

## **Essential Reference Paper 'B'**

### **Uttlesford District Council's Regulation 18 Local Plan Consultation**

East Herts Council endorses the positive and proactive approach taken in the Uttlesford Local Plan to ensure that the identified housing needs are met across the Plan period. The Plan exceeds the needs identified in the recent SHMA update of July 2017 by some 700 homes, thus building in an element of flexibility.

Whilst East Herts Council is generally supportive of the Uttlesford Local Plan consultation document, the Council considers that there are a number of areas of the Plan that require amendment, either in order to make the Plan sound or for clarification and robustness purposes.

#### Table 3.4:

The Windfall Allowance row is titled incorrectly. It should say 2016-2033 as it is the remaining plan period at 70 per year for 17 years.

#### Paragraph 3.68 to 3.70:

The second purpose of the Green Belt is to prevent neighbouring towns merging into one another, not margining.

East Herts Council maintains its view that land to the south of the A120 adjacent to Bishop's Stortford does not meet the purposes of the Green Belt, being surrounded by built development and the bypass, and should be released from the Green Belt and allocated for employment uses.

#### Paragraph 4.7 and 4.37

East Herts Council consider that the Plan is not clear on its approach towards Gypsies and Travellers and Travelling Showpeople, in that the text does not actually identify clearly what the needs are. The Plan describes the number of people interviewed but does not state what number of plots or pitches the Plan requires nor whether there are sufficient allocations to meet these needs. A criteria based policy is insufficient if there are needs to be met. The Plan does not seek to make provision for those who no longer meet the Planning policy for traveller sites definition i.e. Non-Nomadic Travellers. It is therefore recommended that further evidence is undertaken to clarify the position of the 'unknown' households to ensure that appropriate accommodation options are planned for.

#### Policy SP11 – London Stansted Airport:

The policy should make specific mention to junction 8 of the M11. The policy references in Airport development Part 9 that proposals should “incorporate suitable road access for vehicles including any necessary improvements required as a result of the development”. However, no mention is made to the strategic highway network. With the proposed easing of the restriction to the use of the Northern Ancillary Area to non-airport related employment uses, in addition to growth at the airport itself, measures will need to be taken to ensure that the necessary junction upgrades are made in a timely fashion. East Herts Council is committed to working with Uttlesford District Council, Hertfordshire County Council, Essex County Council and the Highways Agency to ensuring that the appropriate mitigation measures are delivered.

#### Paragraph 5.20:

The Plan states there is an aspiration for ‘strategic’ warehouse and distribution depots in locations with ready access to Junction 8 of the M11. Linked to the comment on Policy SP11, such aspirations will need to take account of the cumulative impacts of growth from residential and airport related development within East Herts and Uttlesford districts on the junction and the need to identify appropriate mitigation measures to improve the capacity of the junction.

#### Policy TA3 – Provision of Electric Charging Points for Vehicles:

East Herts Council supports the Council’s approach to encouraging modal shift and making provision for electric vehicle charging points. However, it is considered that Policy TA3 is confusing and not well-related to the supporting text. The wording in this policy in respect of provision for flats (<50 units) does not correspond with the intentions of the preceding paragraph 7.22, which seeks 10% minimum provision. It is therefore unclear whether Policy TA3 intends that there would only be one charging point space per 50 flats or whether there would be at least 10% provision, to accord with paragraph 7.22, via the “(subject to minimum provision as above)” wording. If the latter is the case then the 10% minimum provision should be spelt out specifically within the policy as a reference to supporting text would not constitute formal policy.

In order avoid any other ambiguity in the interpretation of the policy wording it is suggested that ‘One parking bay marked out for use by electric vehicles *only*’ (which may be taken to imply that there would only be one space provided) be replaced with ‘One parking bay marked out *only* for use by electric vehicles’ (*emphasis added for identification purposes*).

#### Policy TA5 – New Transport Infrastructure or Measures:

This policy currently contains a significant amount of wording that would be better placed in supporting text where it relates to measures that have already been implemented. It is suggested that the policy would be better served by splitting out the narrative around these areas to a preceding paragraph and that a more succinct policy, listing only measures yet to be delivered, should be developed.

#### Policy INF2: Protection and Provision of Open Spaces, Sports Facilities and Playing Pitches:

The Plan is unclear what the requirements are for open space for sport and recreation, including built facilities and outdoor playing pitches. Policy INF2 only sets standards for the provision of amenity green space, provision for children and young people and allotments. There is no standard or requirement for sports facilities including indoor facilities or outdoor playing pitches.

#### Policy INF3 – Health Impact Assessments:

Whilst East Herts Council commends Policy INF3 on requiring Health Impact Assessments, it is considered that the policy is limited to health facilities and restricting fast food takeaway uses, but omits other aspects such as the use of design tools to enable preventative health and wellbeing measures such as fit trails, formal and informal recreation, green spaces, street trees and priorities for walking and cycling over vehicle use. The Plan is non-committal on community spaces and places for worship apart from within the rural area.

The Plan contains many policies on design, including on sustainable design, the environment and historic environment, which East Herts Council supports.

#### Policy C2 – Re-use of Rural Buildings:

The last bullet point of Policy C2 Re-use of Rural Buildings referring to change of use of agricultural land to domestic gardens should be removed as this is covered in Policy C3.

#### Policy M1 – Monitoring and Review / Policy M2 – Implementation and Monitoring of Major Projects:

East Herts Council supports the Council's proposed approaches to monitoring the delivery of the Local Plan, in particular the delivery of the three proposed new settlements.