climate Change & Sustainability Statement	Corrections required	<p>Modification and corrections</p> <p>ECC supports and welcomes the holistic approach to climate change and sustainability which is facilitated through the requirement for applicants to submit a Climate Change and Sustainability Statement (CCSS) which references both national and local (including Essex Climate Action Commission) targets and addresses the issues listed in the requirements table in Appendix 10 of the Reg 19 Local Plan.</p> <p>ECC also supports the requirement for a specific Energy Assessment to be provided to demonstrate specific compliance with the net zero operational carbon Core Policy 22.</p> <p>ECC considers that for consistency in approach, an additional sentence be inserted at the end of para. 4.15 which clarifies that an energy assessment can be presented within the CCSS or as a standalone document (as per para 9.23).</p>	<p>1. Insert an additional sentence at the end of paragraph 4.15, stating, <u>"The energy assessment may be presented as a section within a CCSS or as a standalone document"</u>.</p> <p>Corrections required</p> <p>2. Page 43 final sentence 'Note'. The wording needs to be amended. The net zero spreadsheet needs to be referred to as 'Essex Net Zero Spreadsheet' not Essex County Council - as the work has been a collaboration between all Essex Authorities and is not an Essex County Council 'owned' document).</p> <p>3. Insert an additional sentence to this section to reflect para 9.23 which clarifies that the Energy Strategy and/or Essex Net Zero Spreadsheet can either be standalone</p>	N	<p>1. YES UDC 14 (4.15/43)</p> <p>2. YES UDC 15 (4.16/43)</p> <p>3. CHECK</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				documents or form a section in the CCSS. Wording as follows. <i>"The energy assessment can be presented within the CCSS or as a standalone document"</i>		
15	Core Policy 1 – Addressing Climate Change	3. N	3. Consistent with national policy Core Policy 1 covers a range of issues, some of which relate to policies later in the Local Plan but one omission is a point directly relating to Core Policy 22 which requires new homes and buildings to be fossil fuel free, highly energy efficient and achieve 'net zero carbon' from the outset by generating renewable energy to match demand. While Core Policy 1, point vi refers to Core Policy 22, it is quite narrow in its scope and states "accelerating the expansion of renewable and low carbon energy generation within the District". Core Policy 22 is wider and its aims are missing in Core Policy 1. The NPPF emphasises "taking into account the extent to which they [policies] are consistent with relevant strategic policies for the area" (para. 36). This is important as it is one of the most significant ways the Local Plan is mitigating climate change and must be included within the overarching policy.	Amend Core Policy 1 to include the new point as follows: <ul style="list-style-type: none"> <i>Delivering fossil fuel free, highly energy efficient, healthy homes and buildings which are 'net zero' carbon (in operation) from the outset as renewable energy generation matches average annual energy demand (with reference to Core Policy 22: Net Zero Operational Carbon Development)</i> 	Y	NO Unnecessary duplication. Already covered by CP22.
16	Footnote 45, page 59	Correction required	The weblink provided in the footnote is incorrect and must be updated.	Correction required Update weblink in Footnote 45 on page 59 as it is broken. The link to the webpage is: https://www.essex.gov.uk/sites/default/files/2024-07/Developers%20Guide%202024.pdf	N	YES UDC 21 (Footnote 45/ 59)
Chapter 5 – North Uttlesford Area Strategy						
17	Para 5.10, page 64	3. N	1. - Positively prepared 3 - Effective 4 - Consistent with National Policy Paragraph 5.10 states -	Amend paragraph 5.10 as follows: 1 st bullet point <ul style="list-style-type: none"> the provision of both a new primary school (expected to be three form entry3ha) and secondary provision (expansion 	Y	See separate comments.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>"the provision of both a new primary school (expected to be three form entry) and secondary provision (expansion of the existing secondary school) in Saffron Walden".</i></p> <p>The Local Plan references to school size need to be consistent with the ECC Developers' Guide to Infrastructure Contributions to ensure that reference to any development of a school does not refer to forms of entry and instead refers to land size in hectares. The precise forms of entry are determined by ECC as Education Authority in due process, not within Local Plan making. This is consistent with the approach taken in other Local Plans found sound and adopted by other Essex local planning authorities, thereby setting land values and providing certainty over the areas needed to make the plan sound.</p> <p>For the Saffron Walden primary school, ECC has articulated within previous views supplied to UDC, that 3 ha must be allocated to provide for effective primary education provision within Saffron Walden. This land size is consistent with the Developers' Guide, provides contingency and is an example of good spatial planning for the locality.</p> <p>Saffron Walden County High School (Secondary education) is the largest secondary school in terms of pupil numbers (including 6th form) in Essex. The Local Plan does not provide any additional land for expansion and the Audley End Road campus has significant constraints. Expansion, commensurate to the proposed level of housing growth, may not be achievable on site and/or have significant disbenefits. UDC have not provided any evidence to support how the Local Plan would 'provide for expansion'.</p>	<p>of the existing secondary school in Saffron Walden)</p>		
18	Para 5.13, page 65	3. N	<p>1. - Positively prepared 3 - Effective 4 - Consistent with National Policy</p>	Amend paragraph 5.13 to delete wording as follows:	Y	See separate comments.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>Paragraph 5.13 states -</p> <p><i>“Development at Saffron Walden provides an opportunity to provide new education facilities with a new primary school that will provide for some of the recently committed development as well as the newly proposed allocation, along with facilitating an expansion of the existing secondary school in the town (Saffron Walden County High School). The secondary school here is already the largest in the District, but expansion helps to prevent the need for pupils to travel further afield.”</i></p> <p>Saffron Walden County High School (Secondary education) is the largest secondary school in terms of pupil numbers (including 6th form) in Essex. The Local Plan does not provide any additional land for expansion and the Audley End Road campus has significant constraints. Expansion, commensurate to the proposed level of housing growth, may not be achievable on site and/or have significant disbenefits. UDC have not provided any evidence to support how the Local Plan would 'provide for expansion'.</p>	<p><i>“Development at Saffron Walden provides an opportunity to provide new education facilities with a new primary school that will provide for some of the recently committed development as well as the newly proposed allocation, along with facilitating an expansion of the existing secondary school in the town (Saffron Walden County High School). The secondary school here is already the largest in the District, but expansion helps to prevent the need for pupils to travel further afield.”</i></p>		
19	Para 5.20, page 67	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC acknowledges the strategic employment importance of Great Chesterford Research Park, and its current and future international investment potential. It is appreciated that the Great Chesterford Research Park is located within an isolated part of Essex.</p> <p>Evidence suggests that the dominant mode for employee travel is the private car. ECC are mindful that there are existing challenges to enhancing the bus accessibility and use for employees, as it is understood that buses are unlikely to detour into the very long cul-de-sac. Furthermore the typology</p>	<p>Amend paragraph 5.20 to include the following text: <u>“Any future growth at Great Chesterford Research Park must provide contributions to increase active and public transport use and accessibility on site”.</u></p>	Y	<p>NO</p> <p>Unnecessary duplication. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>of the landscape in the locality, means that cycling requires travel up a long incline.</p> <p>Given that Great Chesterford Research Park is a strategic employment site within Uttlesford and to be consistent with Strategic Objective 12 of the Reg 19 Local Plan and the NPPF which states –</p> <p><i>“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.... opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”</i> (para 109).</p> <p>ECC recommends that growth at Great Chesterford Research Park must be predicated on increasing sustainable modes penetration into the development, especially public transport. This would support the transport measures outlined in the Appendix 2B -Chesterford Research Park, Site Development Templates.</p>			
20	Core Policy 6, page 69	3. N	<p>1. - Positively prepared 3 - Effective 4 - Consistent with National Policy</p> <p>Local Plan growth requires the provision of new education facilities – schools and early years and childcare facilities. The Local Plan does not clearly allocate new education sites within the core policies. It is noted that reference to new schools is included within the 'site templates' in Appendix 2-4 of the Reg 19 Local Pan but requirements should be clearly stated within the relevant core policy locality strategy.</p> <p>The NPPF states – <i>“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive,</i></p>	<p>Amend Core Policy 6 to include the following. <u>“Land will be allocated for education and childcare use for a new primary school (Use Class F1 (a)) with co-located early years and childcare nursery (Use Class E(f)) on 3 hectares of suitable land in ‘South East Saffron Walden’.</u></p>	y	<p>NO</p> <p>Unnecessary duplication. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</i></p> <ul style="list-style-type: none"> <i>a. give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and</i> <i>b. work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted" (para 99).</i> <p>To ensure there is sufficient choice for school places in the future, ECC recommends that the policy be amended to be consistent with the ECC Developers' Guide to Infrastructure Contributions which states <i>"In line with DfE guidance, additional land for expansion of new school sites should be safeguarded and alternative uses should be precluded thus enabling ECC to purchase such sites at the intended education use value" (Section 4.4 (para 2)).</i></p> <p>This policy needs to be amended to include the allocation of land for education use (consistent with the approach taken in other Local Plans found sound and adopted by other Essex local planning authorities), thereby setting land values and providing certainty over the areas needed to make the plan sound.</p>			
21	Core Policy 6, page 69	3. N	<p>4. Consistent with National Policy</p> <p>The purpose of this policy is to ensure alignment of growth with infrastructure delivery. Great Chesterford Research Park is an existing and future economic opportunity for UDC and the wider region. It is located within an isolated part of Essex.</p> <p>Evidence suggests that the dominant mode for employee travel is the private car. ECC is aware of existing challenges to enhancing the bus accessibility and use for employees, e.g. buses are unlikely to detour into the very long cul-de-sac, and</p>	<p>Amend Core Policy 6 to include the following: <u>"Any future growth at Great Chesterford Research Park must provide contributions to increase active and public transport use and accessibility on site"</u>.</p>	y	<p>NO</p> <p>As above. Unnecessary duplication. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>the typology of the landscape in the locality, means that cycling requires travel up a long incline.</p> <p>Accepting and welcoming that Great Chesterford Research Park is a strategic employment site within Uttlesford. It is imperative emerging Local Plan be consistent with the NPPF. The NPPF states that –</p> <p><i>“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.... opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”</i> (para 109).</p> <p>To be in alignment with national policy growth at Great Chesterford Research Park must be predicated on increasing sustainable modes penetration into the development, especially public transport. This would support the transport measures outlined in the Appendix 2B -Chesterford Research Park, Site Development Templates.</p>			
22	Para 5.14 (Page 65) Figure 5.2 (page 70) Para 5.23 (page 71)	3. N	<p>3 - Effective</p> <p>Figure 5.2 and the paragraphs cited refer to a 'multi-modal transport corridor', and the figure 5.2 provides an appreciation of the routeing for such corridor shown as "vehicle access" in the key. ECC are the Highway Authority and acting in this capacity will determine the precise routeing and design of such corridor, in consultation with relevant applicant(s) and the Local Planning Authority. The illustrative nature of the 'vehicle access' and this transport corridor needs to be clearly stated as indicative.</p> <p>In determining the precise routeing of the proposed B-road consideration must be given to national and County Highway policy including:</p>	Amend the key for Figure 5.2 to state – <i>“Vehicle Access – for illustrative purposes ONLY”</i>	Y	NO Unnecessary duplication. Already clearly annotated as indicative and illustrative.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<ul style="list-style-type: none"> Essex Design Guide – See sections on <u>Character and Speed</u>. Essex Design Guide – <u>Highways Technical Manual</u>. Department for Transport – <u>Manual for Streets – Para 6.3.16 – 6.3.19</u>. 			
23	Para 5.23, 3 rd bullet, page 71	3. N	<p>1. - Positively prepared 3 - Effective 4 - Consistent with National Policy</p> <p>The Local Plan references to school size need to be consistent with the ECC Developers' Guide to Infrastructure Contributions. Ensuring that reference to any development of a school does not refer to forms of entry and instead refers to land size in hectares. The precise forms of entry are determined by ECC as Education Authority in due process, not within Local Plan making.</p> <p>For the Saffron Walden primary school, ECC has articulated within previous views supplied to UDC, that 3ha must be allocated to provide for effective primary education provision within Saffron Walden. This is consistent with the Developers Guide, provides contingency and would be an example of good spatial planning for the locality.</p> <p>This section of the Local Plan currently states <i>'a new primary school (expected to be three form entry) and facilitating expansion of the existing secondary school'</i>. This must be amended.</p> <p>Saffron Walden County High School is the largest secondary school in terms of pupil numbers (including 6th form) in Essex. The Local Plan does not provide any additional land for expansion and the Audley End Road campus has significant constraints. Expansion, commensurate to the proposed level of housing growth, may not be achievable and/or have significant disbenefits. UDC have not provided any evidence to support how the Plan would 'facilitate expansion'.</p>	<p>1. Amend paragraph 5.23, 3rd bullet to read as follows.</p> <ul style="list-style-type: none"> a new primary school (expected to be three form entry) and facilitating expansion of the existing secondary school <p>i.e. Delete: <i>'(expected to be three form entry)'</i> and delete: <i>'and facilitating expansion of the existing secondary school'</i>.</p>	Y	NO. As above. See separate comments.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
24	Para 5.23, 4 th bullet, page 71	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC draws attention to the <u>Childcare Act 2006</u>, which gives ECC the statutory authority to ensure there is sufficient high quality and accessible early years and childcare places within the local area. Section 6 of the Act defines 'sufficient childcare' as sufficient to meet the requirements of parents in the area who require childcare in order to enable them to take up, or remain in, work or undertake education or training which could reasonably be expected to assist them to obtain work. Unlike education, parents can choose to access childcare away from their home area, for example near to a place of work or training.</p> <p>The ECC Developers' Guide to Infrastructure Contributions makes it clear that ECC "<i>publishes Childcare Sufficiency Assessments, Area Action Plans and the Early Years and Childcare 5-year plan, which details where places are required across the county</i>" (page 29). It also highlights that consideration should be given to the delivery of Early Years and Childcare facilities within Local Plans. It is important that reference is given to the role of 'childcare' and that is referenced in emerging policies, as there is a difference in terminology to 'early years'.</p> <p>Reference needs to be given to '<u>early year and childcare (EYCC)</u>' - on its own "early years" may be interpreted as a reception class in a school, whereas early years and childcare (EYCC) refers to full childcare provision for children aged 0-19.</p>	<p>Amend paragraph 5.23, 4th bullet to read as follows.</p> <ul style="list-style-type: none"> appropriate early years <i>and childcare</i> provision 	Y	<p>YES UDC 27 (5.23/71)</p>
25	Core Policy 6a Table 5.3	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC note the 300 dwelling non-strategic housing requirement identified for Newport that will be</p>	Amend Core Policy 6a to ensure transportation and highway matters are stated as considerations that must be addressed as part of the Neighbourhood Plan, any masterplanning process and planning	Y	<p>NO Unnecessary duplication of national policy.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>delivered through additional Neighbourhood Plan allocations.</p> <p>A key issue for these allocations will be the impact of development on the highway network, required mitigation measures and the need to deliver sustainable and active modes.</p> <p>The "Uttlesford Transport Study, Pre Reg 19 Model Outputs: Newport & Thaxted, 29 February 2024" provides high level modelling for development proposals in Newport (assigned flows from the strategic model). Section 3.7 provides a 'Summary and Conclusions' and states in paragraph 3.7.6 -</p> <p><i>"In this respect, detailed assessments will be required when these sites are brought forward to identify potential mitigation in each location. Applying more nuanced demand reductions to the trip generation matrices which underpin the modelling to reflect the proximity of bus and rail travel choices will help provide further understanding in terms of the impacts on the highway network of the sites in Newport."</i></p> <p>ECC as Highways and Transportation Authority seeks an amendment Core Policy 6a to ensure transportation and highway issues are addressed as part of the Neighbourhood Plan, master planning process and/or planning applications for Newport. At this stage it is unclear what interventions may be required and additional modelling is likely to be needed.</p> <p>Including this requirement in Core Policy 6a will support Local Plan Core Policy 1 (bullet i) which seeks to ensure the location and layout of development will assist in the delivery of sustainable travel infrastructure, and the policy provisions set out in Core Policy 26 the overarching</p>	<p>applications for Newport. Include an additional paragraph, as follows -</p> <p><u>"A key consideration is transportation, reducing impacts on the highway network and delivering sustainable and active modes. The Neighbourhood Plan, any masterplanning process and planning applications are to have regard to the "Uttlesford Transport Study, Pre Reg 19 Model Outputs: Newport & Thaxted, 29 February 2024" and liaise with Essex County Council as the Highway Authority to determine modelling requirements and ensure appropriate mitigation measures including the need to deliver sustainable and active modes".</u></p>		

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			sustainable travel policy. Furthermore the NPPF states – <i>“Planning policies and decisions should support development that makes efficient use of land, taking into account... the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use”</i> (paragraph 128).			
26	Core Policy 7, page 74	Correction required	The reference to the Essex Local Transport Plan needs to be correctly referenced. The last paragraph in Core Policy 7 states: <i>“The package may be further refined through development of the Local Transport and Connectivity Plan 4 being developed by Essex County Council.”</i>	CORRECTION REQUIRED: Amend the last paragraph in Core Policy 7 to read as follows: <i>“The package may be further refined through the preparation development of the <u>new</u> Local Transport and Connectivity Plan 4 being developed by Essex County Council.”</i> i.e. delete development, and Connectivity, 4	N	Not included in the 'Proposed Modifications' Schedule, but no objection to considering for a future iteration of the schedule.
Chapter 6 – South Uttlesford Area Strategy						
27	Para 6.10 page 82	3. N	3 - Effective 4 - Consistent with National Policy ECC draws attention to the <u>Childcare Act 2006</u> , which gives ECC the statutory authority to ensure there is sufficient high quality and accessible early years and childcare places within the local area. Section 6 of the Act defines 'sufficient childcare' as sufficient to meet the requirements of parents in the area who require childcare in order to enable them to take up, or remain in, work or undertake education or training which could reasonably be expected to assist them to obtain work. Unlike education, parents can choose to access childcare away from their home area, for example near to a place of work or training.	Amend paragraph 6.10, 2 nd bullet to read as follows. <ul style="list-style-type: none">“...There will also be a new primary school (including early years <u>and</u> <u>childcare</u> provision”	Y	YES UDC 34 (6.10/82)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>The ECC Developers' Guide to Infrastructure Contributions makes it clear that ECC "publishes Childcare Sufficiency Assessments, Area Action Plans and the Early Years and Childcare 5-year plan, which details where places are required across the county" (page 29). It also highlights that consideration should be given to the delivery of Early Years and Childcare facilities within Local Plans.</p> <p>Reference needs to be given to '<u>early year and childcare (EYCC)</u>' - on its own "early years" may be interpreted as a reception class in a school, whereas early years and childcare (EYCC) refers to full childcare provision for children aged 0-19.</p>			
28	Para 6.13, page 83 Para 6.22, page 88	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC draws attention to the <u>Childcare Act 2006</u>, which gives ECC the statutory authority to ensure there is sufficient high quality and accessible early years and childcare places within the local area. Section 6 of the Act defines 'sufficient childcare' as sufficient to meet the requirements of parents in the area who require childcare in order to enable them to take up, or remain in, work or undertake education or training which could reasonably be expected to assist them to obtain work. Unlike education, parents can choose to access childcare away from their home area, for example near to a place of work or training.</p> <p>The ECC Developers' Guide to Infrastructure Contributions makes it clear that ECC "publishes Childcare Sufficiency Assessments, Area Action Plans and the Early Years and Childcare 5-year plan, which details where places are required across the county" (page 29). It also highlights that consideration should be given to the delivery of Early Years and Childcare facilities within Local Plans. It is important that reference is given to the role of 'childcare' and</p>	<p>1. Amend para 6.13 to read – "<i>...with well-connected green infrastructure, Early Years and Childcare (EYCC), access...</i>"</p> <p>2. Amend para 6.22 to read – "<i>This will be in association with Early Years and Childcare provision...</i>".</p>	Y	<p>1. YES UDC 36 (6.13/83)</p> <p>2. YES UDC 40 (6.22/88)</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			that is referenced in emerging policies, as there is a difference in terminology to 'early years'.			
29	Para 6.14 – Housing (and para 7.14)	3. N	<p>3. Effective</p> <p>4. Consistent with National Policy</p> <p>ECC, with its responsibilities under the <u>Care Act 2014</u>, is concerned that this section is not compliant with NPPF para 63 (page 17) and national planning practice guidance.</p> <p>Para 6.14 states “over a third of new housing will be affordable and available in different tenures with additional specialist housing and supported housing more suited to older people and those who wish to rent”.</p> <p>The wording seeks to address housing provision and the need for older persons only. National policy highlights that needs and provision of housing must address the needs of other cohorts. Specialist and supported housing (SSH) is needed to meet the housing needs of a wide variety of residents with different housing needs across all ages, including looked after children. The need for SSH housing should include, but not limited to, the following people living with/who are -</p> <ul style="list-style-type: none"> • disabled (physical and/or, sensory impairments), • learning disability and autism, • mental health, • older people, • residents leaving institutions such as the care sector, prison, or hospital, • survivors of domestic abuse, • people who require supported housing due to their homelessness, and • children’s homes for looked after children. <p>Paragraph 6.14 needs to be revised to be consistent with the following –</p>	<p>Amend para 6.14 to ensure that “specialist and supported housing” within Uttlesford addresses the needs of the following “including, but not limited to, the following people living with/who are –</p> <ul style="list-style-type: none"> • disabled (physical and/or, sensory impairments), • learning disability and autism, • mental health, • older people, residents leaving institutions such as the care sector, prison, or hospital, • survivors of domestic abuse, • people who require supported housing due to their homelessness, and • children’s homes for looked after children”. <p>To support this amendment the definition of “supported housing” in the glossary should be updated and consideration given to the policy references within the justification and reflected within the evidence base to support the Local Plan.</p>	Y	<p>NO</p> <p>Unnecessary detail. Could potentially be added to Glossary.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>National Guidance and Policy</p> <ul style="list-style-type: none"> Care Act 2014 NPPF (para 63) (both 2023 and draft 2024 version) May 2023 Minister of Housing Statement - making it clear that <i>"the planning system should not be a barrier to providing homes for the most vulnerable children in society."</i> The statement noted that <i>"Local planning authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area"</i>. <p>County Policy/Guidance</p> <ul style="list-style-type: none"> ECC Developers' Guide to Infrastructure Contributions (Appendix J) EPOA's Essex Design Guide / Ageing Population ECC Extra Care Design Guide 2023 ECC Supported Living Accommodation Standards ECC Design Guide for LD Complex Needs Accommodation for Adults with Disability 			
30	Core Policy 10	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC acknowledges that the NPPF states – <i>"It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</i></p> <ol style="list-style-type: none"> <i>give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and</i> <i>work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted"</i> (para 99). 	<p>Amend Core Policy 10 to include the following. <u>Land will be allocated for education and childcare use for:</u></p> <ul style="list-style-type: none"> <u>a new primary school (Use Class F1 (a)) with co-located early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land at North East Great Dunmow</u> <u>a new all through school (Use Class F1 (a)) for primary and secondary with co-located early years and childcare nursery (Use Class E(f)) on 14.5 hectares of suitable land at East of Takeley</u> 	Y	<p>NO</p> <p>Unnecessary duplication. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>To ensure there is sufficient choice for school places in the future, ECC recommends that the policy be amended to be consistent with the ECC Developers Guide for Infrastructure Contributions which states <i>"In line with DfE guidance, additional land for expansion of new school sites should be safeguarded and alternative uses should be precluded thus enabling ECC to purchase such sites at the intended education use value"</i> (Section 4.4 (para 2)).</p> <p>Core Policy 10 is a strategic policy for the South Uttlesford Area. It is appreciated that this policy aims to deliver a balance of <i>'housing, employment and a range of infrastructure'</i>. With this in mind it must be amended to include the allocation of land for education use, thereby setting land values and providing certainty over the areas needed, assisting the delivery and viability of the spatial strategy for this area, making the plan sound.</p> <p>ECC also draws attention to the Childcare Act 2006, which gives ECC the statutory authority to ensure there is sufficient high quality and accessible early years and childcare places within the local area. This policy must be amended to ensure reference to Early Years and Childcare facilities. Also to ensure consistent with the Developers Guide for Infrastructure which states that <i>"Larger development proposals (upwards of 250 dwellings) are most likely to trigger the need for a new facility and in such circumstances a land contribution will also be required"</i> (page 30). In addition to the collocated EYCC facility, ECC also requires land for a 72 place EYCC facility.</p>	<ul style="list-style-type: none"> <u>appropriate land for early years and childcare nursery (Use Class E(f)) to accommodate 72 places in addition to the requirements on the new school site.</u> 		
31	Figure 6.2 Figure 6.3 Core Policy 10 and Core Policy 10a	3. N	<p>3 - Effective</p> <p>Figure 6.2 fails to show that there are two Scheduled Ancient Monuments within the Church End area.</p> <p>The southern Scheduled Ancient Monument sits within the development area (although green open</p>	<p>1. Amend Figure 6.2 as follows –</p> <ul style="list-style-type: none"> Insert an 'orange triangle' in the key labelled <i>'heritage asset'</i> the same as figure 6.3. Insert two triangles showing the southern and northern Scheduled Ancient Monuments – to reflect the mapped information supplied to UDC 	Y	<p>1 and 2. Can be considered as part of ongoing process.</p> <p>3. No. Sufficiently covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			space) comprises the remains of Roman burial mound. The northern Scheduled Monuments is the moated site at The Old Parsonage. This is located outside the boundary of the development area, however, must be considered as the development has the potential of changing its rural setting Policies 10 and 10a must be amended to refer to a Conservation Management Plan to facilitate the long-term management of the respective heritage asset.	within the ECC response in appendix 5 accompanying ECC response. 2. Amend Core Policies 10 and 10a to include the following wording – <ul style="list-style-type: none"> <i><u>"A Conservation Management Plan must be prepared setting out the long-term management of the heritage asset(s)".</u></i> 		
32	Para 6.20, page 87	3. N	4 - Consistent with National Policy ECC also draws attention to the Childcare Act 2006, which gives ECC the statutory authority to ensure there is sufficient high quality and accessible early years and childcare places within the local area. This policy must be amended to ensure reference to Early Years and Childcare facilities.	Amend paragraph 6.20, third bullet to read – <i>"a safeguarded area for the potential future provision of a new primary school with collocate early years and childcare facilities close to the local centre and along a bus route, along with provision of a new health care facility provided by the developer working with the NHS"</i>	Y	YES UDC 39 (6.20/87)
33	Para 6.20 - Para 6.22	3. N	4 - Consistent with National Policy ECC recommends that to ensure consistency with national policy that the text be amended to ensure the mitigation of any harmful impact to the Grade II listed status of the Crouches Farmhouse, which overlooks the proposed Local Centre. The agrarian landscape, that the farmhouse overlooks contributes positively to its setting, careful consideration is needed of the design, massing and landscaping of any emerging scheme.	Amend bullet 1 to read – <ul style="list-style-type: none"> <i>"A new local centre organised around a new riverside public park should be located on the northern parcel to serve new and existing residents. Consideration must be given to Grade II listed status of the Crouches Farmhouse, which will overlook the proposed local centre".</i> 	Y	NO Unnecessary. Sufficiently covered by existing wording.
34	Para 6.22, pages 87 & 88	OBJECT 1. Y 2. XXX 3. N	3 - Effective 4 - Consistent with National Policy ECC recommends that the Submission Local Plan be amended to ensure consistency with the ECC Developers Guide for Infrastructure Contributions (2024), by referring to school area (in hectares) rather than forms of entry. The precise forms of	Amend paragraph 6.22, bullet 1 of to read – <ul style="list-style-type: none"> <i>"a new all through school (Use Class F1 (a)) for primary and secondary with co-located early years and childcare nursery (Use Class E(f)) on 14.5 hectares of suitable land at East of Takeley. The location will accord with the</i> 	Y	NO Unnecessary duplication. Adequately covered by existing wording.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>entry are determined by ECC as Education Authority in statutory process, not within Local Plan making.</p> <p>Reference to site area ensures land values are appropriate for education use, assisting the delivery and viability of future education infrastructure delivery.</p> <p>The size of schools built will be the subject of separate consultation and determined through statutory process – see ECC comments in relation to Core Policy 10.</p> <p>The precise citing of the school must accord with the Site Suitability criteria set out within the Essex Developers Guide for Infrastructure Contributions.</p>	<p><u>Site Suitability criteria set out within the Essex Developers Guide for Infrastructure Contributions</u></p>		
35	Fig 6.2, page 89 and Core Policy 10	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Figure 6.2: Proposed Strategic Allocations: Great Dunmow (related to Core Policy 10) fails to include a land allocation for the education facility.</p> <p>'Education Facility' is included in the key but there is no corresponding allocation on the diagram/map. The ECC Developers' Guide to Infrastructure Contributions states that reference to site area ensures land values are appropriate for education use, assisting the delivery and viability of future education infrastructure delivery.</p> <p>The indicative map should show the education facility and be consistent with the current key.</p>	Amend Figure 6.2 to show the 'Education Facility' and be consistent with the current key. It must allocate the indicative land for the education facility within Great Dunmow.	Y	YES UDC 41 (Figure 6.2/89)
36	Core Policy 10 (Table 6.1) and Figure 6.2, page 89 Paragraph 6.20, page 87	OBJECT 1. Y 2. XXX 3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>At the Regulation 18 Local Plan consultation ECC highlighted concerns with the allocation at Church End (East of Great Dunmow) – referred to as 'Land between the River Chelmer and B1008' in Core Policy 10, Table 6.1 and shown as 'A' on Figure 6.2. The concerns related to the need for evidence to</p>	<p>For this allocation to be sound, further transport modelling and evidence is required to ensure deliverability and to appreciate how adequate active and sustainable modes can be achieved</p> <p>Of particular note is the evidence related to the bridge weight limit for the Church End Bridge. In preparing evidence, the technical approval</p>	Y	See separate comments

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>support the allocation as road access is limited and there are known challenges to facilitate sustainable travel. ECC also highlighted that the development proposed was located to the east of a weak bridge (Church End Bridge), with a narrow carriageway on which buses are not permitted. The provision of suitable walking and cycling interventions are therefore currently limited.</p> <p>For the Reg 19 Local Plan the transport evidence fails to justify how this allocation will facilitate the delivery of sustainable modes noting the weak bridge. Given the site's location in Great Dunmow, ECC would anticipate "higher than business as usual" sustainable trips.</p> <p>ECC are mindful that accessibility to the site is constrained by a bridge weight limit at Church End, meaning a circuitous route to the town centre and beyond for buses, and walking and cycling being challenging to deliver any real measures due to the nature of Church End/Church Street. This point is not addressed in any of the Reg 19 Local Plan transport evidence.</p> <p>The allocation is on the opposite side of town to the proposed relocated secondary school, making the need for deliverable sustainable and active modes of travel, setting aside the immediate site challenges.</p> <p>Further transport modelling and evidence is required to appreciate how active and sustainable travel will be facilitated and delivered for this allocation to be viable and effective.</p>	<p>process in accordance with CG300 must be followed by the applicant/site promoter to ensure any conclusions are valid. Engagement with ECC as the Highway Authority must take place. The following are key items to address.</p> <ul style="list-style-type: none"> Approval in Principle (AIP) for Assessment must be undertaken / agreed with the Technical Approval Authority (TAA). This will confirm material properties and analysis methods to be used in the assessment. There may need to be additional testing to confirm the classification of the primary elements as early steel, not cast iron. Again, this would be discussed and agreed with the TAA at AIP stage. The Assessment report will need to be accompanied by Assessment & Check certification. 		
37	Core Policy 10a and para 6.22 to 6.25	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>As previously articulated at the Regulation 18 stage of the Local Plan consultation, the emerging Local</p>	Amend Core Policy 10a and relevant supporting paragraphs to ensure the preservation of the landscape surrounding the Scheduled Monument of Warish Hall.	Y	<p>NO</p> <p>Unnecessary duplication.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			Plan must preserve the agrarian landscape around the Scheduled Monument of Warish Hall.			Adequately covered by existing wording.
38	Core Policy 11 – London Stansted Airport and paragraphs 6.29 to – 6.46	3. N	<p>4 - Consistent with National Policy</p> <p>Comments below reflect policy headings.</p> <p>Operation and Development ECC considers that Core Policy 11 must be strengthened to ensure clarity and clearly articulate the planning context for London Stansted Airport envisaged for the Local Plan period. Consistency with national policy is imperative.</p> <p>Core Policy 11 references the passenger cap of 43 million passenger per annum, consistent with the recent planning application UTT/18/0460/FUL. However, it fails to reference the passenger and freight movement limits. Movement limits provide an understanding for the scope for existing growth at the airport, as well as the cargo use provide a full understanding of the role the airport plays for the local and national economy.</p> <p>Development at London Stansted must be consistent with current planning applications namely UTT/18/0460/FUL and the terminal extension (s62A/2023/0022). UDC can use these applications as a basis for the policy context.</p> <p>The policy must outline the mitigations and expectations to be considered in assessing future proposals at the airport. In setting this out, the policy must also have due regard to relevant national DfT policies -</p> <ul style="list-style-type: none"> • Airport National Policy Statement (Airport NPS) New Runway Capacity and Infrastructure at Airports in the South East of England (2018). (Airport NPS); and • Beyond the Horizon - the Future of UK Aviation – Making Best Use of Existing Runways (2018) (MBU). <p>Harlow Stansted Airport College</p>	<p>The comments below reflect policy headings.</p> <p>Operation and Development Amend Core Policy 11 to be consistent with the most recent planning permissions, UTT/18/0460/FUL and s62A/2023/0022.</p> <p>Consideration must be given to the Airport NPS as this provides the primary basis for decision making on development consent applications for a <u>Northwest Runway at Heathrow Airport and other airport infrastructure in London and the South East of England</u>. It is therefore important when reviewing the UDC Local Plan.</p> <p>The policy must ensure consistency and reference the Making Best Use of Existing Runways (MBU) DfT policy. 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 the first UK airport to be granted permission on appeal following the publication of this policy.</p> <p>It should be noted that there are key provisions within the UTT/18/0460/FUL</p>	Y	Unclear what is being proposed. There are some proposed modifications relating to the airport informed by discussions with MAG and further modifications can be anticipated as part of the ongoing process.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>The Harlow Stansted College plays a significant role in the training and development of staff to facilitate the existing and future growth at London Stansted Airport. It was the first purpose-built college at a UK airport and therefore a pioneer institution within its field.</p> <p>The policy must provide the policy tools to facilitate any possible future growth and development at the Harlow Stansted College. As there may be potential for the college and key partners to enlarge and diversify the training offered within the existing 500-student capacity building to meet demand as well as creating the UK's first aviation education and skills campus at the site. It is therefore important given the expected employment growth at Stansted that the Local Plan can facilitate and support such growth. It is recommended that reference to the Harlow Stansted College be included within the supporting text and the policy strengthened to facilitate potential expansion to support aviation skill and training for the future aviation community.</p> <p>Aerodrome Safeguarding Core Policy 11 now references Aerodrome Safeguarding, which was an issue raised within the ECC's consultation response at the Regulation 18 stage. However, it is considered that the Local Plan can be further strengthened in relation to aerodrome safeguarding. It must be noted that to be consistent with the Aviation Policy Framework it states that <i>"local planning authorities should 'identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen choice'. This could apply to airport infrastructure"</i> (Aviation Policy Framework, para 5.8).</p>	<p>planning permission that may assist in amending Core Policy 11 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. 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. 		

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				<ul style="list-style-type: none"> • 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> <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 		

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				<p>adverse effects on vegetation within Hatfield Forest and/or Eastend Wood.</p> <p><u>Surface Water Discharge</u></p> <ul style="list-style-type: none"> Implement watercourse monitoring scheme. <p>Similarly consideration must be given to the most recent terminal transformation planning permission as that contains key provisions that will assist in shaping this policy.</p> <p><u>Harlow Stansted College</u> Amend the supporting text and policy to include reference to the Harlow Stansted College and the continued support for future expansion to ensure assist in the delivery of trained and skilled staff to support planned growth at Stansted airport.</p> <p><u>Safeguarding</u> Amend Core Policy 11 to ensure that consideration is given to address bird strike. ECC is mindful that there are other policies within the plan advocating biodiversity creation/and BNG. Bird strike is an issue that must be considered near airfields, and therefore in developing future BNG/habitat creation policies, consideration should be given to BNG locations, particularly where larger off-site solutions are proposed, as their proximity to airfields will likely attract birds, which can be a hazard. Furthermore consideration should be given to how the Local Plan is seeking to address glint and glare safeguarding in and around aerodromes.</p>		

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				Furthermore ECC recommends that UDC must ensure that the Local Plan has where appropriate identified and/or protected relevant sites to facilitate a choice in future airspace change proposals that may benefit the existing and future local community within Uttlesford.		
39	Core Policy 13	3. N	<p>3. Effective 4. Consistent with National Policy.</p> <p>Core Policy 13 point ii mentions the connection along the B1256 but should also include the following which are seen as critical for the delivery of the South Uttlesford Area strategy.</p> <ul style="list-style-type: none"> safeguarding land between Takeley 4 Ashes and Taylors farm employment area for a shared use cycle/walking facility. UDC LCWIP routes - Takeley to Stansted Airport <p>These should be included to widen choice for sustainable modes, that link to largescale future development within South Uttlesford.</p> <p>The last paragraph needs amendment to ensure the correct reference to the Local Transport Plan.</p>	<p>1. Amend Core Policy 13, point ii as follows. "ii. contribute towards delivering strategic cycling and walking infrastructure improvements as identified in the Uttlesford and Essex Local Cycling and Walking Infrastructure Plan (LCWIP) including connections along the B1256 between Great Dunmow, Takeley, Stansted Mountfitchet and Bishop's Stortford, <u>safeguarding land between Takeley 4 Ashes and Taylors farm employment area for a shared use cycle/walking facility, and routes between Takeley to London Stansted Airport.</u>"</p> <p>2. Amend Core Policy 13, last paragraph to read as follows. "The package may be further refined through development of the <u>new</u> Local Transport and Connectivity Plan being developed by Essex County Council."</p>	Y	<p>YES UDC 43 (CP13/100)</p> <p>MAIN</p>
40	Core Policy 14, page 101	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>UDC are seeking to safeguard land for future education use, as articulated within Core Policy 14 which states under point iv - '<i>land to enable longer-term expansion of the secondary school at Takeley,</i></p>	<p>Amend Core Policy 14 bullet (iv) to state -</p> <p><u>Land will be allocated for education and childcare use for:</u></p> <ul style="list-style-type: none"> <u>a new primary school (Use Class F1 (a)) with co-located early years</u> 	Y	<p>1. NO</p> <p>Unnecessary duplication. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>adjoining the allocation made by this plan, should this be found to be needed following more detailed feasibility work'.</i></p> <p>ECC appreciates that safeguarding is a planning mechanism employed to ensure land allocated for development in the future is protected from conflicting development. Safeguarding is used in local plans, as well as the protection of the Green Belt, and/or safeguarding directions may be made in relation to significant infrastructure projects.</p> <p>ECC as Education Authority must understand the deliverability matters associated with safeguarding land for education use to ensure the land is deliverable when the demand for education services is required.</p> <p>A review of the NPPF has been undertaken to appreciate the application of safeguarding education land as proposed by UDC within the Local Plan.</p> <p>ECC acknowledge that emerging Local Plans must set out a strategy for the pattern, scale and design quality, making provision for community use that includes education. This is articulated in paragraph 20 of the NPPF –</p> <p><i>“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:</i></p> <ul style="list-style-type: none"> <i>a. housing (including affordable housing), employment, retail, leisure and other commercial development;</i> <i>b. infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</i> 	<p><u>and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land at North East Great Dunmow</u></p> <ul style="list-style-type: none"> • <u>a new all through school (Use Class F1 (a)) for primary and secondary with co-located early years and childcare nursery (Use Class E(f)) on 14.5 hectares of suitable land at East of Takeley</u> <p>To support this policy and others referencing “safeguarded education land” further evidence is required to demonstrate that educational infrastructure needs can be delivered to meet growth needs.</p> <p>Evidence is required to ensure that the site is deliverable within the Plan period and viable. Examples of factors to be considered to support the safeguarding education land include (but not limited to) -</p> <ul style="list-style-type: none"> • Land ownership <ul style="list-style-type: none"> ○ Who owns the land? ○ Are land owners agreed that the land will be utilised for future education use? • Land suitability <ul style="list-style-type: none"> ○ How has the land been identified as suitable for this use? ○ Does the land conform to ECC site suitability criteria outlined in the ECC Developers’ Guide to Infrastructure Contributions? ○ What alternative land parcels adjacent to any of the school sites have been considered? ○ Is there any contamination on the land given previous uses? ○ Note that the parcel of land includes land that has 		<p>2. NO See separate comments.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>c. <i>community facilities (such as health, education and cultural infrastructure); and</i> d. <i>conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."</i></p> <p>It is noted that broad locations for development may be outlined within the key diagram/policies map (para 23 NPPF).</p> <p>ECC must be satisfied that land safeguarded for education use can be delivered when required, therefore further evidence must support this policy. Also the wording of the policy must be amended.</p>	<p>forest/plantations - can this be cleared and effectively utilised for a school site?</p> <ul style="list-style-type: none"> • Deliverability <ul style="list-style-type: none"> ○ How is it envisaged the land will be transferred to ECC to enable its use for education and at what cost? ○ Would ECC need to use CPO powers to acquire the land for education? ○ Can the site be delivered from existing Section 106 monies collected? ○ Can the site(s) be attributed to future allocated residential development, and section 106 monies in the emerging Local Plan to facilitate financial viability and delivery. ○ What is the evidence to support this policy and demonstrate that school places can be delivered within the timescales required to meeting educational infrastructure service requirements. <p>ECC must be engaged in developing this evidence given our role as Education Authority and the Duty to Cooperate.</p>		
41	Para 6.59	CORRECTION	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Reference to '<i>Local Nature Recovery Sites</i>' is incorrect and must be amended to '<i>Local Nature Recovery Strategy</i>'.</p>	<p>Amend paragraph 6.59 to read as follows –</p> <ul style="list-style-type: none"> • Deleting reference to '<i>Local Nature Recovery Sites</i>'; and replace with '<i>Local Nature Recovery Strategy</i>'. 	N	YES UDC 45 (6.59/102)
42	Para 6.59	3. N	<p>4 - Consistent with National Policy</p> <p>To provide clarity it is recommended that reference to the '15 metre buffer zones' includes reference to <u>Government Guidance</u> and an explanation of the purpose of the buffer zone. The buffer zone</p>	<p>Amend paragraph 6.59 to read as follows:</p> <ul style="list-style-type: none"> • "<i>...by 15m buffer zones providing protection from</i> 	N	YES UDC 46 (6.59/102)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan	Reason	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
		1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy			
			provides areas with protection from development by 15m buffer zones. See weblink below. <u>Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)</u>	<i>development and consistent with government standing</i> . <ul style="list-style-type: none"> Insert a Footnote to the Government Guidance entitled - <u>Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (2022)</u> 		
43	Para 6.60	CORRECTION	3 - Effective 4 - Consistent with National Policy The current wording - 'Habitat Sites' is incorrect. It must be amended to refer to " <u>ecological sites</u> ". 'Habitat Sites' reflects NPPF terminology for internationally designated sites, which is not required within UDC as there are no internationally designated sites (an exception is Essex Coast RAMS).	Amend paragraph 6.60 to read - <i>"All of these Habitat Sites ecological sites are designated for their Ancient..."</i> .	N	YES UDC 49 (6.60/102)
44	Para 6.61	CORRECTION	3 - Effective 4 - Consistent with National Policy The current wording 'Habitat Sites' is incorrect. It must be amended to refer to " <u>ecological sites</u> ". 'Habitat Sites' reflects NPPF terminology for internationally designated sites, which is not required within UDC as there are no internationally designated sites (an exception is Essex Coast RAMS).	Amend paragraph 6.61 to read – <i>"Other Habitat Sites ecological sites include..."</i> .	N	YES UDC 50 (6.61/102)
45	Core Policy 16 and Table 7.1	3. N	3 - Effective 4 - Consistent with National Policy ECC maintains its 'holding objection' raised at the Regulation 18 stage/consultation to the site allocations at the north of Stansted Mountfitchet as there continues to be a lack of clarity and evidence relating to deliverable and viable sustainable and active travel modes required to support the development and in compliance with local plan policies. The NPPF states –	Further evidence needs to be undertaken and provided that clearly demonstrates sustainable and active travel routes are deliverable for Stansted Mountfitchet.	Y	See separate comments

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>"Planning policies and decisions should support development that makes efficient use of land, taking into account... the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use"</i> (paragraph 128).</p> <p>ECC stated in its representation at the Regulation 18 Local Plan consultation we reserved judgement pending the publication of the Uttlesford LCWIP.</p> <p>The LCWIP has now been published and forms part of the local plan evidence base. Whilst the LCWIP shows a route connecting the proposed allocation and Stansted Mountfitchet via B1256 or High Lane evidence is lacking to indicate that this route is deliverable within the highway or land in the control of the promoters. Furthermore, if High Lane becomes an active travel corridor what wider impact does this have on traffic moving around Stansted Mountfitchet? The transport modelling work does not appear to consider this. The existing development at Walpole Farm struggled to provide adequate connections from Hornbeam Way into the existing residential development west of the B1256 and therefore access along the B1256 corridor/High Lane are the only realistic options for active travel to local facilities and services.</p> <p>Stansted Mountfitchet is a location where "better than Business as Usual" level of sustainable travel is expected and therefore the delivery of sustainable and active modes is essential.</p>			

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
46	Para 7.10, page 108 Para 7.21, page 112 Para 7.21, 6 th bullet, p112	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC draws attention to the <u>Childcare Act 2006</u>, which gives ECC the statutory authority to ensure there is sufficient high quality and accessible early years and childcare places within the local area. Section 6 of the Act defines 'sufficient childcare' as sufficient to meet the requirements of parents in the area who require childcare in order to enable them to take up, or remain in, work or undertake education or training which could reasonably be expected to assist them to obtain work. Unlike education, parents can choose to access childcare away from their home area, for example near to a place of work or training.</p> <p>Within the Developers Guide, makes it clear that ECC "publishes Childcare Sufficiency Assessments, Area Action Plans and the Early Years and Childcare 5-year plan, which details where places are required across the county" (page 29). It also highlights that consideration should be given to the delivery of Early Years and Childcare facilities within Local Plans. It is important that reference is given to the role of 'childcare' and that is referenced in emerging policies, as there is a difference in terminology to 'early years'.</p>	<p>1. Amend paragraph 7.10 bullet 2 to state – "provision of land to enable the delivery of a new primary school, and early years and childcare..."</p> <p>2. Amend paragraph 7.21 to read – "...land to enable the delivery of a new primary school and early years and childcare provision".</p> <p>3. Amend paragraph 7.21, 6th bullet to read</p> <ul style="list-style-type: none"> • "contribute land to ensure 2.1ha is available overall, to enable the delivery of a new primary school and early years and childcare provision (approximately 1ha needed from the new allocation)." 	Y	<p>1. YES UDC 51 (7.10/108)</p> <p>2. YES UDC 54 (7.21/121)</p> <p>3. CHECK</p>
47	Para 7.14 – Housing	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC, with its responsibilities under the <u>Care Act 2014</u>, is concerned that this section is not compliant with NPPF para 63 (page 17) and national planning practice guidance.</p> <p>Para 7.14 states "A high proportion of local housing will be affordable and available in different tenures with additional specialist housing, including those</p>	<p>Amend para 7.14 to ensure that "specialist and supported housing" within Uttlesford addresses the needs of the following "including, but not limited to, the following people living with/who are –</p> <ul style="list-style-type: none"> • disabled (physical and/or, sensory impairments), • learning disability and autism, • mental health, • older people, residents leaving institutions such as the care sector, prison, or hospital, 	Y	<p>YES UDC 52 (7.14/109)</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>that are suited to our ageing population and those that wish to rent."</i></p> <p>The wording here is slightly different from that in paragraph 6.14 which is saying something similar. The two paragraphs should be the same.</p> <p>The wording seeks to address housing provision and the need for an ageing population only. National policy highlights that needs and provision of housing must address the needs of other cohorts. Specialist and supported housing (SSH) is needed to meet the housing needs of a wide variety of residents with different housing needs across all ages, including looked after children. The need for SSH housing should include, but not limited to, the following people living with/who are -</p> <ul style="list-style-type: none"> • disabled (physical and/or, sensory impairments), • learning disability and autism, • mental health, • older people, • residents leaving institutions such as the care sector, prison, or hospital, • survivors of domestic abuse, • people who require supported housing due to their homelessness, and • children's homes for looked after children. <p>Paragraph 6.14 needs to be revised to be consistent with the following – National Guidance and Policy</p> <ul style="list-style-type: none"> • Care Act 2014 • NPPF (para 63) (both 2023 and draft 2024 version) • May 2023 Minister of Housing Statement - making it clear that <i>"the planning system should not be a barrier to providing homes for the most vulnerable children in society."</i> The statement noted that <i>"Local planning</i> 	<ul style="list-style-type: none"> • <i>survivors of domestic abuse,</i> • <i>people who require supported housing due to their homelessness, and</i> • <i>children's homes for looked after children".</i> <p>To support this amendment the definition of "supported housing" in the glossary should be updated and consideration given to the policy references within the justification and reflected within the evidence base to support the Local Plan.</p>		

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area".</i></p> <p>County Policy/Guidance</p> <ul style="list-style-type: none"> • ECC Developers' Guide to Infrastructure Contributions (Appendix J) • <u>EPOA's Essex Design Guide / Ageing Population</u> • <u>ECC Extra Care Design Guide 2023</u> • <u>ECC Supported Living Accommodation Standards</u> • <u>ECC Design Guide for LD Complex Needs Accommodation for Adults with Disability</u> 			
48	Core Policy 16 and Table 7.1	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>The Reg 19 Local Plan allocates land for 110 dwellings in Elsenham as outlined in Core Policy 16/Table 7.1. Over recent years and with an up to date local plan, significant growth has taken place in an unplanned way across Elsenham.</p> <p>This allocation has the potential to contribute to known transport problems. In particular ECC are concerned about the impacts on Grove Hill, which were highlighted through Duty to Cooperate reviews of the possible spatial options in February 2022.</p> <p>The overarching position in relation to transport in Elsenham is set out in the Transport Evidence Topic Paper and ECC as Highways Authority notes the conclusions in Section 6.33. The Elsenham site was included in the A120 VISUM modelling and therefore the local impacts and 'downstream' impacts appear to be assessed. However, these are not explicitly covered in the Tetra Tech report output report for the A120 corridor, which is a deficiency in the output reporting. ECC notes that the transport evidence base does not appear to</p>	<p>Further detail and clarification on the transport evidence base is required. The Elsenham site was included in the A120 VISUM modelling and therefore the local impacts and 'downstream' impacts appear to be assessed. However, these are not explicitly covered in the Tetra Tech report output report for the A120 corridor, which is a deficiency in the output reporting. ECC also notes that the transport evidence does not appear to consider the impact of additional development on Grove Hill. This is a matter requiring further detail and clarification from UDC.</p> <p>Further transport evidence may need to be undertaken to demonstrate adequate transport mitigation measures are in place/planned without a significant impact on Grove Hill.</p>	Y	See separate comments

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>consider the impact of additional development on Grove Hill, including Henham where 121 dwellings will need to be allocated through the neighbourhood plan (Core Policy 19). This is a matter requiring further detail and clarification from UDC.</p> <p>ECC have raised objections to two recent Section 62a planning application for impact on Grove Hill, these were subsequently approved by the Planning Inspectorate. A S278 scheme in about to be implemented at Grove Hill but this is mitigation from consented development and there is no evidence this could satisfactorily accommodate the proposed Elsenham allocation.</p>			
49	Core Policy 16, page 113	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>The NPPF states <i>"It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</i></p> <ol style="list-style-type: none"> <i>a. give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and</i> <i>b. work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted"</i> (para 99). <p>To ensure there is sufficient choice for school places in the future, ECC recommends that the policy must be amended to be consistent with the ECC Developers' Guide for Infrastructure Contributions which states <i>"In line with DfE guidance, additional land for expansion of new school sites should be safeguarded and alternative uses should be precluded thus enabling ECC to purchase such sites</i></p>	<p>Amend Core Policy 16 to include the following.</p> <p><u>"Land will be allocated for education and early years and childcare use for:</u></p> <ul style="list-style-type: none"> • <u>1ha of suitable land adjacent to the education land secured at Station Road Elsenham, consistent with planning application UTT/17/3573. Ensuring 0.13ha of suitable land reserved for early years and childcare EYCC on the purposed school sites.</u> • <u>4ha of suitable land adjacent to Forest Hall School (Use Class F1 (a))."</u> 	Y	<p>NO</p> <p>Unnecessary duplication. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>at the intended education use value"</i> (Section 4.4 (para 2)).</p> <p>Core Policy 16 is a strategic policy for the Stansted Mountfitchet and Elsenham Area. It is appreciated that this policy aims to deliver a balance of 'housing and a range of infrastructure'. With this in mind it must be amended to include the allocation of land for education use, thereby setting land values and providing certainty over the areas needed, assisting the delivery and viability of the spatial strategy for this area, making the plan sound. The policy is also to be amended to include reference to the early years and childcare site area requirements.</p>			
50	Core Policy 17 (i) and (ii)	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>This representation is read alongside that made to Core Policy 16.</p> <p>A key policy objective and outcome of the Reg 19 Local Plan is to deliver sustainable and active modes. Core Policy 17 outlines the requirements in Stansted and Elsenham, however there is a lack of evidence to demonstrate that the stated schemes are deliverable and viable.</p> <p>ECC is mindful that the Lower Street route due to its nature would need to be closed to through-traffic to make it attractive for cycling. It is currently used as a short cut to the railway station from the north and the town centre. ECC acknowledges that the supporting policy texts alludes to this, but a solution is not provided. The routes between developments/settlements are generally on narrow or constrained routes and would require significant funding to deliver. Due to the dispersed nature of populations, they are unlikely to attract sufficient users to leverage central government funding unless there is a major change to support such networks.</p>	ECC recommends that evidence is provided to demonstrate the identified routes in Core Policy 17 are deliverable – physically and can be funded.	Y	See separate comments
51	Core Policy 18, page 118	3. N	<p>3 - Effective 4 - Consistent with National Policy</p>	Amend Core Policy 18 to state – <i>"Allocate 4ha of suitable land (Use Class F1 (a)) for the expansion of Forest</i>	Y	See separate comments

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>This policy refers to the safeguarding 4ha of land for education use at the existing Forest Hall Secondary School at Stansted Mountfitchet.</p> <p>The proposed safeguarded land is within the Green Belt and 'exceptional circumstances' for the release of land must be demonstrated to be consistent with the NPPF para 154.</p> <p>ECC appreciates that safeguarding is a planning mechanism employed to ensure land allocated for development in the future is protected from conflicting development. Safeguarding is used in local plans, as well as the protection of the Green Belt, and/or safeguarding directions may be made in relation to significant infrastructure projects.</p> <p>ECC as Education Authority must understand the deliverability matters associated with safeguarding land for education use to ensure the land is deliverable when the demand for education services is required.</p> <p>A review of the NPPF has been undertaken to appreciate the application of safeguarding education land as proposed by UDC within the Local Plan.</p> <p>ECC acknowledge that emerging Local Plans must set out a strategy for the pattern, scale and design quality, making provision for community use that includes education. This is articulated in paragraph 20 of the NPPF –</p> <p><i>“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:</i></p> <p><i>a. housing (including affordable housing), employment, retail, leisure and other commercial development;</i></p>	<p><i>Hall Secondary School at Stansted Mountfitchet”.</i></p> <p>To support this policy and others referencing “safeguarded education land” further evidence is required to demonstrate that educational infrastructure needs can be delivered to meet growth needs.</p> <p>Evidence is required to ensure that the site is deliverable within the Plan period and viable. Examples of factors to be considered to support the safeguarding education land include (but not limited to) -</p> <ul style="list-style-type: none"> • Land ownership <ul style="list-style-type: none"> ○ Who owns the land? ○ Are land owners agreed that the land will be utilised for future education use? • Land suitability <ul style="list-style-type: none"> ○ How has the land been identified as suitable for this use? ○ Does the land conform to ECC site suitability criteria outlined in the ECC Developers’ Guide to Infrastructure Contributions? ○ What alternative land parcels adjacent to any of the school sites have been considered? ○ Is there any contamination on the land given previous uses? ○ Note that the parcel of land includes land that has forest/plantations - can this be cleared and effectively utilised for a school site? • Deliverability <ul style="list-style-type: none"> ○ How is it envisaged the land will be transferred to ECC to enable 		

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>b. <i>infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</i></p> <p>c. <i>community facilities (such as health, education and cultural infrastructure); and</i></p> <p>d. <i>conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."</i></p> <p>It is noted that broad locations for development may be outlined within the key diagram/policies map (para 23 NPPF).</p> <p>ECC must be satisfied that land safeguarded for education use can be delivered when required, therefore further evidence must support this policy. Also the wording of the policy must be amended.</p>	<p>its use for education and at what cost?</p> <ul style="list-style-type: none"> ○ Would ECC need to use CPO powers to acquire the land for education? ○ Can the site be delivered from existing Section 106 monies collected? ○ Can the site(s) be attributed to future allocated residential development, and section 106 monies in the emerging Local Plan to facilitate financial viability and delivery. ○ What is the evidence to support this policy and demonstrate that school places can be delivered within the timescales required to meeting educational infrastructure service requirements. <p>UDC must also ensure that consideration has been given to Green Belt release.</p> <p>ECC must be engaged in developing this evidence given our role as Education Authority and the Duty to Cooperate.</p>		
Chapter 8 – Thaxted and the Rural Area Strategy						
52	Core Policy 19	OBJECT 1. Y 2. XXX 3. N	3 - Effective 4 - Consistent with National Policy The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out in Policy S8 of the <u>Minerals Local Plan (MLP)</u> and Policy 2 of the <u>Waste Local Plan (WLP)</u> or their future equivalents.	Amend Core Policy 19 after table 8.2 to ensure minerals and waste matters are stated as considerations that must be addressed as part of the Neighbourhood Plan. Include an additional paragraph, as follows. <u>"Any site development proposals are subject to minerals (Essex Minerals Local Plan Policy S8) and waste (Essex and Southend-on-Sea Waste Local Plan Policy 2) safeguarding policy"</u>	N	YES UDC 55 (CP19/128) MAIN

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			This table sets out a proposed housing requirements for the larger villages, and it is envisaged that these will be brought forward through Neighbourhood Plans. UDC has not engaged ECC as MWPA on these locations set out within Core Policy 19 – Table 8.2, and therefore has not determined the impacts (if any) of mineral and waste policy requirements to these locations. According	This will ensure compliance with the MLP and WLP which are part of the statutory Development Plan for Uttlesford but are often overlooked by those preparing Neighbourhood Plans.		
53	Core Policy 19	Object	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Core Policy 19 sets out a 600 dwelling residential non-strategic (sites under 100 dwellings) housing requirement for the Rural Area and across the Larger Villages/other settlements. These sites will be allocated and delivered through Neighbourhood Plan allocations.</p> <p>A key issue for these allocations will be the impact of development on the highway network, required mitigation measures and the need to deliver sustainable and active modes.</p> <p>ECC as Highways and Transportation Authority seeks an amendment Core Policy 19 to ensure transportation and highway issues are addressed as part of the Neighbourhood Plan, master planning process and/or planning applications for these locations outlined in table 8.2 of the policy. At this stage it is unclear what interventions may be required and additional modelling is likely to be needed.</p> <p>Including this requirement in Core Policy 19 will support Local Plan Core Policy 1 (bullet i) which seeks to ensure the location and layout of development will assist in the delivery of sustainable travel infrastructure, and the policy provisions set out in Core Policy 26 the overarching</p>	<p>Amend Core Policy 19 to ensure transportation and highway matters are stated as considerations that must be addressed as part of the Neighbourhood Plan, any master planning process and planning applications for these non-strategic site allocations. Include an additional paragraph, as follows -</p> <p><u>"A key consideration is transportation, reducing impacts on the highway network and delivering sustainable and active modes. The Neighbourhood Plan, any master planning process and planning applications are to liaise with Essex County Council as the Highway Authority to determine modelling requirements and ensure appropriate mitigation measures including the need to deliver sustainable and active modes"</u>.</p>	Y	<p>NO</p> <p>Unnecessary duplication of national policy.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			sustainable travel policy. Furthermore the NPPF states – “Planning policies and decisions should support development that makes efficient use of land, taking into account.... the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use” (paragraph 128).			
Chapter 9 – Climate Change, Transport and the Environment						
54	Para 9.8	CORRECTION	Correction required UDC should ensure that there is consistent terminology referencing throughout the Local Plan, that also reflects the <u>technical evidence</u> base that has been prepared to support the development of the planning policy approach for reducing carbon emissions from new development within Greater Essex. Paragraph 9.8 within the Local Plan refers to a 'carbon offset' scheme, but the scheme relates to 'energy offsets' – see para 9.15 and Policy 22 where reference is made to Essex energy offset scheme.	Amend paragraph 9.8, last sentence to replace 'carbon offset' with ' energy offset '.	N	NO
55	Para 9.11 & Footnote 76	Correction	Correction required The Local Plan must be amended to reference the correct policy position and net zero evidence base link.	1. Amend the last sentence of para 9.11 to read - <i>'...and aligns with the Essex-wide recommended planning policy for Net Zero Carbon Development (in operation) published on in the Essex Net Zero Policy- Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex – November 2023 set out on the Essex Design Guide.....'</i> 2. Amend footnote 76 using the following links. <ul style="list-style-type: none"> Net Zero Evidence base - https://www.essexdesignguide 	N	YES UDC 56 (9.11/ Footnote 76/ 143)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				.co.uk/climate-change/essex-net-zero-evidence/ <ul style="list-style-type: none"> Direct link to policy document is - https://www.essexdesignguide.co.uk/media/2954/net-zero-carbon-planning-policy-for-greater-essex-november-2023.pdf 		
56	Para 9.12	Correction	For clarity an amendment is required.	Correct typo in para 9.12 c – 'onside' to ' onsite '.	N	YES UDC 57 (9.12/144)
57	Para 9.15	Correction	For clarity an amendment is required.	Replace " <i>including Climate Action Commission</i> " to " funded by the Essex Climate Action Commission ".	N	YES UDC 58 (9.15/145)
58	Para 9.15 Footnote 82 and 83	Correction	For clarity an amendment is required.	1. Replace hyperlink for footnote 82 to – <ul style="list-style-type: none"> Introba technical evidence 'Essex net zero policy study' - https://www.essexdesignguide.co.uk/climate-change/essex-net-zero-policy-study/ 2. Replace weblink for footnote 83 to – <ul style="list-style-type: none"> Three Dragons study - https://www.essexdesignguide.co.uk/climate-change/essex-net-zero-evidence/net-zero-carbon-viability-and-toolkit-study/ 	N	YES UDC 59 (9.15/ Footnotes 82 and 83/ 146)
59	Para 9.21 – footnote 85	Correction	For clarity an amendment is required.	Replace footnote link for the Net Zero Evidence to - <ul style="list-style-type: none"> https://www.essexdesignguide.co.uk/climate-change/essex-net-zero-evidence/ 	N	YES UDC 60 (9.21/ Footnote 85/ 147)
60	Para 9.27 and 9.30	CORRECTION	For clarity an amendment is required.	Reference to " <i>Appendix 8</i> " should be reference to " Appendix 10 ".	N	YES UDC 62 (9.27 and 9.30/ 151)
61	Core Policy 22 – Net Zero Operational Carbon Development	CORRECTION	For clarity an amendment is required.	Amend Core Policy 22, Part A, Requirement 1, point ii - delete the	N	YES UDC61 (CP22/ 148)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				words 'less than' as it doesn't make sense. Wording as follows. "ii. all new bungalows must achieve a space heating demand of less than 20 kWh/m2 GIA/yr or less"		MAIN
62	Core Policy 22 – Net Zero Operational Carbon Development	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>The UDC Policy 22 includes an additional point set out below:</p> <p><i>"Requirement 3, point ii) on larger sites in exceptional circumstances this may be met as a site-wide residential average (weighted by floor area), provided that no single dwelling has an EUI of >60kWh/m2 /yr"</i></p> <p>The inclusion of the clause 'in exceptional circumstances' for larger residential sites to not meet the EUI target of 35 kWh/m2/year on every home but meet it as a 'site wide' average, unjustifiably weakens the policy approach.</p> <p>It is unclear what these exceptional circumstances might be, how a site wide average would be evidenced and demonstrated, what the implications are including for future residents, and why a larger residential site would not be able to meet the policy whereas a smaller site can? The Essex <u>technical evidence</u> provides proportionate evidence to demonstrate that meeting the EUI target of 35 kWh/m2/year on individual dwellings is technically feasible at reasonable cost on all the residential typologies modelled.</p> <p>ECC considers the clause introduces an unhelpful 'loophole' that may be exploited and cause delay in the development management process. We consider there is existing sufficient flexibility at the planning application stage for planning decisions to consider material considerations – which may include justification for why there is an exceptional</p>	<p>Delete point ii of Requirement 3 of Core Policy 22.</p> <p>ii. on larger sites in exceptional circumstances this may be met as a site-wide residential average (weighted by floor area), provided that no single dwelling has an EUI of >60kWh/m2/yr</p> <p>The inclusion of point ii weakens the policy approach and it is unclear what these exceptional circumstances might be, how a site wide average would be evidenced and demonstrated, what the implications are including for future residents, and why a larger residential site would not be able to meet the policy whereas a smaller site can.</p>	Y	NO Can be considered as part of the ongoing process.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan	Reason	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			circumstance for a large residential development to not meet the EUI target on every building and instead seek a site wide average approach instead.			
63	Core Policy 22 – Net Zero Operational Carbon Development	3. N	<p>1. - Positively prepared 3 - Effective 4 - Consistent with National Policy</p> <p>ECC are currently developing a Renewable Energy Offsetting Framework this is in the final production, and therefore if it is UDC's intention to utilise the County fund it is essential emerging policy facilitates its expenditure appropriately.</p> <p>The criteria to guide the spending of the energy offset fund administered by ECC will be set out and agreed with participating local authorities, and the priority to deliver the additional renewable energy generation capacity geographically close to the contributing development. However, there may be circumstances where the most suitable project is across the administrative boundary of the district but within the County. To enable flexibility in the spending of the energy offset fund administered by the ECC it is recommended the last sentence of the ** clause in Policy 22 be amended to include '<u>or County</u>'.</p>	<p>Amend Core Policy 22, clause ** as follows.</p> <p>"Where it is demonstrated to the satisfaction of the Local Planning Authority that meeting Requirement 4 is not technically feasible, then renewable energy generation on-site should be maximised as much as possible and the residual amount of renewable energy generation (equivalent to the shortfall in meeting the annual energy consumption of the building in kWh/yr) must be offset by a financial contribution (to cover the administration, purchasing and installation of a PV renewable energy system elsewhere in the Plan area <u>or County</u>, which is able to generate a similar amount of energy) and be paid into the Council's offset fund."</p>	Y	<p>NO</p> <p>Can be considered as part of the ongoing process.</p>
64	Core Policy 22 – Net Zero Operational Carbon Development (ZS)	Correction	For clarity an amendment is required.	<p>Amend part B of Core Policy 22 as follows.</p> <ol style="list-style-type: none"> Delete "<i>Appendix 8</i>" and replace with "<i>Appendix 10</i>". Reference is given to "Table 2" but there are two table 2's in the Appendix 10 – update and amend accordingly. 	N	No, but can be included in Additional Modifications Schedule.
65	Para 9.27	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Policy 22 only refers to one alternative route to policy compliance using certified Passivhaus standards, and that is only partial compliance.</p>	Delete reference to " <i>BREAAM</i> " in paragraph 9.27 as it is not a route to policy compliance.	Y	<p>NO</p> <p>Can be considered as part of the ongoing process.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			BREAAM (although useful for addressing wider sustainability matters) is not an acceptable route to compliance with the policy and this is also made clear in Appendix 10. Paragraph 9.27 as written implies that BREAAM is an acceptable alternative route to policy compliance, which it is not. This must be deleted.			
66	Para 9.27 and Para 9.30, page 151	CORRECTION	For clarity an amendment is required.	Paragraphs 9.27 and 9.30 reference "Appendix 8" this must be replaced with "Appendix 10" for both paragraphs.	N	YES (see above) UDC 62 (9.27 and 9.30/ 151)
67	Para 9.31	CORRECTION	For clarity an amendment is required.	1. Remove the duplicated reference to 'Essex Design Guide'. 2. Insert a footnote linking to the Essex Design Guide Climate Change and Historic Environment guidance mentioned - The link is: https://www.essexdesignguide.co.uk/media/2700/climate-change-and-the-historic-environment.pdf	N	YES UDC 63 (9.31/ 152)
68	Core Policy 24 – Embodied Carbon, Para 9.43	CORRECTION	For clarity an amendment is required. There are typos in paragraph 9.43. <ul style="list-style-type: none"> RIGS should be RICS (Royal Institution of Chartered Surveyors). "On Click LCA" should be <u>One Click LCA</u>. 	Amend paragraph 9.43 as follows. <ul style="list-style-type: none"> Remove reference to "RIGS" and replace with "RICS"; and Remove "On Click" and replace with "One Click". 	N	YES UDC 65 (9.43/9.44/ 155)
69	Core Policy 24 – Embodied Carbon, Para 9.44	CORRECTION	For clarity an amendment is required. There is a typo in paragraph 9.44. RIGS should be RICS.	Amend paragraph 9.44 as follows. <ul style="list-style-type: none"> Amend "RIGS" to "RICS". 	N	YES (as above) UDC 65 (9.43/9.44/ 155)
70	Core Policy 24 – Embodied Carbon,	CORRECTION	For clarity an amendment is required. There is a typo in policy wording in the last sentence. "Appendix 8" should be "Appendix 10".	Amend Core Policy 24 so that "Appendix 8" is deleted and replaced with "Appendix 10".	N	YES UDC 67 (CP24/157)
71	Core Policy 24 – Embodied Carbon	3. N	3 - Effective 4 - Consistent with National Policy	Amend Core Policy 22 to read as follows. A. 'Upfront' embodied carbon emissions (RICS modules A1-A5)	Y	NO Can be considered through ongoing process.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			To enhance clarity regarding whether under or over the target is desirable insert 'or less' after the targets in the Policy clause A and B.	i. Residential: 500kgCO ₂ e/m ² or less ii. Non-Residential: 600kgCO ₂ e/m ² or less B. Total embodied carbon (All RICS modules A-C except B6 and B7) i. Residential: Semi-detached and detached: 1,100kgCO ₂ e/m ² or less ii. Residential: Terraces and apartments: <1,000kgCO ₂ e/m ² or less iii. Non-residential: 970kgCO ₂ e/m ² or less		
72	Core Policy 24 – Embodied Carbon	3. N	<p>4 - Consistent with National Policy</p> <p>ECC supports the inclusion of Core Policy 24 to tackle embodied carbon emissions from new development in Uttlesford.</p> <p>The policy is needed to ensure that the carbon emissions embodied in the materials, transportation and construction process of new development are minimised. These emissions are not currently regulated at a national level yet account for a significant proportion of carbon emissions coming from the Built environment. Forward thinking local authorities are starting to use planning policy to fill this gap and align with local and national climate targets.</p> <p>However, ECC considers that there is a need to object as the policy can be strengthened to enhance the contribution to local climate targets. In Essex, collaboratively working has continued to broaden the 'net zero carbon development' evidence base and develop a recommended planning policy approach towards tackling embodied carbon emissions.</p> <p>An Essex-wide study focused on embodied carbon emissions from new development was commissioned. This study was led by the Climate and Planning Unit at ECC in collaboration with the 15 local authorities of Greater Essex, with funding</p>	<p>1. Insert a reference to –</p> <ul style="list-style-type: none"> <i>Essex Embodied Carbon Policy Study – June 2024 - https://www.essexdesignguide.co.uk/climate-change/essex-embodied-carbon-policy-study/</i> <i>The Study report - https://www.essexdesignguide.co.uk/media/2981/essex-embodied-carbon-policy-study-technical-evidence-june-2024.pdf</i> <p>2. Amend Core Policy 22 threshold levels to be consistent with the published Essex Embodied Carbon Policy Study as follows -</p> <ul style="list-style-type: none"> Third paragraph – replace “Major” with “All”. “Major All new-build proposals¹⁰⁵ should identify the steps taken to reduce the building or overall development’s impact on embodied carbon e.g. regarding its design and building materials to minimise embodied carbon.” 	Y	<p>NO</p> <p>Can be considered through ongoing process.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>from the Essex Climate Action Commission. It was undertaken by a consortium of five industry-leading expert consultancies.</p> <p>The Essex Embodied Carbon Policy Study (June 2024) sets out –</p> <ul style="list-style-type: none"> • detailed policy recommendations, • justification for the policies, and • the evidence to demonstrate technical feasibility and cost implications. <p>UDC should reference the Essex Study to further strengthen the technical evidence base underpinning the Core Policy 24.</p> <p>The policy can be strengthened by amending the threshold levels used, for example:</p> <ul style="list-style-type: none"> • The third paragraph applies to major new build development, whereas the Essex Study recommends that all new buildings should demonstrate that upfront embodied carbon has been considered and reduced where possible through the design process and selection of materials. • The third paragraph, part Ai) applies to large scale residential schemes (100+ dwellings), whereas the Essex Study recommends this applies to major residential development (10+ dw). <p>ECC acknowledges that Core Policy 24 has targets for non-residential uses, and this is supported. Attention is also drawn to the forthcoming (expected end Sept 2024) UK Net Zero Carbon Building Standard initiative work with regard to non-residential development targets.</p>	<ul style="list-style-type: none"> • Fourth paragraph – replace “large scale new-build development” with “major new build residential” “Proposals for large-scale new-build developments major new build residential (a minimum of 100 dwellings or a minimum of 5000m2 of non-residential floor space) must submit a Whole Life Carbon Assessment that demonstrates the following targets have been met:” 		
73	Renewable Energy Infrastructure – Paragraph 9.50 and Core Policy 25	3. N	<p>4 - Consistent with National Policy</p> <p>ECC objects and recommends that the supporting text for paragraph 9.50 and Core Policy 25 be amended to reflect the policy guidance set out in the <u>Policy Statement on Onshore Wind</u> (dated 8th July 2024).</p>	Amend paragraph 9.50 and Core Policy 25 to reflect the guidance set out in the <u>Policy Statement on Onshore Wind</u> (dated 8 th July 2024).	N	NO Can be addressed through Additional Modifications

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan	Reason	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
74	Paras 9.54 and 9.66	3. N	4 - Consistent with National Policy The NPPF glossary definition for 'sustainable transport modes' includes reference to car sharing. It is recommended that the Local Plan is amended to promote and facilitate car sharing. As this is likely to be a key change in travel behaviour seen by future communities nationally and in particular in locations like Uttlesford where the private car is dominant.	1. Amend paragraph 9.54, second sentence to read as follows - - <u>"...including public transport and car sharing."</u> 2. Amend paragraph 9.66 to read as follows- <u>"...and car sharing between drivers."</u>	N	YES UDC 69 and 70 (9.54 and 9.66/ 161 and 163)
75	Para 9.84 and Core Policy 27 (ii)	3. N	3 - Effective 4 - Consistent with National Policy ECC considers that the paragraph is unclear with regards to the delivery of highway mitigation. It is important to note that as stated in the ECC Developers' Guide to Infrastructure Contributions, highway mitigation is undertaken by the developer rather than receipt of financial contributions.	Amend paragraph 9.84 and Core Policy 27 (ii) to state – <u>"Highway mitigation should be delivered directly by the developer via Section 278 having regard to the ECC Developers' Guide for Infrastructure Contributions. In exceptional circumstances pooled contributions may be required where mitigation cannot be apportioned to a single allocation/development"</u> .	Y	YES UDC 71 (CP27/170) MAIN
76	Core Policy 27	3. N	3 - Effective 4 - Consistent with National Policy An amendment is required to ensure due regard is given to the ECC Highways Development Management Policy DM20, which states <i>"The Highway Authority will protect the safety and efficiency of the highway network by ensuring that a Construction Traffic Management Plan is submitted and agreed with the Highway Authority prior to commencement of development"</i> (DM20 – page 16). The need for a Construction Management Plan is also clearly articulated within the ECC <u>Development Construction Manual</u> (2024). To ensure this is done, the wording of the policy must be amended to ensure consideration is given to construction traffic management, before and after condition surveys where appropriate.	Amend Core Policy 27 to include the following – <u>"A Construction Management Plan is submitted and agreed with the Highway Authority prior to commencement, with before and after condition surveys as appropriate"</u> .	Y	YES UDC 71 (CP27/170)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
77	Para 9.91 – 9.96 Core Policy 28	3. N	3 - Effective 4 - Consistent with National Policy The supporting text and Core Policy 28 can be strengthened with reference to guidance published by Sport England. This would support and link to Core Policy 52. Sport England have prepared the Sport England Active Design Principles , which outlines principles to ensure environment design can assist to more physically active and healthy lifestyle choices. It is important to note that this checklist has been adapted and embedded into the Essex Healthy Places Guidance comprising part of the Essex Design Guide. It is also recommended that the policy cross reference Core Policy 66: Planning for Health, and how applicants will need to demonstrate the application of Core Policy 28 within the design and access statement, Health Impact Assessment and associated Active Design checklist.	Amend paragraphs 9.91 to 9.96 and Core Policy 28 to reference information from the Essex Healthy Places Guidance (Essex Design Guide) and Sport England Active Design Principles, which will enhance and strengthen policy delivery. Furthermore the policy can positively link with Core Policy 66: Planning for Health.	Y	NO Unnecessary. Could potentially be considered through Additional Modifications process.
78	Core Policy 28, page 173	3. N	3 - Effective 4 - Consistent with National Policy Promoting and ensuring active travel – walking and cycling – for new schools is a key requirement in their location and operation and in doing so delivers local plan objectives. ECC's Developers' Guide for Infrastructure Contributions provides clear guidance on the environment expected around schools and states – <i>“Establishing a safe environment around schools, which is conducive to learning is paramount. Substantial traffic free public realm around school entrances used by pupils must be incorporated into development plans, whilst ensuring access for emergency vehicles. Such areas do not form part of the school itself and, for the avoidance of doubt, public realm abutting roads and/or parking are not</i>	Amend Core Policy 28 by adding an additional paragraph stating – <i>“To deliver a safe environment around schools, and facilitate walking and cycling, new schools must front on to substantial pedestrianised public realm that does not abut roads or parking.”</i>	Y	NO Unnecessary duplication. Adequately covered by existing wording.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>considered traffic free. It is also important to promote the provision of healthy school streets, by:</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 street zones' where motor traffic is controlled 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>facilitating full and equal access for pupils with disabilities;</i> • <i>providing public art, outdoor gym equipment, 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" (page 41).</i> <p>New schools must front on to substantial pedestrianised public realm that does not abut roads or parking. To ensure due regard is provided to this guidance, the policy wording should be amended accordingly.</p>			
79	Para 9.106	OBJECT 1. Y 2. XXX 3. N	4 - Consistent with National Policy To ensure due regard is given to the <u>Essex Parking Standards</u> prepared by the Essex Planning Officers' Association (EPOA) all cycle parking "must be - <ul style="list-style-type: none"> • secure and covered; • conveniently located adjacent to entrances to buildings; • enjoy good natural observation; • easily accessible from roads and/or cycle routes; 	Amend paragraph 9.106 to ensure that all future cycle parking is delivered to reflect the Essex Parking Standards wording, namely – "All cycle parking must be – <ul style="list-style-type: none"> • be secure and covered; • be conveniently located adjacent to entrances to buildings; • enjoy good natural observation; 	N	YES UDC 73 (CP31/178) MAIN

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<ul style="list-style-type: none"> well lit; and located so it does not obstruct pedestrian and cycle routes" (para 3.6.2) <p>It is important to note that a review of the Essex Parking Standards (Part 1) and Essex Garden Communities and Large-Scale Developments Parking Guidance (Part 2) have been subject to two consultations with LPAs and developers. These were approved by EPOA in September 2024, and then presented for formal adoption by ECC and each LPA thereafter.</p> <p>The Essex Parking Standards (2009) have been reviewed by EPOA to</p> <ul style="list-style-type: none"> reflect changes in the new Use Class Orders and national planning policy; and set different standards in different areas based on levels of accessibility, namely Town Centres (highly accessible); Rural (poorly accessible); and other areas (Moderately accessible). <p>Details also cover electric vehicle charging requirements for both residential and non-residential uses. More detailed design guidance is also provided for both residential and commercial cycle parking taking account of LTN 1/20 guidance. Once these standards have been approved it is expected that they will be a material consideration to which new development will need to have regard to at an early stage of the design process.</p>	<ul style="list-style-type: none"> be easily accessible from roads and/or cycle routes; be well lit; and be located so it does not obstruct pedestrian and cycle routes". 		
80	Core Policy 31, page 178	3. N	<p>4 - Consistent with National Policy</p> <p>The current policy wording states - <i>'Educational developments, including new schools and expansions, should deliver secure parking for cycles and other wheeled vehicle storage for school pupils, staff and visitors and parents.'</i></p> <p>ECC appreciates that parking is provided for cycles and scooters et al, parents using other 'wheeled vehicles' are not allowed to enter school sites. Active travel should be the main method of 'drop-</p>	<p>Amend Core Policy 31, third paragraph to read as follows –</p> <p><i>"Educational developments, including new schools and expansions, should deliver secure parking for cycles, scooters and the like, and other wheeled vehicle storage for school pupils, staff, and visitors and parents."</i></p> <p>This will remove ambiguity that this may include vehicles.</p>	Y	<p>NO</p> <p>Unnecessary. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			off' and car parking for parents will not be provided except for those with additional mobility needs. It is advised that due regard is given to the ECC Developers' Guide to Infrastructure Contributions in particular pages 21-22 and Appendix D - entitled Exemplar Layout for Education and Community Facilities.			
81	Core Policy 34, Water efficiency heading, page 186 Paragraphs 9.123 and 9.124	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>The Water Strategy for Essex (prepared by ECC and partners) recommends that Local Plan policies should set ambitious policies for water efficiency and resilience for new homes and non-residential development to reduce the impact of water security. Essex is a 'Seriously Water Stressed Area'. It is noted that Core Policy 34 and the supporting text support a water efficiency standard below the Building Regulations optional requirement for water efficiency of 110 litres/person/day and "supports" rather than "requires" "at least a water efficiency standard of 90 litres per person per day".</p> <p>The recently published DEFRA Plan for Water has considered mandating 100 l/p/d in seriously water stressed areas, such as Essex. The Future Homes Hub recently produced the Water Ready: A report to inform Government's roadmap for water efficient new homes, published in April 2024, which sets recommended water efficiency targets for 2025-2035 for water stressed areas from 90-80 l/p/d.</p> <p>The policy should set a <u>mandatory</u> water efficiency target of 80 litres per person per day to future proof new development. The target in the policy of 90 litres is not mandatory and schemes that reach this target will be 'supported'. There is no incentive or requirement for anything below Building Regulations.</p> <p>The policy requirements for non-residential development should achieve <u>full</u> credits for category Wat 01 of BREEAM, rather than three.</p>	Amend Core Policy 34 and supporting text to require all new residential development to achieve a standard of 80 litres per person per day and non-residential development to achieve full credits for category Wat 01 of BREEAM unless considered impractical considering a phased approach.	Y	NO The Council does not object to a lower standard in principle but notes that it is not currently supported by evidence.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
82	Core Policy 34	3. N	3 - Effective 4 - Consistent with National Policy ECC is the Lead Local Flood Authority (LLFA) and encourages new developments to look for ways to harvest rainwater for re-use and move away from the use of foul and combined sewers to discharge surface water. The LLFA will not support developments that propose to connect surface water to foul sewers as these systems can become overwhelmed, increasing the risk of flooding and pollution occurring. This should be stated in policy.	Amend Core Policy 34, under 'Infrastructure' to read as follows – "The Council will expect new development to connect to mains foul drainage and will restrict the use of non-mains drainage for foul water disposal, in line with Environment Agency and Lead Local Flood Authority guidance. The location of, and likely impact on, the private water supplies within the District must also be taken into account."	Y	YES UDC 76 (CP34/186)
83	Para 9.143, page 191 Core Policy 36, page 192	3. N	3 - Effective 4 - Consistent with National Policy ECC as the Lead Local Flood Authority seeks two amendments to Core Policy 36. 1. In accordance with NPPF paragraphs 173 and 175, ECC as Lead Local Flood Authority require the policy to include an additional point that makes specific reference to the use of sustainable drainage systems (SuDS). This will assist in reducing and managing flood risk and ensures alignment with the explanatory text and Core Policy 37 Sustainable Drainage Systems. 2. LLFA require more information to be added to the paragraph around the need for FRA's and Drainage Strategy documents. All new developments should be supported by an FRA (as noted in Core Policy 38) but the paragraph and policy fails to require a Drainage Strategy to evidence how the development will mitigate flooding on and off site. This should have regard to the Sustainable Drainage Systems Design Guide for Essex and also links to Core Policy 36.	Amend Core Policy 36 by adding two additional paragraphs as follows, <u>"vi. Use sustainable drainage systems (SuDS) for the management of surface water and where possible increase biodiversity and amenity"</u> <u>"Proposals must include a Drainage Strategy to evidence how the development will mitigate flooding on and off site. This must have regard to the Sustainable Drainage Systems Design Guide for Essex."</u>	Y	YES UDC 83 (CP36/192) MAIN
84	Paragraph 9.148, page 193	3. N	3 - Effective 4 - Consistent with National Policy ECC as Lead Local Flood Authority require a statement to be added to paragraph 9.148 to ensure	Amend paragraph 9.148 to state <u>"SuDS should be included as part of the Landscape Strategy and early engagement with the Lead Local Flood</u>	Y	YES UDC 85 (9.148/193)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan	Reason	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
		1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy			
			joined up thinking across the matters relevant to SuDS and consideration of opportunities to make the most of options available.	<u>Authority is encouraged to ensure all opportunities to increase amenity, biodiversity and multifunctional areas have been considered.</u>		
85	Paragraph 9.149, page 193	3. N	3 - Effective 4 - Consistent with National Policy ECC as Lead Local Flood Authority require the wording around the use of large infiltration and attenuation basins and when they are acceptable needs to be revised.	Amend paragraph 9.148 to include the following text. <u>"Although the Lead Local Flood Authority does not support infiltration basins within contaminated ground, large infiltration basins are acceptable within areas where high water tables are found, as lined SuDS features are acceptable should site conditions allow."</u>	Y	NO Inconsistent with national policy.
86	Paragraph 9.151, page 193	3. N	3 - Effective 4 - Consistent with National Policy ECC draws attention to CAA Guidance, and recommends that the paragraph be amended to reflect guidance, as it states "LPAs to consult with an officially safeguarded aerodrome whenever a development of a specified height is proposed within the colour-coded area and 13km (bird attractant) circle depicted on a safeguarding map. This formalises the consultation process and ensures an aerodrome receives an opportunity to comment on any development that may affect its existing or future safe operation" (para 2.2).	Amend paragraph 9.151 to include the following text. <u>"London Stansted Airport should be consulted regarding any new development within 13km of the airport, to ensure early input into the viability and requirements of the SuDS proposed."</u>	Y	YES UDC 88 (9.151/193) MAIN
87	Core Policy 37, page 194 – 1 st paragraph	3. N	3 - Effective 4 - Consistent with National Policy The first paragraph in the policy states, <i>"All major development will be required to use sustainable drainage systems (SuDS) for the management of surface water run-off, unless it can be demonstrated to be inappropriate or there would be significant harm to water quality, flood risk or biodiversity."</i>	Amend Core Policy 37, first paragraph to delete the following text. <u>"..., unless it can be demonstrated to be inappropriate or there would be significant harm to water quality, flood risk or biodiversity"</u>	Y	NO Inconsistent with national policy.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			ECC as Lead Local Flood Authority (LLFA) does not agree with this statement. By giving the option of not using SuDS "unless it be demonstrated that it is inappropriate or significant harm to water quality, flood risk or biodiversity" is open to interpretation and will give rise to challenge where SuDS should be encouraged. The policy does not stipulate how "inappropriate" will be assessed and what evidence is required. With the multitude of SuDS options available there is always the opportunity for them to be incorporated. SuDS in their essence reduce flooding and improve water quality/biodiversity. This is clearly evidenced in the Essex SuDS Design Guide.			
88	Core Policy 37, page 194	3. N	3 - Effective 4 - Consistent with National Policy ECC as Lead Local Flood Authority (LLFA) do not support point v. The LLFA will not support developments that propose to connect surface water to foul sewers as these systems can become overwhelmed, increasing the risk of flooding and pollution occurring. The ability for exceptions to this requirement should be removed.	Amend Core Policy 37, point v to read as follows – "v. surface water connections to the public sewerage network <u>are not supported by the Lead Local Flood Authority as these systems can become overwhelmed, increasing the risk of flooding and pollution occurring</u> should only be made where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users."	Y	NO Inconsistent with national policy.
89	Core Policy 37, page 194	3. N	3 - Effective 4 - Consistent with National Policy See justification to paragraph 9.151.	The airport should be consulted regarding any new development within 13km of the airport, to ensure early input into the viability and requirements of the SuDS proposed. Amend Core Policy 37 to include the following text. <u>"London Stansted Airport should be consulted regarding any new development within 13km of the airport, to ensure early input into the</u>	Y	YES UDC 88 (CP37/194)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				<u>viability and requirements of the SuDS proposed.</u>		
90	Para 9.154	3. N	3 - Effective 4 - Consistent with National Policy The paragraph refers to "County Wildlife Sites" but these sites are not referred to within Essex, and therefore the Local Plan is introducing an element of confusion. There is also confusion concerning statutory and non-statutory sites. The wording must be amended to ensure clarification and consistency with national policy designations.	Amend paragraph 9.154, first sentence to read as follows - <i>"Important sites within Uttlesford include the statutorily protected national designations (<u>National Nature Reserve, Sites of Special Scientific Interest, SSSIs, Local Nature Reserves, and the non-statutorily protected Local Wildlife Sites, Local Geological Sites and Special Roadside Verges</u> Local Nature Reserves and County Wildlife Sites."</i>	N	YES UDC 90 (9.154/195)
91	Para 9.154 Para 9.160 Para 9.174	3. N	4 - Consistent with National Policy The paragraph must reference the <u>Natural Environment and Rural Communities Act</u> (NERC) noting that changes have been adopted in September 2024, due to the Environment Act (2021). A review must be undertaken and amendments made to the Local Plan to ensure consistency.	Review the NERC and amend the supporting text/relevant policies to ensure consistency with the provisions.	N	Unclear what is being proposed. Relevant policies also commented on by Natural England/ Environment Agency etc and amendments made as appropriate.
92	Para 9.155	3. N	4 - Consistent with National Policy There is no reference to Local Nature Reserves.	Amend paragraph 9.155 to include reference to Local Nature Reserves within UDC.	N	NO Unnecessary duplication. Adequately covered by existing wording.
93	Para 9.157	3. N	4 - Consistent with National Policy The NPPF states "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists" (para 186). The paragraph should be amended to ensure there is an appreciation of the provisions clearly set out within the NPPF.	Amend paragraph 9.157 to including the following – <ul style="list-style-type: none"> <u>"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are exceptional reasons"</u>. 	N	NO Unnecessary duplication. Adequately covered by existing wording. Relevant policies also commented on by Natural England/ Environment Agency etc and amendments made as appropriate.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
94	Para 9.158	3. N	4 - Consistent with National Policy See response to para 6.61.	Amend paragraph 9.158 by deleting "Habitat Sites" and replace with " <u>other ecological sites</u> ".	N	YES UDC 91 (9.158/196)
95	Core Policy 38	3. N	4 - Consistent with National Policy There is no reference to Local Nature Reserves; Special Roadside Verges; and Local Geological Sites, which would ensure compliance with the NPPF (Para 180 (a), Para 181 and Para 185 (a)). Core Policy 38 must be amended. Policy provisions must provide clearer guidance to hierarchical protection, specifically referencing NNRs and SSSIs which should not be developed- to ensure consistency with the NPPF (Para 186) and Wildlife and Countryside Act, as amended. Irreplaceable habitats should also be referenced in the bullets (as per NPPF). Priority species should be specifically referred to in order to meet strengthened biodiversity duty under NERC Act as amended. Core Policy 38 must be amended to include additional provisions that are consistent with para 186 of the NPPF.	Amend Core Policy 38 by - <ul style="list-style-type: none"> deleting reference in clause (ii) to "nationally designated" and amend to "<u>statutory designated</u>" and add "<u>Local Nature Reserves</u>". deleting reference in clause (iii) to 'Locally Designated' and amend to "non-statutory designated sites" and amend the examples to read "<u>Local Wildlife Sites, Local Geological Sites and Special Roadside Verges</u>". <p>After the second paragraph within Core Policy 38, add the following wording consistent with paragraph 186 of the NPPF –</p> <ul style="list-style-type: none"> <u>"Development will be refused if it is likely to have an adverse effect on an SSSI, any loss or deterioration of irreplaceable habitats consistent with provisions in the NPPF"</u>. <p>Within the existing fourth paragraph of Core Policy 38 amend as follows –</p> <ul style="list-style-type: none"> <u>....which may include Biodiversity Offsetting off-site Biodiversity Net Gain,"</u> <p>Review the policy given the updates within the NERC Act – see ECC views to - Para 9.154, Para 9.160, and Para 9.174.</p>	N	YES UDC 93 (CP38/198) Note: Amendment also informed by comments from Natural England and National Trust. MAIN
96	Core Policy 38	3. N	4 - Consistent with National Policy	Amend Core Policy 38 to include the following –	N	YES UDC 93 (CP38/198)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			To ensure consistency with national guidance, the policy should be amended to ensure that planning applications subject to mandatory BNG shall require a <u>Biodiversity Gain Plan</u> . The plan must be submitted and approved in writing by the local planning authority before commencement. Where significant biodiversity net gains are expected the submission of a <u>Habitat Management and Monitoring Plan</u> will be required as a pre-commencement condition/ reserved matters.	<ul style="list-style-type: none"> Insert – <u>“Planning applications subject to mandatory BNG shall require a Biodiversity Gain Plan. The plan must be submitted and approved in writing by the local planning authority before commencement”.</u> Insert – <u>“Where significant biodiversity net gains are expected the submission of a Habitat Management and Monitoring Plan will be required as a pre-commencement condition/reserved matters”.</u> 		Note: Amendment also informed by comments from Natural England and National Trust. MAIN
97	Core Policy 39	3. N	3 - Effective 4 - Consistent with National Policy The policy under 'Protection of Priority Habitats' refers to the <i>“Defra Biodiversity Metric”</i> . This should be amended to use the correct terminology and refer to <i>“Statutory Biodiversity Metric”</i> .	Amend Core Policy 39 under 'Protection of Priority Habitats' by deleting <i>“Defra Biodiversity Metric”</i> ; and replacing with <i>“Statutory Biodiversity Metric”</i> .	N	NO Can be considered through Additional Modifications process if necessary.
98	Core Policy 39 and Para 9.177	3. N	3 - Effective 4 - Consistent with National Policy The policy and paragraph must be amended to use the correct terminology, currently it refers to <i>'Nature Recovery Strategies'</i> whereas it should be <i>'Local Nature Recovery Strategies'</i> .	Amend Core Policy 39 and paragraph 9.177 by inserting <i>“Local”</i> to read <i>“Local Nature Recovery Strategies”</i> .	N	YES UDC 96 (9.177/204)
99	Core Policy 39	3. N	4 - Consistent with National Policy The policy fails to include reference to the need to produce a Landscape and Ecological Management Plan (LEMP). In relation to the policies requirement for stewardship arrangements, a LEMP is a site-specific document detailing the immediate and long-term commitments to manage the planting, protection and enhancement of biodiversity in and around a development site. The measures within the LEMP are in accordance with wildlife legislation, National Planning Policy	Amend Core policy 39 by adding a paragraph after the second paragraph on page 203 stating – <u>“Where appropriate a Landscape and Ecological Management Plan (LEMP) must be prepared detailing the management and maintenance of green infrastructure assets and green spaces for the lifetime of the development”.</u>	N	YES UDC 95 (CP39/202) MAIN

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			Framework and other local plans and planning policies. ECC also expect details on how management companies consider the maintenance of GI assets and green spaces, for the lifetime of the development.			
100	Para 9.178	3. N	4 - Consistent with National Policy The paragraph should be amended to use the correct terminology and refer to " <u>Statutory Biodiversity Metric</u> " instead of " <u>Defra Metric</u> ".	Amend paragraph 9.178 by deleting " <u>Defra Metric</u> "; and replacing with " <u>Statutory Biodiversity Metric</u> ".	N	YES UDC 97 (9.178/204)
101	Core Policy 44	3. N	3 - Effective 4 - Consistent with National Policy ECC stated at the Regulation 18 Local Plan consultation, that this policy must be amended to ensure education is considered as a noise sensitive land use. The ECC Developers' Guide for Infrastructure Contributions and site suitability criteria for schools state that "outdoor noise on school sites should not exceed 55db LAeq (30 min)" (page 149). It is important for the learning environment that this is adhered to.	Amend Core Policy 44 to state - " <u>Outdoor noise on school sites should not exceed 55db LAeq (30 min)</u> ".	Y	YES UDC 103 (CP44/213) MAIN
Chapter 10 – Economy and Retail						
102	Footnote 161, page 224	CORRECTION	Correction ECC draws attention to the Essex Developers' Guide to Infrastructure Contributions which has been updated in 2024. The weblink needs to be updated.	Footnote 161 – delete current weblink and replace with the following – • https://www.essex.gov.uk/sites/default/files/2024-07/Developers%20Guide%202024.pdf	N	YES UDC 104 (Footnote 161/224)
103	Para 10.51 – 10.53, page 234	3. N	3 - Effective 4 - Consistent with National Policy The supporting text should reference the <u>Tackling Obesity: Government Strategy</u> , which sets out actions to tackle obesity and help adults and children live healthier lives. Reference should also be given to the <u>Office for Health Improvement and Disparities</u> evidence highlighting the importance of planning for healthier	Amend paragraphs 10.51 to 10.53 that support Development Policy 6 to include reference to – • " <u>Tackling Obesity: Government Strategy</u> " and • " <u>Office for Health Improvement and Disparities</u> ".	N	YES UDC 106 (10.51/234)

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			weight environments to strengthen delivery of the policy.			
Chapter 11 – Building Healthy and Sustainable Communities						
104	Core Policy 52, page 246	3. Y	4 - Consistent with National Policy There is scope for lower thresholds and greater implementation beyond residential, for the use of design review elements of the policy. This would support NPPF paragraph 158. The current threshold in the policy is stated as "50 dwellings or more". ECC note that the Uttlesford Quality Review Panel was set up for all forms of development not limited to residential. In addition, the aims of the panel are to aid all major development (all development over 10 dwellings or 0.5ha or more for residential. For non-resi, 1000m2 or 1ha or more).	Amend Core Policy 52 so that requirements for the use of Design Review can apply to all forms of development and the policy provides flexibility to include a lower residential threshold, and other types of development (namely employment).	N	NO Unnecessary. Adequately covered by existing wording.
105	Paras 11.16 & 11.17, page 248	3. N	3 - Effective 4 - Consistent with National Policy The term " <i>specialist housing</i> " is referenced within paragraphs 11.16 and 11.17. For completeness and factually accuracy the term " <i>supported</i> " must also be included. This will allow the promotion of inclusion and equality across the housing sector. This is consistent with wording provided in Core Policy 54. A clearer definition in the glossary is advised.	Amend paragraphs 11.16 and 11.17 to read " <i>specialist and supported housing</i> ". A clearer definition in the glossary is advised.	Y	YES UDC 109 and 110 (11.16 and 11.17/ 248)
106	Para 11.19, page 248	3. N	3 - Effective 4 - Consistent with National Policy Paragraph 11.19 states " <i>New housing must support the needs of the community as a whole by including affordable and market homes of the type, size and tenure needed by residents. However, housing mix can have implications, both for development feasibility and viability as well as for local character</i> ". ECC draws attention to the <u>ECC Housing Strategy 2021-24</u> which includes an outcome to see new	Amend paragraph 11.19 to ensure the delivery of M4 (3b) homes is prioritised when negotiating S106 affordable housing schemes, which supports the delivery of Core Policy 53, as follows. <u>"The delivery of M4 (3b) homes will be prioritised when negotiating S106 affordable housing schemes as the delivery of such housing enables people to age in place; provides better outcomes as homes do not have to be adapted (adaptations are never a good</u>	Y	NO Unnecessary. Adequately covered by existing wording.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>homes and places that are designed for residents to live independent and healthy lives.</p> <p>CC considers it is important to manage the mix of housing provided on new developments, the appropriate approach should also achieve a practical balance. The level of flexibility for developers may have a detrimental effect on meeting the housing needs of residents who require an M4 (3a/b) property within the affordable/social tenure. Evidence shows that more residents living with a disability or poor mobility are more likely to live in the social sector. See Disability and housing, UK - Office for National Statistics (ons.gov.uk).</p> <p>To address this issue the delivery of M4 (3b) homes must be prioritised when negotiating S106 affordable housing schemes, as the delivery of such housing enables people to age in place; provides better outcomes as homes do not have to be adapted (adaptations are never a good as homes designed to meet changing needs) and is a longer term cost effective measure. They can also have a positive effect in the wider market, freeing up family sized housing. This would support the delivery of Core Policy 53.</p>	<p><i>as homes designed to meet changing needs) and is a longer-term cost effective measure. They can also have a positive effect in the wider market, freeing up family sized housing".</i></p>		
107	Para 11.20 and Core Policy 53	3.N	<p>3 - Effective</p> <p>The information set out in para 11.20, table 11.1 and Core Policy 53 implies that 3 and 4+ properties are intended to be delivered for older people. ECC queries the evidence to support how 3 and 4+ bedroom homes will be age restricted to meet the housing needs of older people.</p>	<p>ECC queries the evidence to support how 3 and 4+ bedroom homes will be age restricted to meet the needs of older people and seeks clarification on this issue for effective delivery.</p>	N	<p>NO</p> <p>It is considered that ECC have misunderstood the policy).</p>
108	Para 11.23 and Core Policy 53	3. N	<p>3 - Effective</p> <p>Paragraph 11.23 states "... the Council will encourage developers to build new homes that are M4(2) compliant..."</p> <p>The use of the word 'encourage' is not sufficiently robust to ensure that all homes are built to meet this standard. It is also inconsistent with Core Policy</p>	<p>1. Amend Core Policy 53, fourth paragraph, first sentence to read as follows - <i>"The Council expect requires all residential schemes to be 100% M4(2) Compliant"</i></p>	Y	<p>NO</p> <p>UDC satisfied with existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			53 which states <i>"The Council expect all residential schemes to be 100% M4(2) compliant."</i>	2. Amend paragraph 11.23 to align with modified wording in Core Policy 53.		
109	Core Policy 54	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Core Policy 54 states <i>"Strategic housing sites will be expected to provide at least 5% of the proposed dwellings as extra care housing or sheltered/retirement housing185 (C3 Use Class) as part of the overall mix."</i></p> <p>It is unclear how this policy will be delivered and if it will be viable. There is a risk 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. This policy does not accord with ECC's Extra Care model which requires a total of 60 units to meet the market's viability requirements. In order to deliver 60 units, strategic housing sites will need to provide at least a total of 1,200 homes to meet this policy (60/0.05)</p> <p>The policy 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 amenities or staff and thus, does not appear to meet UDC's overall objective.</p> <p>Extra Care homes can be delivered as rented homes and there is a need for Extra Care at affordable/social rents in Uttlesford. Core Policy 54 should therefore also specify the delivery of Extra Care for different tenures. The delivery of affordable supported and specialist housing schemes, including Extra Care is supported and would benefit the wider community if this was a priority within this plan to meet the need in Uttlesford.</p>	<p>Amend Core Policy 54 to include details as to when the specialist or supported housing should be delivered. The 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>Extra Care homes can be delivered under tenancies, and there is a need for Extra Care at affordable rents in Uttlesford. Core Policy 54 should specify delivery of Extra Care under different tenures.</p>	Y	<p>NO</p> <p>Unnecessary. Adequately covered by existing wording.</p>
110	Core Policy 54	3. N	<p>3 - Effective 4 - Consistent with National Policy</p>	1. Amend paragraphs 11.25 to 11.27 and Core Policy 54 to ensure consistency with national policy and	Y	NO

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>ECC welcomes a specific policy related to 'supported and specialist' and paragraph 11.28. However, ECC with its responsibilities under the <u>Care Act 2014</u>, is concerned that Core Policy 54 is not compliant with NPPF para 63 (page 17) and national planning practice guidance.</p> <p>The policy appears to imply that only older people require such housing and does not appear to address the matters expected in the NPPF (para 63). National policy highlights that needs and provision of housing must address the needs of other cohorts. Specialist and supported housing (SSH) is needed to meet the housing needs of a wide variety of residents with different housing needs across all ages, including looked after children. The need for SSH housing should include, but not limited to, the following people living with/who are:</p> <ul style="list-style-type: none"> • disabled (physical and/or, sensory impairments), • learning disability and autism, • mental health, • older people, • residents leaving institutions such as the care sector, prison, or hospital, • survivors of domestic abuse, • people who require supported housing due to their homelessness, and • children's homes for looked after children. <p>Paragraphs 11.25 to 11.27 and Core policy 54 should be revised to be consistent with the following –</p> <p>National Guidance and Policy</p> <ul style="list-style-type: none"> • Care Act 2014 • NPPF (para 63) (both 2023 and draft 2024 version) • May 2023 Minister of Housing Statement - making it clear that <i>"the planning system should not be a barrier to providing homes for the most vulnerable children in society."</i> The 	<p>regard to county guidance, reflecting that specialist and supported housing is needed to meet the housing needs of a wide variety of residents with different housing needs across all ages, not just older people.</p> <p>2. To support this amendment the definition of "supported housing" in the glossary should be updated to "supported and specialist housing" and include the following - <i>"including, but not limited to, the following people living with/who are –</i></p> <ul style="list-style-type: none"> • <i>disabled (physical and/or, sensory impairments),</i> • <i>learning disability and autism,</i> • <i>mental health,</i> • <i>older people, residents leaving institutions such as the care sector, prison, or hospital,</i> • <i>survivors of domestic abuse,</i> • <i>people who require supported housing due to their homelessness, and</i> • <i>children's homes for looked after children".</i> 		<p>Unnecessary. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>statement noted that “<i>Local planning authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area</i>”.</p> <p>County Policy/Guidance</p> <ul style="list-style-type: none"> ECC Developers' Guide to Infrastructure Contributions (Appendix J) EPOA's Essex Design Guide / Ageing Population ECC Extra Care Design Guide 2023 ECC Supported Living Accommodation Standards ECC Design Guide for LD Complex Needs Accommodation for Adults with Disability 			
111	Para 11.36, page 254 Core Policy 56	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Extra Care homes can be delivered as rented homes and there is a need for Extra Care at affordable/social rents in Uttlesford. The Local Plan should support the delivery of Extra Care for different tenures and would benefit the wider community if this was a priority within this plan to meet the need in Uttlesford.</p>	Amend paragraph 11.36 and Core Policy 56 to ensure Extra Care homes can be delivered under tenancies, and at affordable rents.	Y	NO Unnecessary. Adequately covered by existing wording.
112	Para 11.89, page 276 Para 11.92, 277	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>See justification for para 6.14 referring to the Local Plan being more inclusive for wider age cohorts. It is recommended that the paragraphs be amended accordingly.</p>	<p>Amend paragraphs to read as follows,</p> <ul style="list-style-type: none"> Para 11.89 to read – “<i>Enable and support healthy lifestyles through the delivery of high-quality considered design, where people have resilience to cope with life's changes across the life course</i>”. Para 11.92 to read – “the social, economic, and environmental factors that shape the <i>people's lives quality and length of life</i>”. 	Y	YES UDC 113 (11.89/276)
113	Paras 11.89 11.92, page 276-277	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Paragraph 11.89 states the following.</p>	Amend paragraphs 11.89 to 11.92 to provide clearer references to the <u>Uttlesford Health and Wellbeing Strategy</u> and articulating the priorities of this, which then links to the statutory	Y	NO Unnecessary. Adequately covered by existing wording.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p><i>"Across Uttlesford wards, there is however, a six-year gap in healthy life expectancy at birth for males and a nine year gap for females¹⁹⁹. This highlights the importance of resourcing and delivering universal services at a scale and intensity that is proportionate to the degree of need. By planning for strategic scale growth to 2041 the Local Plan can support this ambition by securing infrastructure to address the needs of new development, including the delivery of new health facilities or financial contributions towards such facilities. This is in accordance with the Uttlesford Health and Wellbeing Strategy²⁰⁰."</i></p> <p>The paragraph is supported but the Uttlesford Health and Wellbeing Strategy is far more and indeed the focus is far from the <i>"delivery of new health facilities or financial contributions towards such facilities"</i>, which is implied.</p> <p>There should be clearer references to the local Health and Wellbeing Strategy and articulating the priorities of this, and within the supporting text for Core Policy 66, which then links to the statutory Joint Essex Health and Wellbeing Strategy. Both local and county strategies work in together to provide joined up approaches to tackling health inequalities and improving health.</p> <p>Including the above would strengthen the policy justification and reflect a truer picture of the health and wellbeing issues in Uttlesford District. This could be included in a new paragraph or amending paragraphs 11.89 to 11.92.</p>	<p>Joint Essex Health and Wellbeing Strategy. Both local and county strategies work in together to provide joined up approaches to tackling health inequalities and improving health.</p> <p>Including the above would strengthen the policy justification and reflect a truer picture of the health and wellbeing issues in Uttlesford District. This could be included in a new paragraph or amending.</p> <p>Amend paragraph 11.92 to refer to the <u>Uttlesford Health and Wellbeing Strategy 2023-2028</u>, as well as the JSNA.</p>		
114	Figure 11.1, page 277	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>There is no explanation of why Figure 11.1 is included in the plan, what it is trying to convey and its link to policy. An additional paragraph should be included which provides an explanation.</p>	<p>Include an additional paragraph to explain Figure 11.1 as follows. <i>"Figure 11.1 demonstrates that although medical care is critically important, things like the quality of our schools, affordability and stability of our housing, access to good jobs with fair pay and the safety of our neighbourhoods can keep us healthy"</i></p>	Y	<p>NO</p> <p>Unnecessary. Adequately covered by existing wording.</p>

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				<i>in the first place. Within the wider determinants of health we know that health and wellbeing outcomes are significantly worse for specific groups impacted by inequality."</i>		
115	Para 11.66	3.N	3 - Effective Proposals to introduce energy efficiency and renewable energy measures can only be "approached positively" if informed by an understanding of the heritage asset. A holistic, whole building, fabric-lead approach is best practice, i.e. sensitively upgrading fabric prior to installing more harmful renewable energy sources. To assist in the adoption of such an approach the Local Plan can refer to the guidance within the Essex Design Guide on Climate Change and the Historic Environment as this provides an appreciation of a whole building, fabric-lead approach.	Amend paragraph 11.66 to include an additional sentence as follows – • <u>"Consideration must be given to the Essex Design Guide on Climate Change and the Historic Environment, that sets out best practice approach to understanding heritage assets"</u> .	N	YES UDC 111 (11.66/268)
116	Core Policy 62 (i)	3. N	4 - Consistent with National Policy Core Policy 62, point (i) should be simplified to refer to the building's setting or attributes of its setting which contribute to its significance, rather than referring to curtilage and context. 'Setting' is the surroundings in which a heritage asset is experienced (as defined in the NPPF) and this must be incorporated to make this bullet point clearer. The proposed amendment and language proposed in the modification aligns with the definitions of setting and best practice (see Historic England's GPA3: The Setting of Heritage Assets).	Amend Core Policy 62, by deleting the current text for point I, and replacing with the following – • <u>"respect the buildings historic setting and/or attributes of its setting which contribute to its significance, and"</u>	N	NO Amendments made as appropriate in accordance with comments from Historic England.
117	Para's 11.74 – 11.77 and Core Policy 63	3.N	4 - Consistent with National Policy Within the supporting policy text there is a reliance on guidance within Conservation Area Appraisals. It is therefore vital that all appraisals are robust and up to date. Historic England best practice advises that appraisals should be updated every 5 years and there is a statutory duty to update them. Given that	Amend Core Policy 63 to include the following wording – • <u>"Conservation Area Appraisals must be updated/reviewed every 5 years"</u> .	N	NO Unnecessary. UDC does have funds or resource to meet this proposed commitment.

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			these are being relied upon the policy must be strengthened to ensure a commitment to review and update the Conservation Area Appraisals.			
118	Para's 11.85	3.N	4 - Consistent with National Policy The balancing exercise noted refers to para.209 of the NPPF but has been misquoted – the balance is between the scale of harm or loss and the significance of the asset. Not the significance of the harm.	Amend the policy wording to state - • <i>“balancing the scale of harm against the significance of the heritage asset”.</i>	N	NO Amendments made as appropriate in accordance with comments from Historic England.
119	Core Policy 66	3. N	4 - Consistent with National Policy This representation outlines four amendments for Core Policy 66. 1. The policy outlines the type of development subject to a Health Impact Assessment (HIA). The Essex Healthy Places Guidance applies to application of 50+ dwellings, 1,000m ² or more any use class, and C2 use class. The policy omits C2 and should be included. This would align the Uttlesford Local Plan policy with other adopted local plans in Essex such as Epping Forest (2023), Brentwood (2022), Braintree (2022), Colchester (2022) and Tendring (2022). The Inspectors' report for the Tendring Local Plan (Section 2) covering this matter can be found here where the Inspector recommended the inclusion of “all development in Use Class C2” within the HIA policy. 2. Reg 19 Local Plan Development Policy 6 Hot Food Takeaways requires proposals for 'sui generis' hot food takeaways to be supported by a HIA. This should also be stated in Core Policy 66. 3. To be in accordance with Government Guidance, namely Health Impact Assessment in Spatial Planning , ECC as the lead advisor for Public Health recommends that the policy be amended to secure relevant stakeholder and community	Amend Core Policy 66 as follows. 1. Include <i>“all development in Use Class C2 (Residential Institutions)”</i> and <i>“sui generis' hot food takeaways”</i> within second paragraph, bullet point i,, as uses requiring a full HIA. 2. Include the following additional bullet points under the “Health Impacts should...” section of the policy. • <i>“The scope of the Health Impact Assessment is agreed with the council's development management and public health prior to commencement of the assessment and at the earliest opportunity.</i> • <i>The assessment is undertaken at an early stage of the development process and there is clear demonstration that the assessment has informed the overall design of the proposal.</i> • <i>The assessment is undertaken in accordance with Essex Healthy Places Guidance and responds to the latest local</i>	Y	YES UDC 115 (CP66/278) MAIN

ECC Rep Reference	Uttlesford Publication - Regulation 19 Version Local Plan Reference	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan legally compliant and sound	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>engagement. Early engagement ensures that the HIA can inform proposals effectively.</p> <p>4. Point iii of the policy refers to the JSNA. This is not the only document applicable to health and wellbeing in Uttlesford District and the policy should include other reference such as the Uttlesford Health and Wellbeing Strategy and Essex Joint Health and Wellbeing Strategy.</p> <p>There should also be an alignment with the local validation list, and consideration of how this policy will be monitored in the AMR or equivalent framework – and that detailed in Appendix 18 of the Reg 19 Local Plan. For example, the number of HIAs completed and those that positively shape proposals.</p> <p>It is also noted that many of the weblinks in the section do not 'work' and should be amended accordingly.</p>	<p><i>public health data and community insight gathered by the applicant's team</i>.</p> <p>3. Amend point iii, to read as follows – “addressing local health issues, outcomes, and needs, as detailed in the JSNA <i>and articulated in local health policy context e.g., Uttlesford Health and Wellbeing Strategy and Essex Joint Health and Wellbeing Strategy</i>”</p>		
Chapter 12 – Monitoring and Implementation						
120	Core Policy 71 and Appendix 18: Monitoring Framework	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Strategic Objective 10 of the Local Plan states “<i>Help sustain existing and deliver new local community facilities, education, sport, leisure, open space, health, and retail provision through development to promote healthy, attractive, sustainable, and safe communities.</i>”</p> <p>Within the monitoring framework as mentioned in Core Policy 71 and detailed in Appendix 18, it fails to reference Core Policy 66 entitled Planning for Health and Development and Policy 6 entitled Hot Food Takeaways. These two policies should be included in the monitoring framework as they deliver Strategic Objective 10 and monitoring will assist in the delivery of the Uttlesford Health and Wellbeing Strategy etc.</p>	<p>Amend the Monitoring Framework to ensure that relevant policies for the delivery of Strategic Objective 10 include –</p> <ul style="list-style-type: none"> • “<i>Core Policy 66 - Planning for Health; and</i> • <i>Development Policy 6 - Hot Food Takeaways</i>”. 	Y	YES UDC 145 (Appendix 18/ 48)

Appendix 2 – ECC Responses to UDC Appendices 1 – 4 Site Templates UDC Local Plan (July, 2024)

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
Introduction						
General Requirements for all strategic sites						
121	Pages 5-7 – General Requirements for All Strategic Sites	3. N	3 - Effective 4 - Consistent with National Policy To ensure consistency with the NPPF, ECC recommends that the "General Requirements for All Sites" ensures that there is an appreciation of the contribution to economic development. This would be consistent with the NPPF, as this highlights the importance of delivering economic, social and environmental objectives; where economic objectives demonstrates this is important for the planning system "to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure" (para 8).	Amend the "General Requirements for All Sites" to explicitly " <u>consider contribution to economic development</u> ".	N	NO Unnecessary. Unclear what mechanism exists to enable such a contribution from 'any' development proposal, how it would be calculated or what would be expected.
122	Page 6 – Transport	3. N	4 - Consistent with National Policy The NPPF states - "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails" (para 104). The general site requirements must be strengthened to ensure that Public Rights of Way (PRoW) are appropriately protected and there is an opportunity where appropriate to enhance.	Amend 5 th bullet to read as follows - "Safeguard <u>and improve</u> PROW".	Y	YES UDC 119 (Appendix 2-4 Transport Bullet 5/6)
123	Page 7 - Green Infrastructure and Biodiversity	3. N	4 - Consistent with National Policy To ensure consistency with Core Policy 39, the general site requirements on page 7 should also refer to the GBI Plan. Furthermore to be consistent with the Environment Act, this section must also include reference to a Biodiversity Gain Plan, and for significant BNG a Habitat Management and Monitoring Plan is required.	Amend this section of the site templates to include reference to – " <u>A Green and Blue Infrastructure Plan, and Biodiversity Gain Plan, and/or for significant BNG a Habitat Management and Monitoring plan, must be prepared and submitted to the Local Planning Authority</u> ".	N	YES UDC 120 (Appendix 2-4 Introduction Green Infrastructure and Biodiversity/ 7)

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
124	Page 7 – Green Infrastructure and Biodiversity	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>ECC recommends that due regard is given to the Local Nature Recovery Strategy (LNRS) for Greater Essex.</p> <p>The LNRS was introduced in the Environment Act 2021 and is a statutory requirement. It is part of Nature Recovery Network (NRN), comprising of 48 Local Nature Recovery Strategies, collectively these form a nationwide network. The LNRS is designed to -</p> <ul style="list-style-type: none"> • deliver the necessary action to reverse the current path of decline in our biodiversity bring about a recovery for nature; • find locations for the creation of habitat. • identify the locations likely to provide the greatest benefit for nature and the wider environment. <p>ECC is the Responsible Authority appointed to deliver the LNRS for this location, in collaboration with the Essex Local Nature Partnership (LNP). A <u>draft Greater Essex LNRS</u> is currently being consulted, and the emerging Local Plan must ensure it reflects this emerging guidance.</p>	Amend this section to ensure that consideration is given to the Greater Essex LNRS.	N	NO Unnecessary. Adequately covered by existing wording.
125	Page 7 – Flood risk and drainage, page 7	3. N	ECC is the Lead Local Flood Authority and applicants should liaise with the LLFA to ensure flood risk and surface water drainage issues have been addressed.	Amend the fourth bullet to read as follows – <ul style="list-style-type: none"> • “Liaise with the Environment Agency and the Lead Local Flood Authority to sure that flood risk and surface water drainage has been appropriately considered and mitigated.” 	Y	YES UDC 121 (Appendix2-4 Introduction Flood Risk and Drainage Bullet 4/ 7)
Appendix 2 – North Uttlesford Site Development Template – Saffron Walden						
127	Framework Plan 2a – Saffron Waldon, page 9	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>The last bullet under the Transport heading states ‘<i>any school frontage to be traffic-free with wider school zone and links to active travel routes</i>’. As shown the education land sits on the main vehicular route through the development. This does not reflect the above bullet, nor is it conducive with a high-quality environment around the school and contradicts Core Policy 28. The ECC Developers’</p>	Framework Plan 2a – Saffron Waldon Plan 2A must be amended to show a pedestrianised school frontage and a wider school street zone. School proposals will need to comply with the ECC Developers’ Guide to Infrastructure Contributions.	Y	NO Unnecessary. Adequately covered by existing wording.

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			Guide to Infrastructure Contributions (page 41) sets out the expected environment around schools (page 41) and the site suitability criteria. The school frontage must be traffic free. See ECC comment to Core Policy 28.			
128	Page 8 – Design Principles	3. N	2. Justified ECC acknowledges that the Council has updated the economic evidence to inform the Local Plan, including the <u>Employment Land Needs Report</u> (2023). This report concludes for Saffron Walden up to 2041 “ <i>there is limited existing employment land provision. The allocation of some additional land (up to 5 ha) would therefore be warranted through the Local Plan having regard to current provision and to support sustainable development</i> ” (para 6.13). ECC welcome an understanding as to why the framework for Saffron Walden is only proposing 2.5ha, rather than 5ha, which would be consistent with the evidence base.	ECC welcomes a greater quantum of employment land at Saffron Walden and/or evidence to support the lower figure of 2.5ha.	N	NO N/A. Evidence identifies a need for ‘up-to’ 5 ha at Saffron Walden. Furthermore, the Local Plan is providing for some headroom overall.
129	Page 10 – Transport	3. N	3 - Effective 4 - Consistent with National Policy ECC as Highway Authority recommends that UDC discuss and agree the precise route of the Spine Road to ensure it conforms with national and County transport policy (bullet 4). Furthermore bullet 6, should be amended as the speed limit will be appropriate for the road/environment and determined by the Highway Authority.	ECC recommends that UDC enter discussions with ECC as Highway Authority to agree the route of the proposed spine road. Amend bullet 6 to read as follows – • <i>“speed limit will be appropriate for the road/environment and determined by the Highway Authority”.</i>	Y	NO Unnecessary duplication of National Policy.
130	Page 11- Transport	3. N	3 - Effective 4 - Consistent with National Policy It must be noted that Bullet 9 references Tiptofts Lane which is a byway and therefore may require Traffic Regulation potentially to ensure it may be used effectively with the proposed development. ECC queries the Bullet 10 reference to “byway” as it is considered this should be “bridleway” or “cycleway” - clarification is sought.	ECC recommends that bullets 9 and 10 require further clarification with ECC as Highway Authority and amendment.	Y	See Separate Comments
Appendix 2 – North Uttlesford Site Development Template – Chesterford Research Park						
131	Framework Plan 2A - Saffron Walden	Correction	Correction. Correct mistitled reports in bullets 1 and 9.	1. Amend Bullet 1	N	YES

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
	Infrastructure section, bullets 1 and 9 (page 12)			The correct title is the "Essex County Council Developers' Guide to Infrastructure Contributions " 2. Amend Bullet 9 Change "Waste Infrastructure Assessment" to "Waste Infrastructure Impact Assessment ".		UDC 123 (Appendix 2a Infrastructure Bullets 1 and 9/ 12)
132	Page 14 – Landscape (bullet 2)	3. N	4 - Consistent with National Policy The text within the bullet must be amended to comply with <u>Government Standing Advice on Ancient Woodland, ancient trees and veteran trees.</u>	Amend bullet 2 to read as follows - <i>"Landscape and Ecology:</i> <ul style="list-style-type: none"> • <i>Avoid degradation of the Ancient Woodland and Local Wildlife Site at Emmanuel Wood by ensuring a sufficient at least a 15m buffer to the woodland from all development, including from lighting and noise".</i> 	N	YES UDC 124 (Appendix 2b Landscape Bullet 2/ 14)
Appendix 3 – South Uttlesford Site Development Template – Takeley						
133	Framework Plan 3A – Takeley, page 17	3. N	3 - Effective 4 - Consistent with National Policy Two points are made on the school/education land. 1. Framework Plan 3A shows the safeguarded education land and the primary school site is separated from the secondary school by a PROW. For pupil safety, this not conducive with the delivery of an all-through school. See ECC comment to Core Policy 14. 2. Both the primary and secondary education land sits on the main vehicular route through the development, severing it from the vast majority of homes in the settlement. This is not conducive with a high-quality environment around the school(s) and contradictory to Core Policy 28. As set out in ECC Developers' Guide to Infrastructure Contributions (page 41) the school frontage must be traffic free. Furthermore the secondary land also abuts Stortford Road. Refer to ECC representation in relation to Core Policy 28.	1. Amend Framework Plan 3A to show a unified school campus suitable for an all-through school, and consistent with the ECC site suitability criteria in the ECC Developers' Guide to Infrastructure Contributions. This will also ensure compliance with and bullet 2 under 'Infrastructure' for the Takeley site. 2. Amend Framework Plan 3A as follows - <ul style="list-style-type: none"> • a revised alignment of spine road – removing the barrier to active travel; • ensure the requirements for pedestrianised school frontage are met; and • identify a wider school street zone. 	Y	See Separate Comments

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
134	Page 18 - Transport	3. N	3 - Effective 4 - Consistent with National Policy For clarity and to ensure delivery of appropriate transport infrastructure, further information must be provided within the transport section.	ECC recommends that 2 new bullets must be included - <ul style="list-style-type: none"> <u>"Acknowledge upgrade/improvement of highway junctions may be required"</u> <u>"Contributions/improvement to the Fritch Way may be required."</u> 	Y	YES UDC 125 (Appendix 3a Transport New Bullet/ 18)
135	Page 19 – Heritage bullet 1	3. N	4 - Consistent with National Policy The moated site is medieval in date and is appreciated within an agrarian landscape. This must be preserved and enhanced within any master planning proposal.	Amend bullet 1 under Heritage to include the following – <u>"The moated site is medieval in date and is appreciated within an agrarian landscape. This must be preserved and enhanced within any master planning proposal"</u>	N	NO Unnecessary. Adequately covered by existing wording.
136	Page 19 – Heritage bullet 5	3. N	3. Effective To ensure the protection of the Protected Lane it is recommended that the bullet be amended to ensure no new vehicular accesses are created onto the road.	Amend bullet 5 to state – <u>"The Protected Lane should retain its rural setting and no new vehicular access created onto the road"</u>	N	NO Unnecessary. Adequately covered by existing wording.
137	Framework Plan 3A – Takeley Infrastructure section (page 21 bullet 6 and 7)	3. N	3 - Effective 4 - Consistent with National Policy The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out in Policy S8 of the Minerals Local Plan (MLP) and Policy 2 of the Waste Local Plan (WLP) or their future equivalents. Furthermore, ECC aims to ensure that emerging guidance uses the same terminology as County Waste and Mineral Local Plan policy. For this reason the title of the report needs to be amended to refer to 'Waste Infrastructure Impact Assessment' and "Minerals Infrastructure Impact Assessment."	Amend bullets 6 and 7 to read as follows – <ul style="list-style-type: none"> Change "Waste Infrastructure Assessment" to <u>"Waste Infrastructure Impact Assessment"</u> Change "Mineral Infrastructure Assessment" to <u>"Mineral Infrastructure Impact Assessment"</u> Include an additional bullet stating <u>"Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters"</u> 	N	YES UDC 128 (Appendix 3a Infrastructure/ 21)
Appendix 3 – South Uttlesford Site Development Template – Great Dunmow						
138	Framework Plan 3B – Great Dunmow, page 23	3. N	3 - Effective 4 - Consistent with National Policy	Amend Framework Plan 3B – Great Dunmow to show the 'Education Facility' and be consistent with the	Y	YES To be added.

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>The 'key' includes reference to an 'Education Facility,' however, the mapped information fails to include a site allocation.</p> <p>This is contradictory to page 27 which correctly refers to a 'New 2.1ha Primary School & Early Years and Child Care sites should be located close to the local centre and bus loop and be positioned within a traffic-free 'school zone' and be well connected to safe walking and cycling routes'.</p> <p>Refer to ECC representation in relation to Figure 6.2, Core Policy 10.</p>	current key. It must allocate the indicative land for the education facility within Great Dunmow. Also see ECC representation in relation to Figure 6.2, Core Policy 10.		
139	Great Dunmow Transport, page 24	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Note ECC representations related to Core Policy 10 (Table 6.1) and Figure 6.2, page 89, in relation to the Church End Bridge. Further evidence must be provided on the suitability of the Church End Bridge given current weight restrictions.</p> <p>Reference must also be given to the B1256 junction with Braintree Road - this a casualty reduction site and will require mitigation for development to proceed.</p>	<p>1. Further evidence must be provided on the suitability of the Church End Bridge given current weight restrictions. In preparing evidence, the technical approval process in accordance with CG300 must be followed by the applicant/site promoter to ensure any conclusions are valid. Engagement with ECC as the Highway Authority must take place. The following are key items to address.</p> <ul style="list-style-type: none"> • Approval in Principle (AIP) for Assessment must be undertaken / agreed with the Technical Approval Authority (TAA). This will confirm material properties and analysis methods to be used in the assessment. • There may need to be additional testing to confirm the classification of the primary elements as early steel, not cast iron. Again, this would be discussed and agreed with the TAA at AIP stage. • The Assessment report will need to be accompanied by Assessment & Check certification. 	Y	See Separate Comments

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
				2. Include an additional bullet point that references the B1256 junction with Braintree Road - this a casualty reduction site and will require mitigation for development to proceed.		
140	Framework Plan 3B - Great Dunmow – • Site A and B – Infrastructure (page 27) • Site C – Infrastructure (page 29)	3. N	3 - Effective 4 - Consistent with National Policy The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out in Policy S8 of the Minerals Local Plan (MLP) and Policy 2 of the Waste Local Plan (WLP) or their future equivalents.	Amend the infrastructure sections (pages 27 and 29) to include the following - • <u>“Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters”.</u>	N	YES UDC 130 (Appendix 3b Infrastructure/ 17 and 29)
141	Land North of Taylors Farm, Takeley Street, page 30	3. N	3 - Effective 4 - Consistent with National Policy There is an inconsistent referencing to the Use Class Order and clarity is required. • The subheading 'Proposed Uses' at the top of the page refers to E(g)(iii) but design principles <u>excludes</u> E(g)(iii); and • E(g)(i) and E(g)(iii) uses permitted but E(g)(ii) uses are not listed.	1. Amend design principles to include E(g)(iii) uses. 2. Consider permitting E(g)(ii) uses.	N	YES UDC 132 (Appendix 3c Design Principles/ 30)
142	Land North of Taylors Farm, Takeley Street, Transport, page 30	3. N	3 - Effective 4 - Consistent with National Policy The last bullet in the 'Transport' section must include reference to the provision/option for 'developer works' (i.e. S278) for direct delivery for completeness.	Amend the last bullet to read as follows – • <u>“Contributions <i>and/or developer works</i> are required to transport and highway infrastructure as identified in the IDP.”</u>	Y	YES To be added.
143	Framework Plan 3C - Land North of Taylors Farm, pages 30 - 32	3. N	3 - Effective 4 - Consistent with National Policy The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out	Amend the site template to include an 'Infrastructure' heading, and to ensure conformity with the Minerals and Waste Local Plans, include the following – • <u>“Undertake a Waste Infrastructure Impact Assessment to meet County Waste Local Plan policy requirements, given proximity to Taylors Farm for Inert Recycling”.</u>	N	YES UDC 135 (Appendix 3d/ 34)

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			in Policy S8 of the Minerals Local Plan (MLP) and Policy 2 of the Waste Local Plan (WLP) or their future equivalents. Given the proximity of the site to Taylors Farm Inert Recycling, a Waste Infrastructure Impact Assessment must be undertaken to conform with County Waste policy. The Local Plan must be amended to reflect this within the site template.	<ul style="list-style-type: none"> • <u>"Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters"</u>. 		
Appendix 3 – South Uttlesford Site Development Template – Land South of A120 and north of Stortford Road, Great Dunmow						
144	Land South A120 and north of Stortford Road, Great Dunmow, page 33	3. N	1. - Positively prepared 4 - Consistent with National Policy There is an inconsistent referencing to the Use Class Order and clarity is required. It is noted that E(g)(i) and E(g)(iii) uses are listed as 'Proposed Uses' at the top of the page, but E(g)(ii) uses are not listed.	ECC recommends inclusion of E(g)(ii) uses.	N	Noted
145	Page 33	3.N	3 - Effective 4 - Consistent with National Policy The last bullet in the 'Transport' section must include reference to the provision/option for 'developer works' (i.e. S278) for direct delivery for completeness.	Amend the last bullet to read as follows – <ul style="list-style-type: none">• <u>"Contributions <i>and/or developer works</i> are required to transport and highway infrastructure as identified in the IDP."</u>	Y	YES UDC 134 (Appendix 3d Transport/ 33)
146	Framework Plan 3D - Land south of A120 and north of Stortford Road (page 34)	3. N	3 - Effective 4 - Consistent with National Policy The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out in Policy S8 of the Minerals Local Plan (MLP) and Policy 2 of the Waste Local Plan (WLP) or their future equivalents.	Amend the site template to include an 'Infrastructure' heading, and to ensure conformity with the Minerals and Waste Local Plans, include the following – <ul style="list-style-type: none">• <u>"Undertake a Minerals Resource Assessment"</u>.• <u>"Undertake a Mineral Infrastructure Impact Assessment given its proximity to Highwood Quarry"</u>.• <u>"Undertake a Waste Infrastructure Impact Assessment given its proximity to Highwood Quarry for Inert Waste Recycling"</u> and• <u>"Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters"</u>.	N	YES UDC 136 (Appendix 3d/ 34)

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
Appendix 4 – Stansted Mountfitchet and Elsenham Site Templates						
147	Stansted Mountfitchet Framework Plan 4A Heritage, page 38	3. N	4 - Consistent with National Policy Bullet 3 under the Heritage heading. Pennington Lane is a Protected Lane forming the western and northern side of the development. It is recommended that bullet 3, state that no new vehicular accesses are created onto the road.	To ensure the protection of the Protected Lane it is recommended that the bullet 3 be amended to ensure no new vehicular accesses are created onto the road.	N	YES UDC 136 (Appendix 4a Heritage/ 38)
148	Stansted Mountfitchet, Framework Plan 4A Infrastructure, page 41	3. N	3 - Effective 4 - Consistent with National Policy The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out in Policy S8 of the Minerals Local Plan (MLP) and Policy 2 of the Waste Local Plan (WLP) or their future equivalents.	Amend the 'Infrastructure' section to include the following - <u>"Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters"</u> .	N	YES UDC 138 (Appendix 4a/ 39)
149	Elsenham Framework Plan 4B Transport, page 41	3. N	3 - Effective 4 - Consistent with National Policy See ECC representation to Core Policy 16 relating to Elsenham. Grove Hill is a recognised constraint and must be considered in emerging policy. Clarification on the transport evidence base it related to Elsenham is also required.	Include mitigation for Grove Hill as an additional bullet. ECC seeks clarification from UDC on the transport evidence and how additional development can be accommodated in view of the constraints at Grove Hill junction.	N	See separate comments.
150	Elsenham Framework Plan 4B Infrastructure, page 42	3. N	3 - Effective 4 - Consistent with National Policy Two changes are required to the 'Infrastructure' section. 1. ECC draws attention to the NPPF which states - <i>"For plan-making this means that – a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"</i> (para 11). It is therefore important that the template is amended to reflect this guidance, as 'Infrastructure' must not	1. Amend the bullet under the 'Infrastructure' heading as follows - • "Education facility – expansion of safeguarded site to the south of the allocation, <u>to 2.1ha in total, to allow for an expanded facilitate construction of a new primary school with and co-located early years and childcare provision, with detailed requirements subject to consultation with Essex County Council"</u> 2. Include two additional bullets as follows -	Y	YES UDC 139 (Appendix 4b Infrastructure/ 42)

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally compliant	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
			<p>refer to an 'expanded primary school' given there is no school on the site at present, and the additional land is required to make a new school viable and accommodate the scale of growth proposed. Land must be specified to avoid doubt. Reference also needs to be made to early years and childcare, not just early years.</p> <p>2. The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out in Policy S8 of the Minerals Local Plan (MLP) and Policy 2 of the Waste Local Plan (WLP) or their future equivalents.</p>	<ul style="list-style-type: none"> • <u>Undertake a Minerals Resource Assessment.</u> • <u>Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters.</u> 		
151	Elsenham Framework Plan 4C, p44	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out in Policy S8 of the Minerals Local Plan (MLP) and Policy 2 of the Waste Local Plan (WLP) or their future equivalents.</p>	<p>Amend the site template to include an 'Infrastructure' heading, and to ensure conformity with the Minerals and Waste Local Plans, include the following –</p> <ul style="list-style-type: none"> • <u>"Undertake a Waste Infrastructure Assessment given its proximity to Loppingdales for Inert Waste Recycling".</u> • <u>"Liaise with ECC as the Minerals and Waste Planning Authority on mineral and waste matters".</u> 	N	<p>YES UDC 140 (Appendix 4c/ 46)</p>

Appendix 3 – ECC Responses to UDC Regulation 19 Local Plan Appendices 5 – 19 and; the Policies Map

See page 66.

DRAFT

ECC Rep Reference	'Publication' Regulation 19 Version Local Plan Site Templates Reference Section, Paragraph, Policy/Map	Is the 'Publication' Local Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Publication Local Plan sound/legally complaint	Participation at examination Y/N (if seeking modifications)	Inclusion in 'Proposed Modifications' Schedule December 2024 (Proposed Modification number/ Paragraph (or Policy) Number/ Page Number)
Appendix 7: Safeguarded Land for Education Uses in relation to Core Policies 14 and 18						
152	Page 12	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>It is unclear what status 'safeguarded land' has and how it would be secured for education use at an acceptable cost.</p> <p>The 'safeguarded' land at Takeley is split from the Secondary School Land by a PROW. This is extremely sub-prime and presents pupil safety issues and layout constraints.</p> <p>The 'safeguarded' land at Forest Hall abuts the M11. This part of the area is likely to experience unacceptable noise levels (+55db LAeq 30) and air quality may also be poor. It is unclear why land to the west of the school buildings, which is most likely to meet the suitability criteria set out in ECC's Developers' Guide to Infrastructure Contributions, has been omitted.</p> <p>No land areas are stated (i.e. hectares) and it is unclear how much additional capacity could be supported by either site.</p> <p>See ECC representations to Core Policy 14 and 18.</p>	<p>1. Clarify legal status of 'safeguarded land' and set out how this designation will lead to delivery.</p> <p>2. Redefine Takeley safeguarded and allocated education site boundaries to provide a single campus, suitable for an all-through school.</p> <p>3. Provide evidence that safeguarded area is suitable for education use and redefine area as necessary.</p> <p>4. State safeguarded areas in hectares to avoid doubt and allow further analysis.</p> <p>See ECC representations for further evidence to support the delivery and viability of safeguarding education land – Core Policy 14 and 18.</p>	Y	See Separate Comments
Appendix 10 - Additional Notes to Assist Interpretation and Implementation of Climate Change Policies						
153	APPENDIX 10 – Page 17	Correction Required	Appendix 10 – Page 17 – the policy number needs correcting – it refers to Core Policy 23 whereas it should be Core Policy 22 Net Zero Operational Carbon Development.	Correction Required Page 17 – References to Core Policy 23 should be Core Policy 22.	N	YES UDC 142 (Appendix 10/17)
154	Appendix 10 – page 24 and Page 26	Correction Required	There are two table 2s in the Appendix 10 – update and amend accordingly.	Correction Required Amend Table numbers in Appendix 10.	N	YES To be added.
155	Appendix 10 – Page 26	Correction Required	Point of clarification – The technical consultants behind the Essex Net Zero Policy Study have confirmed that the minimum standards identified in Table 2 are applicable to 'detached' dwellings as well. Therefore this could be clarified in the Table.	Correction Required In the 'minimum standards' Table 2 – add 'detached' to the column header 'Terrace, Semi-detached'.	N	YES UDC 144 (Appendix 10/26)
156	Appendix 10	Correction Required	As part of the ongoing work led by the Climate and Planning Unit at ECC, the Essex Net Zero Specifications Guide has been published support the	Correction Required	N	YES To be added.

			<p>delivery of Net Zero Carbon development in Essex that is consistent with the Essex Net Zero planning policy approach and consequently Policy 22 of the UDC Local Plan.</p> <p>The Essex Net Zero Specifications guide contains provides technical information and outlines 'packaged solutions' for different residential typologies.</p>	<p>Consider including reference to the technical specification guidance produced to support delivery of Net Zero policy in Essex: https://www.essexdesignguide.co.uk/climate-change/essex-net-zero-specification/</p>		
Appendix 19 – Glossary						
157	Omission – “all development”	3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>The Minerals and Waste Planning Authority (MWPA) are a statutory consultee and must be consulted on any development within a Mineral Safeguarding Area (MSA), a Mineral Consultation Area (MCA), and/or Waste Consultation Area (WCA) that meets the thresholds set out in Policy S8 of the Minerals Local Plan (MLP) and Policy 2 of the Waste Local Plan (WLP) or their future equivalents.</p>	<p>ECC recommends that 'All Developments' be defined within the Glossary, to make it clear that this <u>does not apply</u> to the County Matters of Minerals and Waste development. The MWPA recommend that a definition of “All development” added to the Glossary to make this clear.</p>	N	NO Can be considered.
158	Omission – “Infrastructure”	3. N	<p>Omission</p> <p>3 - Effective 4 - Consistent with National Policy</p> <p>The Local Plan does not include a definition of infrastructure. This would support effective delivery of a wide range of policies particularly Core Policy 5.</p>	<p>Include the following definition of “infrastructure” within the 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>	N	NO Can be considered.
159	Omission – “supported and specialist housing”	3. N	<p>Omission</p> <p>3 - Effective 4 - Consistent with National Policy</p> <p>The Reg 19 Local Plan makes several references and includes a specific policy related to “supported and specialist housing”, however, that term is not defined and in many cases seems to imply that it is only related to housing for aged/older people. This is not the case and such housing applies to a wide group of people.</p>	<p>Amend the Glossary to include the following definition for “Supported and specialist housing”.</p> <p><i>Supported and specialist housing Includes, but is not limited to, the following people living with/who are –</i></p> <ul style="list-style-type: none"> • <i>disabled (physical and/or, sensory impairments),</i> • <i>learning disability and autism,</i> • <i>mental health,</i> 	N	NO Can be considered.

				<ul style="list-style-type: none"> • <u>older people, residents leaving institutions such as the care sector, prison, or hospital,</u> • <u>survivors of domestic abuse,</u> • <u>people who require supported housing due to their homelessness, and children's homes for looked after children".</u> 		
Policies Map						
160		3. N	<p>3 - Effective 4 - Consistent with National Policy</p> <p>Existing land for education use set out in extant s106 agreements should be formally allocated for F1 use, to ensure the options are safeguarded in the event of any alternative permissions being sought (as per the key point made in ECC response to the UDC housing/education scenario test in April 2024).</p>	Amend policies map and include extant s106 education land in map and policies as appropriate.	Y	<p>NO</p> <p>Can be considered.</p>

DRAFT