

# Sustainability Appraisal (SA) of the Uttlesford Local Plan

## SA Report Addendum

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## Quality information

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# Non-technical summary

This report presents an appraisal of the proposed Main Modifications (MMs) to the Uttlesford Local Plan (as submitted in December 2024) that are currently published for consultation.

The focus of the report is on: A) introducing the proposed MMs (Section 2); and then B) presenting an appraisal (Section 4). Also, consideration is given to the possibility of defining / appraising reasonable alternatives (Section 3), but the conclusion reached is that there are no reasonable alternatives at the current time.

It is important to be clear that this is an “addendum” report and does not aim to supersede the SA Report (2024). However, consideration is given to whether conclusions presented within the SA Report now require adjustment in light of the appraisal set out in this addendum.

The appraisal presented in Section 4 concludes as follows:

*“The appraisal finds that none of the proposed modifications generate significant effects, either alone or in combination, nor do any of the proposed modifications generate a need to amend the appraisal conclusions previously reached on the Local Plan as a whole within the SA Report (2024).*

*However, a number of proposed modifications are flagged through the appraisal as being of note, including MMs dealing with: removing safeguarded land for a secondary school at Stansted Mountfitchet; reducing the requirements on developers in respect of wheelchair accessible housing; and committing to a separate Gypsy and Traveller Development Plan Document to meet recently identified accommodation needs.”*

# 1 Introduction

- 1.1.1 AECOM is leading on the Sustainability Appraisal (SA) process that is being undertaken alongside preparation of the Uttlesford Local Plan to 2041 (“the Local Plan”).
- 1.1.2 The formally required SA Report was published alongside the final draft (‘proposed submission’) version of the Local Plan in 2024 under Regulation 19 of the Local Planning Regulations.
- 1.1.3 The aim of the SA Report, in accordance with Regulations, was essentially to present an appraisal of “the plan and reasonable alternatives” and “an outline of the reasons for selecting the alternatives”.
- 1.1.4 The Local Plan was then submitted to the Government for Examination in Public in December 2024 alongside the SA Report and all representations received at the preceding Regulation 19 stage.
- 1.1.5 The appointed Planning Inspectors then oversaw Examination Hearings, followed by publication of a post hearings note on 31<sup>st</sup> July 2025, which set out the following in respect of next steps:
- “As discussed with the Council at the conclusion of the hearing, we have asked that a schedule of main modifications be drawn up. That schedule should be based on the modifications suggested by the Council, those discussed during the hearing, and those included in this note.*
- Once that schedule of main modifications is finalised, it will need to be published for consultation for a minimum period of 6 weeks. We will consider any representations made in response to that consultation as part of our examination of the Plan.*
- The schedule is likely to require sustainability appraisal and appropriate assessment under the Habitats Regulations. That work should be carried out prior to the public consultation and the documents published alongside the schedule of main modifications.”*
- 1.1.6 At the current time a schedule of main modifications has been prepared and is published for consultation.
- 1.1.7 The aim of this SA Report Addendum is essentially to present an appraisal of the proposed main modifications (MMs) and reasonable alternatives (just as the fundamental requirement of the SA Report was to present an appraisal of the draft plan and reasonable alternatives, as discussed above).
- 1.1.8 The specific purpose is to inform the current consultation which – it is important to be clear – is focused only on MMs. This report does not aim to re-present information from the SA Report (2024) that is of little or no relevance to the current consultation on MMs and, in turn, does not aim to supersede the SA Report.
- 1.1.9 This report is structured as follows:
- **Section 2** – presents a summary of the proposed main modifications.
  - **Section 3** – considers the question of reasonable alternatives.
  - **Section 4** – presents an appraisal of the proposed main modifications.

## 2 The proposed main modifications

- 2.1.1 There are a total of 64 proposed MMs, but it is important for SA to only focus on those with the potential to generate “significance effects”, either alone or in combination (also in combination with wider aspects of the submitted local plan). Within the SA Report this translated into a strong focus on the ‘spatial strategy’, i.e. the suite of proposed site allocations (also a ‘larger villages allowance’).
- 2.1.2 Given this context, it might be suggested that the scope of MMs that need be a focus of SA is very limited, because the MMs have limited if any implications for the spatial strategy (as discussed below), and it might even be suggested that MMs-focused SA work is not needed. However, regardless of considerations around significant effects, this report is an opportunity to focus attention on, and explore issues and impacts around, those MMs that stand-out as *more significant*.

2.1.3 The majority of MMs are discussed as part of the appraisal below, but not all. There is no need to list MMs not appraised but, by way of an example, MM35 amends Core Policy 51 criterion iii) as follows: *“iii. at Stansted Airport and Chesterford Research Park: ancillary ~~business~~ hotel and conference facilities.”*

2.1.4 By way of introduction to MMs with greatest potential to generate significant effects, the following bullet points aim to present a summary of matters covered by the Inspector’s post hearings note (July 2025):

- Five year housing land supply – it may be that the Council does not have a five year housing land supply at the point of plan adoption and the Inspectors’ note explains: *“The Planning Practice Guidance advises that, wherever possible, Inspectors should recommend main modifications to the plan to ensure that it identifies a five-year housing land supply from its date of adoption. Many of the representations made on this issue support that approach by suggesting that further housing allocations be included in the Plan to address the land supply shortfall... There is however a downside to such an approach... That process would introduce considerable delay in progressing the Plan towards adoption and the delivery of the sizeable housing and other allocations contained in it. In our view, the advantages of expediting the adoption of the Plan outweigh the disadvantages of it not being able to demonstrate a five-year housing supply at this time.”* The decision is essentially *not* to modify the plan and, as such, it is difficult to suggest that this decision gives rise to significant effects. It can be noted that where there is a lack of a five year housing land supply the presumption in favour of sustainable development applies, which has been an issue locally over recent years. However, and as explained in the Inspectors’ note, it is anticipated that there will not be a lack of a five year housing land supply for long and, in any case, it is not possible to appraise the practical effects of the lack of a five year housing land supply because it cannot be anticipated what site or sites will come forward under the presumption.
- Early review policy – linked to the above, the Inspectors explain: *“... clearly there is a need for the Council to address the five-year housing land shortfall as soon as possible. Therefore, we consider it necessary to include a policy requiring an early review of the Plan unless, within a period of six months from the date of adoption, it can be demonstrated that such a housing land supply has been achieved.”* This main modification is obviously a ‘positive’ from a housing perspective, and it is also a positive from a perspective of ensuring that the district avoids the presumption in favour of sustainable development (i.e. the district benefits from plan-led growth), but it is not possible to reach meaningful conclusions on wider significant effects because the outcomes of any future review cannot be foreseen.
- Saffron Walden southern link road – the Inspectors explain: *“Core Policy 8 seeks to safeguard land south of Saffron Walden for a future section of link road between Thaxted Road and Newport Road. However, the road is not required to deliver any of the strategic site allocations included in the Plan at Saffron Walden. Neither is there any evidence that the land in question is under threat of development for other purposes. Furthermore, no transport modelling has been undertaken to demonstrate what effect such a link road would have on the wider highway network, nor how it would be funded. Given this combination of factors we conclude that there is no justification for safeguarding the land in the Plan. The Council should therefore delete Core Policy 8...”* This is again not a change that can be meaningfully appraised in terms of significant effects because: A) safeguarding land by its very nature has limited practical (‘on the ground’) implications; and B) on the basis of the Inspectors’ analysis there is little potential to reach evidenced conclusions on possible disbenefits of not safeguarding the land. The SA Report (2024) discusses the importance of giving long-term strategic consideration to growth at Saffron Walden, but there is clear case for retaining the safeguarded land for a southern link road on this basis.
- London Stansted Airport (Countryside Protection Zone) – the Inspectors’ note lists a number of relatively minor proposed modifications dealing with airport-related policies before focusing on the matter of the Countryside Protection Zone (CPZ) and, more specifically, the question of whether ponds to the south of the airport should be within the CPZ (as per the submission plan) or alternatively removed from the CPZ on the basis that they form part of the operational area of the airport. The Inspectors favour the latter approach, and it is difficult to envisage drawbacks to the proposed change.
- Secondary school safeguarding – Core Policy 18 proposes to safeguard an area of land adjacent to Forest Hall Secondary School to prevent other development precluding the potential for its future expansion. However, the Inspectors conclude: *“We have considered the advantages of safeguarding to retain the potential for expansion beyond the Plan period. However, since the land remains in the Green Belt it is already subject to a presumption against inappropriate development. Recent changes to national Green Belt policy allowing the development of grey belt land in certain circumstances does not in our view outweigh the soundness issues we have identified. Consequently, we conclude that a main modification is needed to delete policy CP18...”* Again, it is difficult to meaningfully appraise the implications of deleting a safeguarding policy.

- Thaxted – the Inspectors explain: *“There is a mix of constraints on development at Thaxted but from what was discussed at the hearing it is apparent that the principal constraint is the lack of primary school capacity at this Local Rural Centre rather than heritage and airport noise-related constraints. For clarity the Council should therefore modify supporting text paragraphs 8.8, 8.9 and 8.12 to more clearly articulate the position on constraints and development potential at Thaxted.”* This is again not a change that can be meaningfully appraised as there are no practical implications to explore.
- Building Regulation M4(3) optional technical standard for wheelchair user dwellings – the Inspectors explain: *“The evidence presented to us (HOU1) supports the provision on major residential schemes of 5% of market homes and 10% of affordable homes achieving Building Regulation M4(3) optional technical standard for wheelchair user dwellings... The standard in Core Policy 53 requires twice that level of provision... [which] is not justified by evidence, and it is unfair to expect development yet to be permitted to make up for current deficiencies in provision. The cost of meeting the M4(3) standard is significant, and even with the policy acknowledging that viability may be a reason for not meeting the requirement, it would introduce differing costs for developments without good reason to do so.”* This is a policy choice that warrants appraisal, but there is clearly limited evidenced case for retaining the more stringent policy requirement as set out in the submission plan.

- 2.1.5 The above summary of the Inspectors post hearings note serves to highlight the challenge of identifying main modifications with the potential to generate significant effects that such that they warrant appraisal. The appraisal presented in Section 4 should be read in this context.

## 3 Reasonable alternatives

- 3.1.1 In light of the discussion above – which aims to present an overview of the proposed MMs with the potential to give rise to ‘significant effects’ (alone or in-combination) – there is a need to make a decision regarding whether or not there is a need to formally define and appraise reasonable alternatives (RAs).
- 3.1.2 By way of context, the SA Report (2024) focused attention on RA ‘growth scenarios’, essentially in the form of alternative key diagrams. This was with a view to focusing attention on RAs likely to generate meaningfully different significant effects or, in short, RAs that go to the heart of the Local Plan.
- 3.1.3 In turn, the question is whether there are any RA ‘growth scenarios’ at the current time, in light of latest evidence and understanding, including understanding generated through the EiP to date.
- 3.1.4 However, on the basis of the Inspectors’ post hearings note, as summarised above, it is clear that there are not. Attention focuses on the possibility of higher growth scenarios that involve additional supply with a view to ensuring a five year housing land supply at the point of plan adoption; however, the Inspectors do not support this approach for the reasons set out above in Section 2. Also, it should be noted that the Inspectors’ post hearing note states: *“it is very possible that the Council will be able to show a five-year housing supply on or shortly after the anticipated date for adoption.”*
- 3.1.5 Beyond the possibility of RA ‘growth scenarios’ there is feasibly the possibility of exploring (i.e. defining, appraising and consulting upon) RAs for one or more ‘other’ issues that are a focus of the current main modifications consultation. However, on the basis of the discussion in Section 2 it is apparent that there are no stand-out issues at the current time where there are alternatives to explore that are reasonable in that the appraisal would be able to reach meaningful conclusions on differential significant effects.
- 3.1.6 In conclusion, there are currently no reasonable alternatives.

## 4 Appraisal of proposed Main Mods

### 4.1 Introduction

- 4.1.1 The primary aim of this section is to present an appraisal of the proposed MMs, as introduced above, under the SA Framework (see Section 3 of the SA Report), at the core of which is a list of 13 topics.
- 4.1.2 The aim is not to discuss every MM systematically under each element of the SA framework, but rather to present a targeted discussion guided by the discussion in Section 2.
- 4.1.3 A secondary aim is then to consider the 'cumulative' effect of the proposed MMs in combination with those aspects of the Submission Plan not proposed to be modified and, in doing so, update the conclusions on the Submission Plan reached within the SA Report (2023).

### 4.2 Accessibility (to community infrastructure)

- 4.2.1 By way of context, the SA Report (2024) concluded as follows:

*"There is strong support for the proposed growth strategy, given a clear focus on directing growth broadly in line with the settlement hierarchy and in response to community infrastructure issues and opportunities, most notably by supporting delivery of new schools, including to address existing issues. However, there remain some outstanding issues, namely: A) an element of residual risk in respect of secondary school capacity at Saffron Walden; and B) unresolved primary school issues at Thaxted and Great Chesterford (which can be revisited through a Local Plan Review). Also, there is a degree of uncertainty regarding primary school capacity at Newport ahead of a Draft Neighbourhood Plan, but latest understanding is that the school can expand to accommodate the 300 home housing requirement, and the Neighbourhood Plan represents an opportunity to explore options with a view to maximising benefits to the village.*

*With regards to DM policy, a key question is whether their combined effect will impact development viability to the extent that there is a need to compromise on community infrastructure objectives. There is no reason to suggest that this will be the case, in light of the Viability Study (2024) and consultation / discussions with site promoters, but the Viability Study explains that viability is tighter at Great Dunmow and Takeley than is the case for other proposed growth locations. Overall, it is now possible to predict a more positive conclusion than was the case at the Draft Plan stage (2023), given how the plan has been iterated via consultation, engagement with key partners and detailed technical work.*

*Overall, it is now appropriate to predict a **significant positive effect** on the baseline (which is a situation whereby housing growth continues without a plan, with suboptimal community infrastructure outcomes)."*

- 4.2.2 In this light, attention focuses on MMs relating to:

- School capacity – directing growth in line with school capacity issues and opportunities has been a key focus of plan-making, including recognising that issues have arisen as a result of growth under the presumption in favour of sustainable development (in the absence of an up-to-date Local Plan).

The primary modification of note is **MM14** which deals with deleting the proposal to safeguard land for a secondary school expansion at Stansted Mountfitchet, as introduced in Section 2. The Inspectors' reasoning cannot be questioned, including around the lack of clear evidence regarding need for a school expansion here. Also, the local plan serves to highlight the potential to proactively bring forward new schools capacity by working proactively with landowners as part of a spatial strategy / site selection process. However, on the other hand, there remains a high level argument for taking a precautionary approach aimed at minimising the risk of future secondary school capacity issues.

The other relevant modification relates to clarifying that primary school capacity is the primary constraint to growth at Thaxted (**MM15**). This has already been introduced above in Section 2 as a relatively minor matter, but it is of note because consideration of growth-related issues and opportunity at Thaxted was an important part of the plan-making / SA process prior to submission, including work to explore reasonable alternative growth scenarios (see Sections 5, 6 and 7 of the SA Report). The clarification is broadly supported from an 'accessibility' perspective because it should help to focus minds on options for resolving the primary school capacity issue at Thaxted, and it is difficult to suggest that the effect of the clarification is to generate any significant tensions with wider sustainability objectives.



- Plan viability – as discussed within the appraisal conclusion in 2024 (as quoted above), an important focus of the plan-making / SA process prior to submission was around exploring development viability. Specifically, there is a need to balance, on the one hand, a desire to secure new infrastructure (including community infrastructure), deliver affordable housing and deliver on wider policy objectives such as around net zero development with, on the other hand, a need to ensure that the combined effect is not to render developments unviable such that delivery issues are faced (potentially leading to a risk of the district facing the presumption in favour of sustainable development). One MM of note for having positive viability implications is **MM37**, which has already been discussed above and involves reducing the requirements placed on developers in respect of delivering wheelchair accessible housing.
- 4.2.3 A number of wider MMs have limited positive implications for accessibility objectives, and it is not possible to identify any with significant or notable drawbacks. Final MMs of note are:
- **MM7** – deals with deleting safeguarded land for a southern link road at Saffron Walden; however, and as discussed in Section 2, there is no potential to draw strong conclusions. The need to take a long-term strategic approach to growth at Saffron Walden was highlighted through the plan-making / SA process over the course of the plan-making process, and secondary school capacity is part of this, but this does not give rise to a clear argument for safeguarding land for a southern link road.
  - **MM8** – makes minor amendments to the framework plan for growth northeast of Great Dunmow.
  - **MM11** – adds reference in Policy CL13 to “*safeguarding land... for a shared use cycle/ walking facility, and routes between Takeley to London Stansted Airport.*”
  - **MM58** – confirms what is required by the proposed 110 home allocation at Elsenham in terms of new schools infrastructure. Specifically, the modification confirms the requirement as: “expansion of safeguarded site to the south of the allocation to 2.1 ha in total to facilitate construction of a new primary school with co-located early years and childcare provision.”
- 4.2.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. However, the proposal to delete the safeguarded land for secondary school expansion at Stansted Mountfitchet is of note.

## 4.3 Biodiversity

- 4.3.1 By way of context, the SA Report (2024) concluded as follows:

*“There is a strong focus on avoiding biodiversity constraints and realising opportunities, particularly through new strategic green and blue infrastructure (see the Countryside and SANGs study, 2024), although there is a need for further scrutiny of the proposed employment allocation at Takeley Street, and broadly a need for ongoing scrutiny of the potential in-combination impacts of growth along the A120 corridor, particularly given Hatfield Forest and High Wood SSSIs. Also, there is strong support for the detailed work that has been undertaken to evidence that a 20% BNG requirement is both viable and deliverable (without undue administrative burden). There is a case for now predicting ‘significant’ positive effects, recognising that the baseline situation is one whereby development continues to come forward but in a relatively unplanned way. Also, detailed Habitats Regulations Assessment (HRA) has now been completed and concluded no adverse effects to internationally important sites. However, there is a high bar to reach before ‘significant’ positive effects can be predicted with confidence (particularly ahead of the forthcoming Essex Local Nature Recovery Strategy, LNRS), and one other consideration is a degree of ongoing uncertainty around water quality (discussed below). In conclusion, a **moderate or uncertain positive effect** is predicted.”*

- 4.3.2 Given this context, none of the proposed modifications have significant implications for the achievement of biodiversity objectives. However, **MM29** is of note for dealing with biodiversity net gain (BNG), which is a key issue for the local plan, as discussed above. The key point to note from MM29 is new wording confirming that 20% BNG is required “*unless it can be clearly demonstrated that provision in excess of the statutory minimum 10% would make development unviable.*”
- 4.3.3 Final MMs of note are:
- **MM27** – summarises the policy requirements placed on developments in respect of ‘Essex Coast Recreational Disturbance Mitigation’ and ‘Hatfield Forest Protection’. It is understood that these are points of clarification as opposed to new policy requirements that are being introduced.

- **MM28** – adds the following new requirement within Core Policy 39 (Green and Blue Infrastructure): *“Where appropriate a Landscape and Ecological Management Plan (LEMP) must be prepared detailing the management and maintenance of green infrastructure assets... for the lifetime of the development.”*
- **MM47** – adds the following new requirement which applies to all proposed allocations: *“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.”*
- **MM50** – deals with the required buffer between development at Chesterford Research Park and an ancient woodland (Emmanuel Wood), with the new requirement for an “at least 15m” buffer.
- **MM57** – deals with the required Suitable Alternative Natural Greenspace (SANG) at the 270 home proposed allocation north of Stansted Mountfitchet. The policy was already to deliver a SANG, but new proposed wording specifies in more detail what is required. This is a positive from a biodiversity perspective and also in wider terms as it provides the site promoter with an opportunity to highlight any concerns through consultation, e.g. concerns around implications for site viability / deliverability.

4.3.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. A number of MMs have minor positive implications and there are unlikely to be any significant negative implications in terms of additional costs or administrative burden on developers. However, it could be appropriate to confirm that the studies required as part of planning applications are set out as clearly as possible.

## 4.4 Climate change adaptation

4.4.1 By way of context, the SA Report (2024) concluded as follows:

*“In conclusion, a **neutral effect** is predicted, as per 2023. Whilst the appraisal of RA growth scenarios concludes a slight concern with the growth strategy in terms of surface water flood risk, this conclusion is quite marginal, and concerns are allayed once detailed account is taken of proposed concept masterplans and DM policy. Having said this, proposed concept masterplans at Saffron Walden, Great Dunmow and Stansted Mountfitchet warrant ongoing scrutiny from a flood risk perspective (with a focus both on avoiding any increased flood risk and realising any opportunities for strategic flood water attenuation).”*

4.4.2 Given this context, none of the proposed modifications have significant implications for the achievement of climate change adaptation objectives. However, the following are of note:

- **MM25** – clarifies requirements in respect of avoiding and mitigation flood risk, including by adding that *“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.”*
- **MM53** – deals with growth northeast of Great Dunmow and requires that *“development is located outside of Flood Zones 2 or 3, including climate change allowance and supported by a site-specific FRA.”*

4.4.3 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

## 4.5 Climate change mitigation

4.5.1 By way of context, the SA Report (2024) concluded as follows:

*“The conclusion is as per the ISA Report (2023): “... a **neutral effect** is predicted on the baseline, accounting for established objectives, in particular... achieving net zero by 2030. As discussed, there is very strong support for the proposed development management policy framework; however, this will require further scrutiny... and there is also a need to recognise that the national policy context – in respect of requiring net zero development (onsite as far as possible) – is potentially subject to change. In turn, it is important to ensure that there is not undue reliance placed on development management policy, and that ‘no regrets’ actions are taken through spatial strategy and site selection, ensuring that growth is focused in such a way as to maximise the potential for built environment decarbonisation.”*

- 4.5.2 In this context, two key points to note are: A) there are no significant adjustments to the spatial strategy / site selection at the current time; and B) nor are there any significant proposed adjustments to the development management policy framework which, in short, is one whereby there is a requirement for net zero developments with 'net zero' calculated using a methodology given strong backing within the SA Report (and broadly with strong backing amongst specialists nationally). In respect of (B), it can also be noted that there has been clarity provided nationally regarding the potential to set net zero policy using the methodology in question (known as "energy-based") over recent months.
- 4.5.3 As discussed, none of the proposed modifications have any significant implications for climate change mitigation objectives. However, the following are of note:
- **MM19** – adjusts Core Policy 22 (Net Zero Operational Carbon Development) as follows: *"all new bungalows must achieve a space heating demand of less than 20 kWh/m<sup>2</sup> GIA/yr or less"*.
  - **MM20** – the following requirement is added to Core Policy 27 (Assessing the Impact of Development on Transport Infrastructure): *"The Quantification Statement should demonstrate how proposed sustainable transport measures and interventions will reduce carbon emissions to the greatest possible extent."*
- 4.5.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

## 4.6 Communities, equality, inclusion and health

- 4.6.1 By way of context, the SA Report (2024) concluded as follows:

*"Whilst the equivalent appraisal in 2023 predicted a neutral effect, it is now considered appropriate to predict a **moderate or uncertain positive effect**, given how the plan has been adjusted to respond to communities issues raised through the consultation, including via the completion of detailed technical work such as the CPZ Study (2024). In 2023 there was a degree of uncertainty regarding how local communities would respond to a plan focused on urban extensions, given the context of the previous withdrawn Local Plan having focused on new settlements, and a particular concern was raised regarding Great Dunmow; however, these concerns are now reduced. As part of this, the importance of needing to 'get a plan in place' in order to put an end to problematic piecemeal growth and avoid the risk of Government intervention (which would reduce the influence of communities on plan-making) has clarified. However, there is a new concern raised at the current time in respect of low growth at Thaxted."*

- 4.6.2 There are no headline considerations here, but the following MMs are of note:

- **MM4, MM6 and MM13** – amend maps to ensure that site allocation boundaries are shown in full including areas proposed for green infrastructure.
- **MM12** – adds a new policy on Takeley Mobile Homes Park.
- **MM16** – clarifies housing requirement figures for neighbourhood plans accounting for latest monitoring data on completions and commitments (updated to April 2025).
- **MM33** – deals with Core Policy 48 New Employment Development on Unallocated Sites and specifically removes reference to supporting new employment sites at larger villages *"where there are exceptional circumstances"*. This is not likely to have any significant bearing because the policy sets out criteria to guide consideration of any development proposals, including with reference to the receiving settlement.
- **MM34** – adds flexibility regarding the requirement for large scale planning applications to include a site-specific Employment and Skills Plan (ESP).
- **MM36** deals with Core Policy 52a (Good Design Outcomes and Process for Strategic Allocations) and adds a new requirement for strategic allocations made through the local plan to: *"take a comprehensive and co-ordinated approach to development including respecting existing site constraints..."*
- **MM37** – involves reducing the requirements on developers in respect of delivering wheelchair accessible housing. It has already been discussed above as having positive implications for development viability but arguably has negative implications for health and equality objectives. This is not clear cut though, because the new requirement is understood to be in line with the available evidence.

Furthermore, MM37 also deals with housing mix, and the new proposal is that housing mix should be defined "having regard to" the latest Local Housing Need Assessment (LHNA).

- **MM44** – deals with Health Impact Assessments (HIAs) and notably extends the requirement to submit an HIA to *all* residential development proposals. The following are also notable requirements:
  - “the scope of the Health Impact Assessment is agreed with the Council’s Development Management and Public Health team’s prior to commencement of the assessment at the earliest opportunity”
  - “the assessment is undertaken at an early stage of the development process and there is a clear demonstration that the assessment process has informed the overall design process”
- **MM32** – deals with noise pollution, including by specifying that: “Outdoor noise on school sites should not exceed 55DB LAEQ (30 MIN).”
- **MM63** – relates to amending the Countryside Protection Zone (CPZ), as introduced in Section 2. Whilst it is acknowledged that the CPZ is a valued designation amongst local residents, it is difficult to envisage any negative implications arising from the proposed amendments.

4.6.3 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. Several of the MMs have notable positive implications for communities (etc) objectives, but there are some minor tensions generated by a small number of MMs, most notably MM37 on wheelchair accessible housing.

## 4.7 Economy and employment

4.7.1 By way of context, the SA Report (2024) concluded as follows:

*“Whilst the Draft Local Plan predicted a moderate or uncertain positive effect, it is now possible to predict a **significant positive effect**. The ISA Report (2023) flagged some concerns, but these are now allayed in light of consultation responses and ongoing engagement with key partners. There is particular support for: A) supporting new R+D space at Great Chesterford Research Park; and B) supporting new industrial and logistics space along the A120 corridor. However, respect of (A) there is a need for an ongoing focus on supporting nearby housing growth; and in respect of (B) there is a need to ensure a long term strategy in-line with environmental and transport objectives. Also, there is a need for ongoing monitoring of the situation in respect of needs locally for office space, including to support a diverse local employment offer.”*

4.7.2 In this context, a proposed modification of note is **MM62**, which proposes to clarify the safeguarding for A120 access to/from the Taylors Farm employment allocation. As the MM deals with a safeguarding area it is difficult to suggest any significant implications.

4.7.3 Otherwise, there are numerous MMs that involve adjustments aimed at ensuring a policy framework that reflects the operational requirements of London Stansted Airport, namely **MM10**, **MM22**, **MM23**, **MM26**, **MM28**, **MM29** and **MM60**. The combined effect is positive for the airport and, in turn, the economy.

4.7.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

## 4.8 Historic environment

4.8.1 By way of context, the SA Report (2024) concluded as follows:

*“The appraisal in 2023 flagged a ‘moderate or uncertain negative effect’, recognising constraints to growth at key settlements and proposed allocations and given the context that: “It is important to recognise that the proposed strategy is very different to that which underpinned the previously withdrawn local plan, namely a strategy centred on delivering three large new garden communities (which generated significant objection from a historic environment perspective).” However, the appraisal in 2023 also recognised that: “The historic environment has fed-in to the spatial strategy / site selection process as a key issue (e.g. influencing the proposed approach of nil proposed new supply at Great Chesterford)”.. The plan now performs notably better in many respects, both on account of adjustments made to strategy (notably at Thaxted and Newport) and masterplanning (notably at Takeley). However, there are still some tensions with historic environment objectives, most notably at Great Dunmow / Church End / Parsonage Down. On balance it remains appropriate to continue to flag a **moderate or uncertain negative effect**, although this is marginal, i.e. there is an argument for concluding an overall neutral effect, including given that alternative options are limited and the baseline situation involves continued growth without a plan.”*

- 4.8.2 There are a number of MMs that seek to clarify development management policy, which are all broadly supported from a historic environment perspective and not considered to have any drawbacks of note:
- **MM41** – is amended such that a heritage statement is required as part of all applications which affect or have the potential to affect a heritage asset (not only designated assets).
  - **MM42** – amends the policy dealing with scheduled monuments.
  - **MM43** – proposes a new policy dealing with registered parks and gardens, for example requiring: “*Where new landscaping is proposed as mitigation against the impact of development on a Registered Park and Garden, this should be reflective of the pattern and identity of the existing landscaping within the asset.*”
- 4.8.3 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

## 4.9 Homes

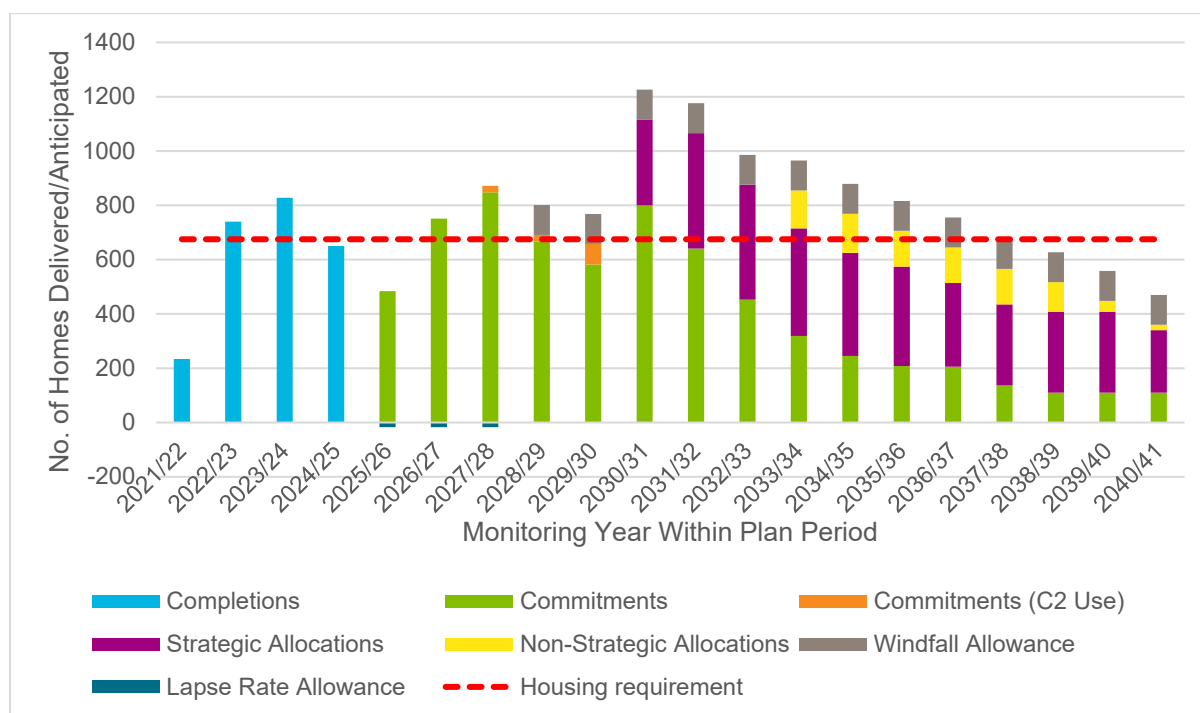
- 4.9.1 By way of context, the SA Report (2024) concluded as follows:

*“The conclusion from the ISA Report (2023) still broadly holds true, namely that: “... a **moderate or uncertain positive effect** is predicted on the baseline, accounting for established objectives. The plan represents a considerable step-change, in terms of addressing housing and wider accommodation needs locally, in the context of a national housing crisis, but there is a need for further work, including around deliverability and providing for Gypsy and Traveller accommodation needs.” In terms of growth quantum (i.e. setting the housing requirement relative to need, and then identifying a supply of sites/land sufficient to provide for the housing requirement on an annual basis, recognising that under-delivery can lead to punitive measures) the plan performs as well or better than in 2023, recognising that there has been a significant ‘boost’ to supply from sites unexpectedly gaining planning permission (that will deliver in the crucial early part of the plan period). In terms of growth distribution, the new proposed approach at Thaxted (no housing growth bar windfall) is not ideal, but the matter can be revisited through a Local Plan Review; and development viability along the A120 corridor that could feasibly lead to challenges in respect of delivering affordable housing in line with policy (in terms of the total number of affordable homes and their tenure mix). Finally, in respect of providing for Gypsy and Traveller accommodation needs, work has been completed but the available evidence base is incomplete, with the main outstanding issue uncertainty regarding needs beyond year five of the plan period.”*

- 4.9.2 There are two matters to discuss here.
- 4.9.3 Firstly, and as discussed, the decision has been made not to boost supply through main modifications but rather to introduce a new policy (**MM3**) requiring an early plan review should it be the case that the district is not able to demonstrate a five year housing land supply six months after the point of plan adoption. Responding to the issue in this way is considered to be suitably proactive from a housing perspective, including recognising that (as stated in the Inspectors post hearings letter): “*it is very possible that the Council will be able to show a five-year housing supply on or shortly after the anticipated date for adoption.*” As can be seen from the latest housing trajectory below (Figure 4.1), new supply identified through the local plan is expected to boost supply significantly from 2030/31, such that maintaining a five year housing land supply over the early years of the plan period should not be an issue.
- 4.9.4 Secondly, MM40 deals with providing for Gypsy and Traveller accommodation needs and explains that a new study has been published that identifies a need figure considerably higher than that which informed finalisation the local plan in 2024. New text through the MM explains that the plan as published/submitted sought to provide for needs – as understood at that time – through expansion of existing sites (as opposed to through new sites), but that the additional need highlighted through the more recent study will be provided for through “*a separate Gypsy and Traveller Development Plan Document that will allocate new Gypsy and Traveller sites sufficient to meet the residual identified need at new sites.*” Text within the MM also explains that Council “*intend a draft of this document to be published for Regulation 18 consultation in 2025*” and it will be important to ensure that delays do not occur, as is all too often the case.
- 4.9.5 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. The proposed mechanisms for ensuring sufficient supply of both housing and Gypsy and Traveller pitches are supported including recognising that the effect should be to expediate delivery of the identified Local Plan supply.



Figure 4.1: The housing trajectory with completions and commitments updated to April 2025



## 4.10 Land, soils, resources

### 4.10.1 By way of context, the SA Report (2024) concluded as follows:

*“The conclusion from the ISA Report (2023) still holds true, namely that: “... it is appropriate to flag a **moderate or uncertain negative effect** given the extent of high quality agricultural land that would be lost. However, it is difficult to envisage an alternative strategy that would be preferable, and there is no clear guidance in respect of judging the significance of loss of agricultural land through local plans. The available guidance focuses on planning applications.”*

### 4.10.2 This conclusion broadly still holds true for the Submission Local Plan plus MMs, and it is very difficult to suggest that the proposed MMs give rise to any implications of note. Moving forward it will be important to ensure clarity regarding how / the extent to which grade 1 agricultural land feeds into spatial strategy and site selection (also work to decide a new housing requirement, if and when the Council prepares a new Local Plan).

### 4.10.3 The proposed modifications do not have any significant implications for discussion, other than to briefly note that three MMs (**MM52**, **MM54**, **MM59**) require planning applicants for specific sites to submit a Minerals Resource Assessment and/or a Waste Infrastructure Assessment.

### 4.10.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

## 4.11 Landscape

### 4.11.1 By way of context, the SA Report (2024) concluded as follows:

*“The ISA Report (2023) concluded that: “... after having accounted for the proposed suite of development management policies and also the site specific policies that have been developed (which will be further refined and supplemented prior to plan finalisation), it is appropriate to predict a broadly neutral effect on the baseline. However, the fact remains there are clear sensitivities. It will be important that plan-finalisation is informed by consultation responses received and further work, e.g. in respect of development densities, scheme layouts and integration of green infrastructure. There will be a need to consider the combination effects of developments and also ensure a suitably long-term perspective, including along the A120/B1256.”*

*The plan has been improved significantly since the Draft Plan stage, perhaps most notably at Takeley (also accounting for the latest proposals in respect of CPZ designation). However, there remain sensitivities and challenges that will require ongoing consideration (as part of plan finalisation over the course of the Examination in Public, and then through decision making at the development management stage). As such, it remains appropriate to predict a **neutral effect**.*

- 4.11.2 Again it is the case that there is a degree of tension on account of the proposal to boost the housing requirement without identifying specific new supply, but it is not possible to conclude a significant concern. Within the southern plan area a key issue is maintaining settlement gaps / distinct settlement character, and in the northern plan area there are also sensitivities given a characteristic rural landscape.
- 4.11.3 There are no headline considerations here, but the following MMs are of note:
- **MM30** – adds reference to the need to account for the “setting” of valued landscape character areas.
  - **MM56** – deals with the proposed allocation north of Stansted Mountfitchet and in respect of Pennington Lane at the western edge of the site adds: *“There should be no new vehicular access to the land from the development.”* This was a matter previously explored through the SA process (specifically work to define reasonable alternative growth scenarios).
- 4.11.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. Two proposed modifications give rise to minor positive effects and cannot be said to have any notable drawbacks.

## 4.12 Transport

- 4.12.1 By way of context, the SA Report (2024) concluded as follows:

*“The proposed growth strategy performs very well in a number of respects, in light of a range of technical studies and consultation on a full draft version of the Local Plan in 2023 (a very important step in terms of providing partner organisations with early certainty and an opportunity to input effectively to plan-making). Fundamental aspects include: provision for housing need in full, which is important from a transport perspective; directing growth in line with the settlement hierarchy and restricting growth in rural areas (including Thaxted); directing growth to settlements with a train station (albeit the plan might ideally have a stronger focus in this regard, including noting the new lower growth strategy for Newport); and directing growth to the A120 corridor where, despite inherent constraints (given background traffic growth outside the control of the Local Plan), there is also a strategic opportunity (albeit more so at Takeley than at Great Dunmow). Also, it is important to recall that the current Local Plan is a major departure from the previous withdrawn local plan, which sought to rely on costly and uncertain major new transport infrastructure. Overall, and after taken account of concept masterplans and DM policies, it is now possible to predict **moderate or uncertain positive effects**, although there does remain a need for ongoing scrutiny of the viability, deliverability and efficacy of the sustainable transport proposals that are so central to the proposed approach to mitigating growth in road transport, perhaps most notably at Great Dunmow.”*

- 4.12.2 There are no headline considerations here, but the following MMs are of note:
- **MM7** – deals with deleting safeguarded land for a southern link road at Saffron Walden and has been discussed above. There is no clear and evidenced need for the road in transport terms.
  - **MM11** – adds reference in Policy CL13 to *“safeguarding land... for a shared use cycle/ walking facility, and routes between Takeley to London Stansted Airport.”*
  - **MM21** – significantly expands Core Policy 31 (Parking Standards) with a focus on cycle parking including by stating that *“secure and covered cycle parking should be prioritised over private car parking.”*
  - **MM48** – deals with site allocation 2a and adds that: *“The development South of Thaxted Road should deliver a Spine Road to the same specification with an onward connection Safeguarded in the South-West of the site in the approximate location indicated on the framework plan.”*
  - **MM51** – deals with site allocation 3a and adds that: *“Contributions/ improvements to the Flitch Way may be required.”*
  - **MM62** – proposes to clarify the safeguarding for A120 access to/from the Taylors Farm employment allocation. As the MM deals with a safeguarding area it is difficult to suggest any significant implications.

- 4.12.3 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. A number of proposed modifications are strongly supported in transport terms, and it seems unlikely that any will significantly impact development viability or otherwise generate notable drawbacks in terms of wider objectives.

## 4.13 Water

- 4.13.1 By way of context, the SA Report (2023) concluded as follows:

*“Whilst the proposed ambitious approach to water efficiency is supported, in the context of a water-stressed sub-region, there are some outstanding wastewater treatment challenges along the A120 corridor. There will likely be a solution, but it is appropriate to flag a **moderate or uncertain negative effect** at this stage.”*

- 4.13.2 There is only one proposed modification of note, namely **MM24** which involves some very minor adjustments to the wording of Core Policy 34 (Water Supply and Protection of Water Resources).
- 4.13.3 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

## 4.14 Overall conclusion

- 4.14.1 The appraisal finds that none of the proposed modifications generate significant effects, either alone or in combination, nor do any of the proposed modifications generate a need to amend the appraisal conclusions previously reached on the Local Plan as a whole within the SA Report (2024).
- 4.14.2 However, a number of proposed modifications are flagged through the appraisal as being of note, including MMs dealing with: removing safeguarded land for a secondary school at Stansted Mountfitchet; reducing the requirements on developers in respect of wheelchair accessible housing; and committing to a separate Gypsy and Traveller Development Plan Document to meet recently identified accommodation needs.
- 4.14.3 A final consideration is whether there is a need to amend any of the appraisal conclusions reached on the Local Plan in 2024 (within the SA Report) to reflect updated evidence, including evidence from Regulation 19 representations and contributions to the Local Plan’s examination in public. In this regard it is fair to say that there is now a case for ‘boosting’ the appraisal conclusion previously reached under three sustainability headings – climate change adaptation (flood risk), the historic environment and water – but in other respects it remains appropriate to retain the appraisal conclusions from 2024. There do naturally remain some uncertainties regarding plan implementation – for example in respect of delivering on infrastructure, affordable housing and wider policy objectives (notably net zero development) within the parameters of development viability – hence careful monitoring of plan implementation will be called for.