

**Urban Place Supplement 14.12.2006
Public Consultation
Regulation 18**



Consultation replies have been considered by a UPS Assessment Board comprising representatives of Essex County Council and each of the Essex District and Borough Councils intending to adopt the UPS. The assessment board meetings took place over four sessions in November and December 2006.

**Direct Reference:
General Comment**

Contact Name: Hamish McIlwrick	Organisation: Hadstock Parish Council	Reference: 115
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Summary of comments	Response to comments	Summary of proposed action
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We are concerned that adoption of this SPD could accelerate urbanisation in rural communities by imposing urban design regimes. The UPS gives no definition of urban areas in relation to compact development. The UPS should be limited to 'named' urban areas of Uttlesford.

It is not the intention that the Urban Place Supplement is applied to rural areas, only locations as highlighted on pages 5-13, principles embodied in the Essex Design Guide will continue to be applied to rural areas where the UPS is not applicable.

Make further reference and add note to the Scope p5 to confirm this point. Also add text to Diagram 3.

**Direct Reference:
General Comment**

Contact Name: Nicola L	Organisation: Strutt	Reference: 116
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Bickerstaff	and Parker	
Summary of comments	Response to comments	Summary of proposed action
<p>It is important to encourage development on the rural fringes, this will maintain the viability of rural services and prevent over cramming and over development in urban areas.</p>	<p>The UPS is not about allocating land use. It is about creating sustainable communities in sustainable locations. The UPS to be applied to urban areas and is not concerned with how settlements grow. LDF and local plan policies will deal with these issues.</p>	<p>Make further reference and add note to the Scope p5 to confirm this point. Also add text to Diagram 3.</p>
<p>Contact Name: Neil Blackshaw</p>	<p>Organisation: Dunmow Town Design Statement Group</p>	<p>Reference: 117</p>
Summary of comments	Response to comments	Summary of proposed action
<p>If adopted as SPD we would like the following conditions attached: In all circumstances the special character of the Districts market towns and villages will be an overriding consideration when applying the UPS and in considering the type of development to be approved in future.</p>	<p>The context appraisal methodology would prevent inappropriate development. Design and assessment statements are a requirement anyway. These would be useful in assisting with the context appraisal process.</p>	<p>Add an extra paragraph and illustration under the Scope section P5 to further clarify the scope of the document</p>

The application of the UPS in market towns is subject to the production by any applicant of an expert design and character statement.

That comprehensive design and character statements for the market towns of the District be produced or up dated by the Council as a matter of urgency.

**Direct Reference:
General Comment**

Contact Name: John P. Murphy

**Organisation:
Dunmow Strategy Group**

Reference: 118

Summary of comments

Response to comments

Summary of proposed action

The recommended densities stated in the UPS would mean four storey buildings and higher being the norm. The UPS has little relevance to market towns (although mentioned in the document) and implementation of small infill development would irrevocably damage their character. For these reasons we oppose any proposal to

The UPS is not about allocating land use. It is about creating sustainable communities in sustainable locations. The UPS to be applied to urban areas and is not concerned with how settlements grow. LDF and local plan policies will deal with these issues.

Make further reference and add note to the Scope p5 to confirm this point. Also add text to Diagram 3 to clear up misunderstanding.

adopt the UPS in its current form into the UDC LDF.

Building height will be determined by the context appraisal. No direct relationship between height and density. UPS mentions that 'small infill' needs to mesh and blend into existing context.

**Direct Reference:
General Comment**

Contact Name: Cllr John Murphy

Organisation:
Uttlesford District
Council Member for
Great Dunmow (North)

Reference: 119

Summary of comments

The Urban Places Supplement was designed, as I understand it, for predominantly urban areas of the county such as Basildon, Chelmsford and Colchester, where there is already intensive development. This is clearly opposite to market towns.

Response to comments

It applies to all urban areas, urban centres, neighbourhoods, regeneration areas etc.) The UPS is not about allocating land use. It is about creating sustainable communities in sustainable locations. The UPS to be applied to urban areas and is not concerned with how settlements grow. LDF and local plan policies will deal with these issues.

Summary of proposed action

Make further reference and add note to the Scope p5 to confirm this point. Also add text to Diagram 3 to clear up misunderstanding.

Contact Name: P. Hughes	Organisation: Silver End Parish Council	Reference: 125
Summary of comments As Silver End is a village, not an Urban Centre, we would not be likely to be directly affected by this Supplement. However, the Supplement does seem to have some good points. The emphasis on high standards of Sustainability, and good design specific to each site, to integrate the location, layout, and transport to reduce car movements, will reduce traffic congestion and pollution. The emphasis on eco design will reduce energy demand as well as water demand, and the integration of water management and rain run off will reduce flooding and add potential features to sites. The supplement does fill the gap between the Essex Design Guide, and High Density small infill sites,	Response to comments Silver End is probably outside the scope of the UPS, but this would be up to BDC to decide. Adoption of the UPS would bring sustainability requirements to bear upon new developments. The UPS is not about allocating land use. It is about creating sustainable communities in sustainable locations. The UPS to be applied to urban areas and is not concerned with how settlements grow. LDF and local plan policies will deal with these issues.	Summary of proposed action Make further reference and add note to the Scope p5 to confirm this point. Also add text to Diagram 3 to clear up misunderstanding.

and the larger edge of Urban Sites.

My opinion is that SEPC should support the introduction of the Urban Place Supplement.

Contact Name: Peter F. Askew (Chairman)

Organisation: Retirement Housing Group

Reference: 126

Summary of comments

Response to comments

Summary of proposed action

The role and status of the document within the planning system introduced by the Planning and Compulsory Purchase Act 2004 is unclear. The UPS proposes fundamental change to planning policies, not the amplification or expansion of existing plan policies. Our understanding, however, is that SPDs must build upon, and be related to, policies set out in the new-style development plan documents (DPDs) and that major new policies, such as that set out in the UPS should not be brought in through SPD.

GO-East has made a related representation to which a full response has been written (see Appendix A)

Action will be governed by GO-East's further response.

Direct Reference:		
General Comment		
Contact Name: Peter F. Askew (Chairman)	Organisation: Retirement Housing Group	Reference: 126
Summary of comments	Response to comments	Summary of proposed action
Local planning authorities can only adopt documents as Supplementary Planning Documents if they are listed in the Local Development Schemes required under the new planning framework or, if they are to be attached to old-style saved Local Plans, they must fully accord with specific policies in the Plans to which they relate before they can be adopted.	GO-East has made a related representation to which a full response has been written (see Appendix A)	Each adopting District and Borough will highlight the specific policies that related to each section of the guidance in accordance with their LDF. An introduction paragraph will be added to explain how the document will be applied to each district.
Direct Reference:		
General Comment		
Contact Name: Victoria Bullock	Organisation: Barton Willmore- on behalf of Crest Nicholson (Eastern) Ltd	Reference: 127
Summary of comments	Response to comments	Summary of proposed action
Having regard to the Planning and Compulsory Purchase Act 2004 (PCPA	GO-East has made a related representation	Amend text where it appears prescriptive throughout the document. Action will be governed by GO-East's further response.

2004) we object to Braintree District Council seeking to adopt a document prepared by the County Council as a SPD. We highlight Section 16 of PCPA 2004 restricts the planning policy making role of County Councils to the preparation of Minerals and Waste Developments Frameworks only.

to which a full response has been written (see Appendix A)

**Direct Reference:
General Comment**

Contact Name: Victoria Bullock

Organisation: Barton Willmore- on behalf of Crest Nicholson (Eastern) Ltd

Reference: 127

Summary of comments

It is also of our opinion that the adoption of the document would fail to satisfy the provisions of PPS12 Local Development Frameworks as set out in paragraph 4.24 and also raises policy issues that should first be tested through independent scrutiny in accordance with statutory procedures. (paragraph 2.44 of PPS12) relating to SPD.

Response to comments

GO-East has made a related representation to which a full response has been written (see Appendix A)

Summary of proposed action

Action will be governed by GO-East's further response.

Direct Reference:
General Comment

Contact Name: Victoria Bullock

Organisation: Barton Willmore- on behalf of Crest Nicholson (Eastern) Ltd

Reference: 127

Summary of comments

It is our client's position that the District [Braintree] should not adopt the UPS. Should BDC adopt the UPS, it is our position that little if any weight should be attached to its provisions in the determination of planning applications.

Response to comments

GO-East has made a related representation to which a full response has been written (see Appendix A)

Summary of proposed action

Action will be governed by GO-East's further response

Direct Reference:
General Comment

Contact Name: Gabrielle Rowan

Organisation: Pegasus Planning Group on behalf of Persimmon Homes (Essex) Ltd, Martin Grant Homes and George Wimpey

Reference: 132

Summary of comments

There are some concerns in relation to the proposed status of the document and how it will relate to the

Response to comments

It is not the intention that the Urban Place Supplement is applied

Summary of proposed action

Make further reference and add note to the Scope p5 to confirm this point. Also add text to Diagram 3.

current Essex Design Guide. The supplement will not replace the Essex Design Guide once adopted and that document will remain the principle planning guidance for the design of new development in Essex. There may be some confusion in relation to different approaches used in the different documents.

to lower density areas, only locations as highlighted on pages 5-13, the principles embodied in the Essex Design Guide will continue to be applied to rural areas where the UPS is not applicable.

Direct Reference:
General Comment

Contact Name: Alan Stones

Organisation: Alan Stones

Reference: 137

Summary of comments

Response to comments

Summary of proposed action

P8, 9 should come after p19

Noted

The document will be reordered to make it easier to read and use. Illustrations will be reworked and be reproduced in colour.

Illustrations e.g. pp.44+45 look lifeless and mechanical

Noted

See above

Titling of illustrations looks heavy, use lighter type

Noted

Amend under-croft parking text to include or clarify this point.

Too prevent developers from using too much under croft parking, there should be a stipulation: "no more than 10% of street frontage

The text on p47 mentions max requirements for under croft parking.

All scenarios illustrations will be amended and axonometrics will be added to the final version. Index to be added

occupied by undercroft parking”

Noted

Scenarios need sections and axons so reader understands how they work, an index is needed!

Direct Reference:
General Comment

Contact Name: P Cronk

Organisation: HBF

Reference: 139

Summary of comments

Response to comments

Summary of proposed action

An LDF that refers to the UPS may be defined as unsound because it is not based on sound data or research that has been shared with stakeholders or appropriately scrutinized

GO-East has made a related representation to which a full response has been written (see Appendix A)

Action will be governed by GO-East’s further response.

Direct Reference:
General Comment

Contact Name: P Cronk

Organisation: HBF

Reference: 139

Summary of comments

Response to comments

Summary of proposed action

The UPS seeks to amend local plan policies rather than supplement them, contrary to planning legislation It introduces requirements without policy justification

GO-East has made a related representation to which a full response has been written (see Appendix A)

Action will be governed by GO-East’s further response.

Direct Reference:
General Comment

Contact Name: L Smith-

Organisation:

Reference: 139a

Evans	Colchester Borough Council	
Summary of comments	Response to comments	Summary of proposed action
UPS needs to define Morphology	It is agreed that this is unnecessary use of jargon	Replaced the word morphology on page 108 with 'analysis of town growth'.
Direct Reference: General Comment		
Contact Name: Mel Dunbar	Organisation: Melville Dunbar Associates representing Crest Nicholson, George Wimpey, Persimmon Homes, Redrow, Taywood Homes	Reference: 143
Summary of comments	Response to comments	Summary of proposed action
The UPS is extremely prescriptive for a document intended to be supplementary planning guidance.	It is accepted that the draft UPS is inappropriately prescriptive in place.	Amend text where it appears prescriptive throughout document
Direct Reference: General Comment		
Contact Name: Mel Dunbar	Organisation: Melville Dunbar Associates representing Crest Nicholson, George Wimpey, Persimmon Homes, Redrow, Taywood Homes	Reference: 143

Summary of Comments	Response to comments	Summary of proposed action
<p>It appears that the correct procedures have not been followed: details of SPD needs to have been included in a Local Development Scheme which many of the authorities intending to adopt the document have failed to do and it does not satisfy regulations that require SPD policies to be cross-referenced to the relevant development plan document and set out which policy it supplements.</p>	<p>GO-East has made a related representation to which a full response has been written (see Appendix A)</p>	<p>Action will be governed by GO-East's further response.</p>
<p>Direct Reference: General Comment</p>		
<p>Contact Name: Mette McLarney</p>	<p>Organisation: Countryside Properties</p>	<p>Reference: 144</p>
Summary of comments	Response to comments	Summary of proposed action
<p>Status of the document is unclear. It appears to be a guide yet suggests mandatory requirements. PPS1 states that design policies should avoid unnecessary prescription.</p>	<p>Agreed. It is accepted that the draft UPS is inappropriately prescriptive in places. GO-East has made a related representation to which a full response</p>	<p>Amend text where it appears prescriptive throughout the document.</p> <p>Action will be governed by GO-East's further response.</p>

has been written (see Appendix A)

**Direct Reference:
General Comment**

**Contact Name: Mette
McLarney**

**Organisation:
Countryside
Properties**

Reference: 144

Summary of comments

There is no mention of Design and Access Statements which are now a requirement of the planning application process.

**Response to
comments**

This omission is recognised

Summary of proposed action

Add reference to Design and Access statements p8-9.

**Direct Reference:
General Comment**

**Contact Name: Mette
McLarney**

**Organisation:
Countryside
Properties**

Reference: 144

Summary of comments

The UPS is too lengthy and does not differentiate between what is advisory or mandatory:

**Response to
comments**

Prescriptive text and terminology to be amended throughout the document. Document length is a by-product of the complexity and scope.

Summary of proposed action

Amend text where it appears prescriptive throughout the document. Use EDI website for referencing to reduce document size.

**Direct Reference:
General Comment**

Contact Name: Melanie

Organisation:

Reference: 148

Jones	Uttlesford District Council	
Summary of comments	Response to comments	Summary of proposed action
The advice in the document is welcomed but there is concern that developers could view the document as encouraging high density development which would be inappropriate in market town centres. It is felt that it should be clearly stated in the UPS how it should be applied in smaller market towns.	It is not the intention of the UPS to encourage density that is inappropriate to local context.	Make further reference and add note to the Scope p5 to confirm this point. Also add text to Diagram 3 to clear up misunderstanding.
Direct Reference: General Comment		
Contact Name: Mary Power	Organisation: Savills on behalf of Martin Dawn PLC	Reference: 151
Summary of comments	Response to comments	Summary of proposed action
The number of requirements being expected from large developments may mean that development may not happen at all – a degree of flexibility should be built in to ensure that a new development is not unduly burdened by the under-	Any increased costs related to the UPS will result in increased value as well as additional benefits in terms of economic, environmental and social sustainability. The UPS is planning	Make further reference and add note to the Scope p5 to confirm this point. Also add text to Diagram 3 to clear up misunderstanding.

investment of previous developments in respect of sustainable development initiatives.	guidance and each development proposal will be judged in relation to site specific considerations. It is accepted that in some cases under-investment shortfalls could not met entirely by new development and each case will be judged on its merits in negotiating with local planning authorities. The Context Appraisal provides the platform for this process.
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**Direct Reference:
General Comment**

Contact Name: Mary Power

Organisation: Savills on behalf of Martin Dawn PLC

Reference: 151

Summary of comments

The document is an unnecessary additional layer of policy requirements in the context of

- the need for Design and Access Statements
- each district council is

Response to comments

Design and Access statements will be referenced and how they will sit with the Context Appraisal.

The UPS will supplement districts core strategies.

Summary of proposed action

Add reference to Design and Access statements p8-9.

Clarify Green Points system requirements and scope in the UPS.

<p>introducing policies which have sustainable development measures to promote sustainable patterns of development.</p> <ul style="list-style-type: none"> • large scale development may be required to prepare EIA which may address any of the points raised in the UPS • the Eco Homes Checklist ratings is a more appropriate measure than the Green Points Table 	<p>EIA requirements will be able to be produced with the information gathered in the Context Appraisal methodology saving unnecessary duplication of work.</p> <p>The Green Points System is only a guide that encourages biodiversity into development plans from the outset.</p>
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Direct Reference:

General Comment

Contact Name: Nick Vass-Bowen	Organisation: Development Plans Team GO-East	Reference: 153
Summary of comments	Response to comments	Summary of proposed action
<p>Some UPS requirements appear to be outside the scope of planning or outside the scope of other regulatory mechanisms for</p>	<p>GO-East has made a related representation to which a full response has been written (see</p>	<p>Action will be governed by GO-East's further response.</p>

instance p49 waste recycling and facilities, p.59 Lifetime Homes standard, p73 EcoHomes/BREEAM ratings, p74 solar control glass and selection of internal equipment, p78 rainwater harvesting and performance of water appliances. These issues should not be covered in a prescriptive manner

Appendix A)

**Direct Reference:
General Comment**

**Contact Name: Nick
Vass-Bowen**

**Organisation:
Development Plans
Team GO-East**

Reference: 153

Summary of comments

**Response to
comments**

Summary of proposed action

There are a number of places where the UPS appears to place requirements in a prescriptive way but it is highly likely that there will not be a policy basis for these requirements in Development Plans Policies. The final SPD should clarify that these are aspirations for Essex that in many or most cases will need to be brought

Agreed. It is accepted that the draft UPS is inappropriately prescriptive in places.

GO-East has made a related representation to which a full response has been written (see Appendix A)

Amend text where it appears prescriptive throughout the document.

Action will be governed by GO-East's further response.

forward through DPDs

Direct Reference:
General Comment

Contact Name: Nick
Vass-Bowen

Organisation:
Development Plans
Team GO-East

Reference: 153

Summary of comments

The inflexible application of standards is likely to inhibit design that is responsive to the local context and will result in a lack of innovation in design through inhibiting the ability to respond to particular issues (such as car parking or outside space) on a site by site basis.

Response to comments

It is accepted that the draft UPS is inappropriately prescriptive in places. The Context Appraisal enables factors affecting the to be assessed on a site-by-site basis

GO-East has made a related representation to which a full response has been written (see Appendix A)

Summary of proposed action

Amend text where it appears prescriptive throughout the document.

Action will be governed by GO-East's further response.

Direct Reference:
General Comment

Contact Name: Nick
Vass-Bowen

Organisation:
Development Plans
Team GO-East

Reference: 153

Summary of comments

The inflexible approach may fail to take account of site specific considerations

Response to comments

It is accepted that the draft UPS is

Summary of proposed action

Amend text where it appears prescriptive throughout the document.

<p>such as soil conditions or contamination which may hinder projects or render them unviable in relation to the prescribed design response.</p>	<p>inappropriately prescriptive in places. The Context Appraisal enables factors affecting the viability of development to be assessed on a site-by-site basis</p> <p>GO-East has made a related representation to which a full response has been written (see Appendix A)</p>	<p>Action will be governed by GO-East's further response.</p>
<p>Direct Reference: General Comment</p>		
<p>Contact Name: Nick Vass-Bowen</p>	<p>Organisation: Development Plans Team GO-East</p>	<p>Reference: 153</p>
<p>Summary of comments</p> <p>SPDs are required to be founded upon a robust and credible evidence base and are appropriate, having considered relevant alternatives. There is no apparent evidence and testing of relevant options: eg derivation of the 0.1ha threshold for Context Appraisal. In the absence of an evidence base there is a risk that the weight that can be accorded to the</p>	<p>Response to comments</p> <p>GO-East has made a related representation to which a full response has been written (see Appendix A)</p>	<p>Summary of proposed action</p> <p>Action will be governed by GO-East's further response.</p>

SPD may be reduced

Direct Reference:
General Comment

Contact Name: Gabrielle Rowan

Organisation:
Pegasus Planning Group on behalf of Martin Grant Homes, Persimmon Homes (Essex) & George Wimpey

Reference: 132

Summary of comments

The document should not be too prescriptive nor inconsistent with LDF policies e.g. car parking levels or requirements

Response to comments

It is accepted that the draft UPS is inappropriately prescriptive in places. Each district will set out the implications of the UPS and the relevant policies that relate to the document will be highlighted.

Summary of proposed action

Amend text where it appears prescriptive throughout the document.

Direct Reference:
General Comment

Contact Name: Gabrielle Rowan

Organisation:
Pegasus Planning Group on behalf of Martin Grant Homes, Persimmon Homes (Essex) & George Wimpey

Reference: 132

Summary of comments

Response to

Summary of proposed action

<p>There appears to be elements in the UPS outside the scope of planning and other regulations with no justification how the document can request measures which exceed these standards. Exceptions should be encouraged rather than required.</p>	<p>comments</p> <p>It is accepted that the draft UPS is inappropriately prescriptive or outside the scope of planning issues in places.</p> <p>The UPS is a guide that will work alongside the Essex Design Guide. The document is not intended to be prescriptive.</p>	<p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: General Comment</p>		
<p>Contact Name: Maitland Hyslop</p>	<p>Organisation: Maitland Hyslop on behalf of Mr R Barber, Mrs S P Barber, Mrs J P Cowell and Mrs S A Mee.</p>	<p>Reference: 160</p>
<p>Summary of comments</p> <p>The UPS states that it avoids a prescriptive menu but appears to be prescriptive, with no reasoning provided</p>	<p>Response to comments</p> <p>It is accepted that the draft UPS is inappropriately prescriptive in places. GO-East has made a related representation to which a full response has been written (see</p>	<p>Summary of proposed action</p> <p>Amend text where it appears prescriptive throughout the document.</p> <p>Action will be governed by GO-East's further response.</p>

Appendix A)

Direct Reference:
General Comment

Contact Name: Stuart
Rickards

Organisation:
Environment Agency

Reference: 161

Summary of comments

**Response to
comments**

Summary of proposed action

Local planning authorities may have other policies/SPD that cover sustainability issues and the link to these and the UPS should be made clear so that the policies from each source mutually support one another and developers are aware of all the requirements.

It is agreed that the relationship between the UPS and existing policies needs to be made clearer. The linkages between the UPS and existing policies will differ between different authorities and it would be inappropriate to cover these in the UPS itself.

Local planning authorities adopting the UPS will clarify the relationship between existing policies and the provisions of the UPS.

Action will be governed by GO-East's further response.

GO-East has made a related representation to which a full response has been written (see Appendix A)

Direct Reference:
General Comment

Contact Name: Stuart
Rickards

Organisation:
Environment Agency

Reference: 161

Summary of comments

**Response to
comments**

Summary of proposed action

There is no direct consideration of flood risk.

It is accepted that this

Additional text

It is recommended that the constraints that may be placed on developments in areas at a high risk of flooding are reflected by the document or clear links made to national and other local guidance documents. There will be a requirement for site-specific Flood Risk Assessments in flood risk zones.

point needs to be covered and additional text will be agreed to meet the concerns of the Environment Agency

**Direct Reference:
General Comment**

Contact Name: Sophie O'Hara Smith

Organisation: Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson

Reference: 162

Summary of comments

There seems to be some ambiguity about whether the full content of the document will be considered as adopted supplementary planning guidance. This would need to be clarified before it came into use.

Response to comments

Each district will be responsible for setting out which parts of the UPS can be adopted on the basis of existing policies. The document is retained as a whole as it is recognised that there are elements of inter-dependence between the objectives

Summary of proposed action

Local planning authorities adopting the UPS will clarify the relationship between existing policies and the provisions of the UPS.

of the UPS. It is important to regard the guidance as a complete work rather than seeing it as presenting a menu of possibilities from which elements are chosen.

It is agreed that the relationship between existing policies needs to be made clearer. The linkages between the UPS and existing policies will differ between different authorities and it would be inappropriate to cover these in the UPS itself.

Action will be governed by GO-East's further response.

GO-East has made a related representation to which a full response has been written (see Appendix A)

Direct Reference:
General Comment

Contact Name: Sophie O'Hara Smith

Organisation: Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson

Reference: 162

Summary of comments

The status of the proposed Context Appraisal and its relationship with Design and Access Statements is unclear. Also the proposed 'sign-off' would pre-empt statutory consultation. The new process could add to delays in bringing forward of development

Response to comments

It is accepted that there is a need to clarify the status of Context Appraisals. It has been made clear that whilst Appraisals are strongly encouraged, completion of an Appraisal would not be a pre-requisite of a planning application. The omission of reference to Design and Access statements is recognised. The Context Appraisal requirements set out in the draft UPS are not intended to pre-empt the proper considerations of policy issues and it is recognised that the normal statutory consultation processes will be followed when any subsequent planning application is submitted. The effect hoped for is that such Appraisals, carried out properly, would actually assist rather than place limitations on the overall

Summary of proposed action

Add reference to Design and Access statements p8-9.
Text revised to clarify the status of Context Appraisals and their 'signing-off'

consultation process.
No evidence exists to suggest that design guidance adversely impacts upon delivery. In some circumstances, it is possible that it actually assists by removing uncertainty.

**Direct Reference:
General Comment**

Contact Name: Sophie O'Hara Smith

Organisation: Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson

Reference: 162

Summary of comments

The document is over prescriptive and could be open to misinterpretation. It is unclear about what is mandatory and what is desirable.

The approach adopted by Chelmsford Borough Council (CBC), in its guidance on Urban Site Design, concentrates on design rather than combining design with policy guidance, and is far

Response to comments

Each district will be responsible for setting out which parts of the UPS can be adopted on the basis of existing policies. It is agreed that the relationship between existing policies needs to be made clearer. The linkages between the UPS and existing policies will differ between different

Summary of proposed action

Amend text where it appears prescriptive throughout the document. Local planning authorities adopting the UPS will clarify the relationship between existing policies and the provisions of the UPS.

less prescriptive. It promotes a design led approach based on the nature of a site, its context and urban design objectives rather than by technical standards, set practices or the need to achieve a pre-determined quantum of development. In other words, whilst denser development is promoted for the most accessible locations, each site will be taken on its merits based on the context analysis. We feel that this more flexible approach, that has clear aspirations and requires detailed analysis of context but allows for a range of design responses, should be taken by the Urban Place Supplement.

authorities and it would be inappropriate to cover these in the UPS itself.

It is accepted that the draft UPS is inappropriately prescriptive in place.

Direct Reference:
General Comment

Contact Name: Lee Melin

Organisation:
Bidwells on behalf of
Barratt Eastern
Counties

Reference: 163

Summary of comments

**Response to
comments**

Summary of proposed action

As currently drafted, the

Action will be governed by GO-East's further response.

UPS does not accord with adopted/saved policies in the local plans/LDSs of the local planning authorities intending to adopt the UPS as a Supplementary Planning Document and as such is procedurally flawed, SPDs are non-statutory documents that do not form part of the development plan and it would clearly be nonsense for key design policy to be addressed in this way.

GO-East has made a related representation to which a full response has been written (see Appendix A)

**Direct Reference: Page 5
– Scope**

Contact Name: Gabrielle Rowan

Organisation: Pegasus Planning Group on behalf of Persimmon Homes (Essex) Ltd, Martin Grant Homes and George Wimpey

Reference: 132

Summary of comments

It is understood that each local authority will adopt the Urban Place Supplement as a Supplementary Planning Document. However, there are concerns that correct procedures should be

Response to comments

GO-East has made a related representation to which a full response has been written (see Appendix A)

Summary of proposed action

Action will be governed by GO-East's further response.

followed in terms of listing this document in their adopted Local Development Schemes.

**Direct Reference: Page 5
- scope**

**Contact Name: P Cronk
Summary of comments**

**Organisation: HBF
Response to comments**

**Reference: 110
Summary of proposed action**

It is stated that: *'...In practice, this supplement will be applicable to the majority of residential and mixed use developments within urban areas as it produces additional guidance on most potential development scenarios ranging from the largest urban extensions to the development of small, infill plots...'*

The text later states that *'...It is therefore important to regard the guidance as a complete work rather than 'cherry pick' individual components which may be difficult to apply in isolation...'*

It is then says that *'...Not all of the provisions are*

Each district will be responsible for setting out which parts of the UPS can be adopted on the basis of existing policies. The document is retained as a whole as it is recognised that there are elements of inter-dependence between the objectives of the UPS. It is important to regard the guidance as a complete work rather than seeing it as presenting a menu of possibilities from which elements are chosen. It is agreed that the relationship between existing policies needs to be made clearer. The linkages between the

Local planning authorities adopting the UPS will clarify the relationship between existing policies and the provisions of the UPS.

Action will be governed by GO-East's further response.

able to be adopted as supplementary planning guidance at this point in time...'. The HBF considers that the document is somewhat unclear as to what precise parts of its content are (capable of) being adopted as supplementary guidance.

UPS and existing policies will differ between different authorities and it would be inappropriate to cover these in the UPS itself.

GO-East has made a related representation to which a full response has been written (see Appendix A)

Direct Reference: Page 5 - Scope

Contact Name: D Lander Organisation: Boyer Planning Reference: 129

Summary of comments

Scope if the document unclear. Is it guidance or is it prescriptive?

There is overlap with development plans and national policy

Response to comments

It is agreed that the relationship between existing policies needs to be made clearer. The linkages between the UPS and existing policies will differ between different authorities and it would be inappropriate to cover these in the UPS itself. The UPS is a guide that will work alongside the Essex

Summary of proposed action

Amend text where it appears prescriptive throughout the document. Local planning authorities adopting the UPS will clarify the relationship between existing policies and the provisions of the UPS.

Design Guide. The document is not intended to be prescriptive.

Direct Reference: Page 6
– How to use this document

Contact Name: P Cronk
Summary of comments

Organisation: HBF
Response to comments

Reference: 110
Summary of proposed action

The HBF queries under what legal powers can the local planning authority require the signing off of a context appraisal by it, and other interested parties, before the submission of a planning application?

It is accepted that there is a need to clarify the status of Context Appraisals. It has been made clear that whilst Appraisals are strongly encouraged, completion of an Appraisal would not be a pre-requisite of a planning application and any 'signing-off' would be advisory only. The Context Appraisal requirements set out in the draft UPS are not intended to pre-empt the proper considerations of policy issues and it is recognised that the normal statutory consultation processes

Amend text to 'signing off process' to make clear the process.

will be followed when any subsequent planning application is submitted. The effect hoped for is that such Appraisals, carried out properly, would actually assist rather than place limitations on the overall consultation process.

Direct Reference: Page 6
– How to use this document

Contact Name: D Lander

Organisation: Boyer Planning

Reference: 129

Summary of comments

Response to comments

Summary of proposed action

Context appraisal cannot be “signed off” before submission of planning application

It is accepted that there is a need to clarify the status of Context Appraisals. It has been made clear that whilst Appraisals are strongly encouraged, completion of an Appraisal would not be a pre-requisite of a planning application. The Context Appraisal requirements set out in the draft UPS are not intended to pre-empt the proper

Amend text to ‘signing off process’ to make clear the process.

Context appraisal generally too onerous process

considerations of policy issues and it is recognised that the normal statutory consultation processes will be followed when any subsequent planning application is submitted. The effect hoped for is that such Appraisals, carried out properly, would actually assist rather than place limitations on the overall consultation process.

The context appraisal is a greater detailed version of the Design and Access statement that is a required submission.

Direct Reference: Page 6
– How to use this document

Contact Name: Mel Dunbar

Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey, Persimmon Homes, Redrow Homes, Taywood Homes

Reference: 143

Summary of comments

Response to

Summary of proposed action

<p>The second line (p6) says the UPS avoids a prescriptive menu but it is over prescriptive throughout (e.g. the rules it established for determining density)</p>	<p>comments</p> <p>It is accepted that the draft UPS is inappropriately over-prescriptive in places. The UPS is a guide that will work alongside the Essex Design Guide.</p>	<p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: Page 6 – How to use this document</p>		
<p>Contact Name: Mel Dunbar</p>	<p>Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey, Persimmon Homes, Redrow Homes, Taywood Homes</p>	<p>Reference: 143</p>
<p>Summary of comments</p> <p>Much of the work required by the UPS would be covered by the required Design & Access Statements which the UPS ignores.</p>	<p>Response to comments</p> <p>Design and Access statements will be referenced as part of the final version of the UPS. Text will be added making clear the role of the context appraisal and Design and Access statements, ruling out any duplication issues and enhancing the benefits of applying</p>	<p>Summary of proposed action</p> <p>Add additional paragraph to p8 referencing Design and Access statements.</p>

context to any development proposals.

Direct Reference: Page 6
– How to use this document

Contact Name: Nick Vass-Bowen

Organisation: Development Plans Team GO-East

Reference: 153

Summary of comments

Response to comments

Summary of proposed action

The 'signing off' of a Context Appraisal is not something that can be required and it could potentially delay schemes. Failure to 'sign off' within an agreed timescale could not be an impediment to an application being submitted.

It is accepted that there is a need to clarify the status of Context Appraisals. It has been made clear that whilst Appraisals are strongly encouraged, completion of an Appraisal would not be a pre-requisite of a planning application. The Context Appraisal requirements set out in the draft UPS are not intended to pre-empt the proper considerations of policy issues and it is recognised that the normal statutory consultation processes will be followed when any subsequent planning application is

Amend text to 'signing off process' to make clear the process.

Action will be governed by GO-East's further response.

submitted. The effect hoped for is that such Appraisals, carried out properly, would actually assist rather than place limitations on the overall consultation process.

GO-East has made a related representation to which a full response has been written (see Appendix A)

**Direct Reference: p6
diagram 1**

**Contact Name: Emma
Butler**

**Organisation: ECC
Transportation and
strategic development**

Reference: 158

Summary of comments

**Response to
comments**

Summary of proposed action

Box 4 should say “Consult Local Planning Authority, Highway Authority and Stakeholders”
Box 6 should say “Concept agreed with Local Planning Authority, Highway Authority and others as necessary.”

Accept comments

Change text as proposed to both amends to boxes 4 and 6.

**Direct Reference: Page 7
– Urban Context**

Contact Name: P Cronk

Organisation: HBF

Reference: 110

Summary of comments

Response to comments

Summary of proposed action

No justification is given in policy terms for the threshold of 0.1 hectares, above which context appraisals will be required. This size threshold seems too low and will obviously affect a very high number of development sites.

0.1 ha is a significant site within an urban context.. The UPS, however, is not intended to be a prescriptive document and the need for a context appraisal could be re-assessed in appropriate circumstances.

Amend text where it appears prescriptive throughout the document.

**Direct Reference: Page 7
– Diagram 2**

Contact Name: D Lander

**Organisation: Boyer
Planning**

Reference: 129

Summary of comments

No justification of the 0.1 ha threshold for context appraisals

**Response to
comments**

0.1 ha is a significant site within an urban context. The UPS, however, is not a prescriptive document and the expectation that a context appraisal should be produced could be lowered in appropriate circumstances.

Summary of proposed action

Amend text where it appears prescriptive throughout the document.

**Direct Reference: Page 7
– Urban Context**

Contact Name: John

Organisation: Essex

Reference: 149

Hammond	County Council Senior Policy Planner	
Summary of comments	Response to comments	Summary of proposed action
‘What facilities for access to bus services are needed?’ should be added to the list of questions to be asked	An additional diagram will be added to the document to address this issue.	Add an addition diagram 2 highlighting the issues relating to accessing bus services.
Direct Reference: Page 7 – Urban Context		
Contact Name: Nick Vass-Bowen	Organisation: Development Plans Team GO-East	Reference: 153
Summary of comments	Response to comments	Summary of proposed action
The UPS makes no reference to Design and Access Statement with which the Context Appraisal will overlap. The relationship between the two documents needs clarifying.	Design and Access statements will be referenced as part of the final version of the UPS. Text will be added making clear the role of the context appraisal and Design and Access statements, ruling out any duplication issues and enhancing the benefits of applying context to any development proposals.	Add additional paragraph to p8 referencing Design and Access statements.
Direct Reference: p7 diagram 2		

Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action
Some questions to be asked? What facilities for access to bus services are needed?	Accept	Change as proposed: add suggested amends to p7 diagram 2
Direct Reference: Page 8 – Context Appraisal Methodology		
Contact Name: Karen Syrett	Organisation: Colchester Borough Council	Reference: 142
Summary of comments	Response to comments	Summary of proposed action
Some of the arboricultural advice contained in the UPS is contrary to the best practice approach developed within the Council's Development Control section. Detailed amendments to the document will be suggested in respect of this point. An 'Arboricultural Assessment' should be included within the Context Appraisal to survey and analyse existing tree/hedges cover on site at the planning application	It is accepted that there may be conflicts in advice which will be addressed on receipt of amendments to which reference is made. Agreed that an arboricultural assessment should be included in context appraisal	Amend text as necessary Amend text

stage, thereby identifying any resulting constraint imposed on development by same, this in accordance with the recommendations in BS 5837. Comments will also be made on the paving hierarchy, detailing, workmanship, trees, microclimates and accommodating the car. Full details are attached as an appendix to this report.

**Direct Reference: Page 8
– Context Appraisal
Methodology**

**Contact Name: Frances
Falconer**

**Organisation: Natural
England**

Reference: 150

Summary of comments

**Response to
comments**

Summary of proposed action

We advise that 'availability of opportunities for integration of biodiversity enhancements and accessible multifunctional greenspace' should be considered within the Functional Context (step 3). Within the first bullet point we suggest use of comma "diversification, location and arrangement".

Agreed

Amend text

**Direct Reference: p11
existing neighbourhoods**

**Contact Name: Emma
Butler**

**Organisation: ECC
Transportation and
strategic development**

Reference: 158

Summary of comments

“Bus route including 400m bus stops” – this needs clarifying, does this mean spacing of bus stops or walking distance from a bus stop, it should be walking distance.

**Response to
comments**

The text is relating to walking distances to bus stops.

Summary of proposed action

Change as proposed and clarify.

**Direct Reference: Page
12 – Spatial Context**

Contact Name: D Lander

**Organisation: Boyer
Planning**

Reference: 129

Summary of comments	Response to comments	Summary of proposed action
<p>Size of large urban infill determined at min of 50 ha, is this a typo? There is a large gap between Small Urban Infill (0.1 ha) and Large Urban Infill (at least 50 ha)</p>	<p>This is not a typing error – everything else is either a Town Centre, a Neighbourhood, a Regeneration Area or a Sustainable Urban Extension spatial development type as set out in pp10-11. There is scope however for the document to be clearer.</p>	<p>To be made clearer by revising diagram 3 on page 12</p>
<p>Direct Reference: Page 13 – Establishing the Development Type</p>		
<p>Contact Name: John P. Murphy</p>	<p>Organisation: Dunmow Strategy Group</p>	<p>Reference: 118</p>

Summary of comments	Response to comments	Summary of proposed action
<p>The document aims for 75dph for town centres and a min 70dph for neighbourhoods and 65dph for sustainable urban extensions. This means high rise buildings- forcing us to accede to 4 storey buildings in our town centre and on its approaches, changing the scale and character of our [Dunmow] market town.</p>	<p>75 dph does not mean high-rise development: that density figure being achievable with 2-3 storey development. The Small Infill scenario demonstrates this (p91). It is accepted, however, that there appears to be a need to meet these concerns expressed and to show more clearly that compact development is possible within relatively low building forms,</p>	<p>Clearer illustration of 2/3 storey development at densities over 75 dph to be provided.</p>
<p>Direct Reference: Page 13 – Establishing the Development Type</p>		
<p>Contact Name: Gabrielle Rowan</p>	<p>Organisation: Pegasus Planning Group on behalf of Persimmon Homes (Essex) Ltd, Martin Grant Homes and George Wimpey</p>	<p>Reference: 132</p>

Summary of comments

This flowchart appears to potentially miss out or mislead the designation of spatial context and development types – for instance, should a site be within 800m of an existing urban centre then it could potentially be categorised as Compact Development (regardless of whether it comprises 50ha or more of land). Similarly, if the site area is less than 50ha but more than 800m from an existing urban centre the flowchart points towards referring to the Essex Design Guide. This may lead to confusion in relation to how the two documents work together.

Response to comments

The UPS classification of development types is a 'model', but other plan policies will apply in a local situation. It is accepted that there is need to amend the text and diagram to make clearer the relationship between the UPS and the Essex Design Guide (p13)

Summary of proposed action

Text and diagram amended

Direct Reference: Page 13 – Establishing the Development Type

Contact Name: D Lander

Organisation: Boyer Planning

Reference: 129

Summary of comments	Response to comments	Summary of proposed action
Diagram too simplistic and inflexible	This is intended to provide guidance but, as a result of other comments, is being reworked to provide clearer guidance.	Diagram 3 amended
Direct Reference: Page 13 – Establishing the Development Type		
Contact Name: Karen Syrett	Organisation: Colchester Borough Council	Reference: 142
Summary of comments	Response to comments	Summary of proposed action
The UPS divides the urban areas into various categories depending upon accessibility, infrastructure and facilities available. When these areas are plotted using the stated inclusion criteria most of urban Colchester and many of the principal towns and villages fall into UPS high density categories. Therefore development pressure on currently low density areas will be significant. New development in these areas will be of a different	This is a misinterpretation of the guide; it will not apply to villages per sé or in locations outside ‘units of sustainability’ as defined in the UPS. It does not requires a blanket use of higher density but, contrary to much recent development, does expect schemes to within local context .The clarification of diagram 3 (above) will cover this.	Diagram 3 clarified

scale and character to that currently exhibited.

Direct Reference: Page 13 – Establishing the Development Type

Contact Name: Frances Falconer

Organisation: Natural England

Reference: 150

Summary of comments

Response to comments

Summary of proposed action

Consideration of some proposals will require a different approach from those listed: we advise an additional question is added to this system: 'does this development meet ANGSt targets?' If the development does not we would expect the proposal to be mapped to a type of development that is expected to make a major contribution to provision of new multifunctional greenspace to meet these targets, wherever possible.

The ANGSt (Accessible Natural Greenspace Standards) targets are advisory and it is not considered necessary to incorporate their mention in the diagram used for establishing development type. The UPS however makes reference to developments linking to green spaces and it would be appropriate to mention ANGSt targets in the Public Space section (p23)

Amend text (p23) to include ANGSt

Direct Reference: Page 13 – Establishing the Development Type

Contact Name: Nick Vass-Bowen

Organisation: Development Plans

Reference: 153

Team GO-East

Summary of comments

It is not clear whether the approach required will vary depending on whether the site is allocated or is a windfall site. It would be expected that the principle of use or mix of uses and the density will have been established principally through the spatial strategy and allocation policies in the Development Plan in the context of alternatives and options through the application of SA/SEA procedures. How would the UPS approach be applied in these circumstances?

Response to comments

The UPS would apply to allocated and windfall sites but would not override existing masterplans, design briefs etc. Each district will be responsible for setting out which parts of the UPS can be adopted on the basis of existing policies. It is agreed that the relationship between existing policies needs to be made clearer. The draft UPS is inappropriately prescriptive in places.

Summary of proposed action

Text amended

Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 13 – Establishing the development type

Contact Name: Gabrielle Rowan

Organisation: Pegasus Planning Group on behalf of Martin Grant Homes, Persimmon Homes (Essex) & George Wimpey

Reference: 132

Summary of comments	Response to comments	Summary of proposed action
Matters such as density should be established principally through the spatial strategy and allocations in individual LDFs thus allowing for their proper testing relative to the specific characteristics and needs of particular communities - which a county-wide average density requirement would not do.	The provisions of the UPS will not override any spatial strategy and allocations in individual LDFs. Each district will be responsible for setting out which parts of the UPS can be adopted on the basis of existing policies. It is agreed that the relationship between existing policies needs to be made clearer.	Text amended
Direct Reference: Page 14 – Built Form Context		
Contact Name: D Lander	Organisation: Boyer Planning	Reference: 129
Summary of comments	Response to comments	Summary of proposed action
Definition of what is meant by “unit of sustainability” needs to be provided	This is described in the text but a definition could usefully be included in the Glossary	Definition added to Glossary
Direct Reference: Page 17 – Operational and Community Context		
Contact Name: P Cronk	Organisation: HBF	Reference: 110
Summary of comments	Response to comments	Summary of proposed action
The text refers to the need		Text added to clarify this (p17)

for developers to undertake an audit of housing demand for tenure and type. The Council's own Housing Market Assessments will already contain this information.	The information referred to is not necessarily available at neighbourhood level and the requirement also applies to market housing. Information differs between different local authorities
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Direct Reference: Page 17 – Functional context

Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
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Summary of comments	Response to comments	Summary of proposed action
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We advise that “geological” is added, consistent with the requirements of PPS9 *Biodiversity and Geological Conservation*. It may be helpful to add to this section some information about what “biodiversity (and geological) structure” means in practice.

The need for geological information is likely to be included in a landscape assessment but Appendix 2 will be amended to clarify this

Addition to Appendix 2

Direct Reference: Page 18 – Copyright and Site Appraisal

Contact Name: D Lander	Organisation: Boyer Planning	Reference: 129
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Summary of comments	Response to comments	Summary of proposed action
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Context appraisal replicates design and

It is accepted that that

Add reference to Design and Access statements p8-9.

access statements the relationship
between Design and
Access Statements and
the UPS Context
Appraisals should be
set out in the text.

Direct Reference: Page
19 – Planning Obligation
Agreements

Contact Name: Wai-Kit
Cheung

Organisation:
RPS/belief of
Fairview New Homes

Reference: 136

Summary of comments	Response to comments	Summary of proposed action
<p>Use of planning contributions as set out on page 19 needs to conform with Circular 05/2005. Include the following comment:</p> <p>“The Council will have regard to the impact of planning contributions on the viability of development and will ensure that they are necessary to allow consent to be given for a particular development and that they are fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other aspects”</p>	Agreed	Text amended
<p>Direct Reference: Page 19 – Planning Obligation Agreements</p>		
<p>Contact Name: Karen Syrett</p>	<p>Organisation: Colchester Borough Council</p>	<p>Reference: 142</p>

Summary of comments	Response to comments	Summary of proposed action
<p>No Emphasis is given to Essex County services and there is no mention that priorities will be set and the contributions agreed by the local planning authority. Reference is also made to an ECC document to be launched on behalf of the Essex Planning Officers Association – these needs to be confirmed.</p>	<p>The draft text states that mitigation etc would fall outside of this initial discussion and will be determined in connection with any future planning application. The text could be clearer to reflect this. The ECC document is not being accepted by all adopting local authorities and reference to the need to refer to individual local authority policies is to be included</p>	<p>Additional text to clarify this point.</p>

Direct Reference: Page 19 – Planning Obligation Agreements

Contact Name: Mette McLarney

Organisation: Countryside Properties

Reference: 144

Summary of comments	Response to comments	Summary of proposed action
<p>The integration of design with Section 106 planning obligations is unwelcome; it is not accepted that agreeing Heads of Terms should be influenced by design guidance</p>	<p>‘Heads of Terms’ should be guided by early preliminary discussions and wide collaboration in an assessment of local needs, aspirations and potential of a locality. The ‘signing-off’ process is advisory and the Context Appraisal requirements set out in the draft UPS are not intended to pre-empt the proper considerations of planning obligations. It is recognised that the normal statutory consultation processes will be followed when any subsequent planning application is submitted. It is agreed that the relationship could be made clearer.</p>	<p>Additional text to clarify</p>
<p>Direct Reference: Page 19 - Planning Obligation Agreements</p>		
<p>Contact Name: Frances Falconer</p>	<p>Organisation: Natural England</p>	<p>Reference: 150</p>
Summary of comments	Response to comments	Summary of proposed action
<p>We consider that Planning Obligations have a very important role to play in securing the safeguarding of existing biodiversity and geological assets, mitigation of any impacts, creation of new habitats and management of existing and newly created habitats. This should be reflected in this section of the document.</p>	<p>Not all elements are necessarily determined within a s106 package. Rather, survey results should feed directly into the design process and built into the design outcome. Need to explain the role of other documents within the LDF including separate guidance on s106 payments</p>	<p>Additional text as above</p>
<p>Direct Reference: Page 20 – Influences Upon Quality and Urban Grain</p>		
<p>Contact Name: P Cronk</p>	<p>Organisation: HBF</p>	<p>Reference: 110</p>
Summary of comments	Response to comments	Summary of proposed action

“architects working alongside urban designers, landscape architects, ecologists, engineers, commercial surveyors, BREEAM assessors and the community”.

No justification for this policy, financially unfeasible

This will not be a requirement but it is becoming accepted good practice through CABE and other national guidance promoting collaborative design.

Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 22 - Movement

Contact Name: John Hammond

Organisation: Essex County Council Senior Policy Planner

Reference: 149

Summary of comments

The choice of bridge or subway depends on which would be more convenient in the circumstances. Cyclists prefer well-designed subways to bridges

Response to comments

Because of safety concerns, subways should remain a choice of last resort. The visual problems and inconvenience of bridges is recognised and the emphasis of the text could change to reflect this.

Summary of proposed action

Amend text to generally exclude bridges except at-grade bridges

Direct Reference: Page 23 – Public Space

Contact Name: P Cronk

Organisation: HBF

Reference: 110

Summary of comments

It is stated that least 50% of the ground floor frontage of development facing main streets should be allocated for non-residential uses other than vehicle parking. This is amending rather than supplementing policy, taking no account of Local Plan policies or site circumstances.

Response to comments

If the site is on a main street it is inevitable that there will be a demand for non-residential uses, which will be identified within the context appraisal.
As an adopted SPD the UPS would not take precedence over Local Plan policies and would not be prescriptive. It is accepted that the text needs clarifying to reflect this ‘Main street’ needs defining

Summary of proposed action

Text on p23 to be amended and a diagram added
Main Street added to glossary
Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 23 – Public Space

Contact Name: P Cronk

Organisation: HBF

Reference: 110

Summary of comments

Response to comments

Summary of proposed action

Requirements for communal and public open space may be contradictory to local plan requirements.

The UPS provides guidance on how to make higher density developments work well. It would be a material consideration in any planning application but would not be prescriptive nor take precedence over adopted Local Plan policies.

Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 23 – Public Space

Contact Name: D Lander

Organisation: Boyer Planning

Reference: 129

Summary of comments

Response to comments

Summary of proposed action

“50% non-residential on ground floor along major streets” is too inflexible

If the site is on a main street it is inevitable that there will be a demand for non-residential uses, which will be identified within the context appraisal.
As an adopted SPD the UPS would not take precedence over Local Plan policies and would not be prescriptive. It is accepted that the text needs clarifying to reflect this ‘Main street’ needs defining

Text on p23 to be amended and a diagram added
Main Street added to glossary
Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 23 – Public Space

Contact Name: Frances Falconer

Organisation: Natural England

Reference: 150

Summary of comments

Response to comments

Summary of proposed action

We advise that provision of multifunctional greenspace to meet both biodiversity and ANGSt targets (Accessible Natural Greenspace Standards) and/or, where this is not feasible, biodiversity conservation and enhancements integrated into the development and/or contributions to the enhancement and management of existing greenspace, should also be required for any mixed use

The targets are advisory but as the UPS makes reference to developments linking to green spaces and it would be appropriate to mention ANGSt targets in the Public Space section (p23)

Amend text (p23) to include ANGSt/website

development.

Direct Reference: Page 23 – Public Space

Contact Name: Frances Falconer

Organisation: Natural England

Reference: 150

Summary of comments

Response to comments

Summary of proposed action

Natural England takes issue with the somewhat negative feel of the wording of the paragraph “The Context Appraisal process.....surrounding facilities” and suggests some more positive re-wording. On the basis of the additional question suggested above for Section 4 having been included, then oversupply of greenspace is unlikely to occur. The positive benefits of greenspace for general health and wellbeing as well as providing for biodiversity cannot be emphasised enough, in addition to its role in adding economic value to developments.

Suggested text infers that developers can be required to contribute through s106, which they cannot.
It would be appropriate to mention ANGSt targets in the Public Space section and to refer to the appropriate website

Minor amendment to text of paragraph and amend text (p23) to include ANGSt/website

A suitably rephrased paragraph might read:-
“The Context Appraisal process makes it unnecessary to require an arbitrary amount of greenspace for every home or development providing that due consideration has been given to existing local green infrastructure and local green infrastructure plans. Where a development is considered not to require inclusion of new greenspace, developers will be expected to contribute to the management and where appropriate enhancement of existing greenspace provision. Where additional greenspace is required, any necessary provision must be multifunctional including biodiversity enhancements, and of a very high quality so as to meet the needs of the new

community. It should meet the design criteria below.” We recommend the inclusion of Natural England’s ANGSt model, perhaps as an Annex.

Direct Reference: Page 23 – Public Space

Contact Name: Frances Falconer

Organisation: Natural England

Reference: 150

Summary of comments

Response to comments

Summary of proposed action

Natural England welcomes the list of criteria for all public spaces. We advise that a bullet point stating, “appropriately managed and resourced” should be added, to maximise the likelihood of public spaces being fully functional, attractive and providing the benefits they are designed to deliver in the long term.

This point is covered in the UPS (p51)

Minor text amendment on p23 to make reference to management.

Direct Reference: Page 23 – Public Space

Contact Name: Sophie O’Hara Smith

Organisation: Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson

Reference: 162

Summary of comments

Response to comments

Summary of proposed action

The document rightly stresses that the inclusion of mixed uses should be influenced by the context appraisal process. This is at odds with the prescriptive formula for 50% of ground floor frontages on certain streets to be allocated to non-residential uses. Economics must be a key factor in defining mix of uses but the guide ignores this. There is no point planning for uses that don’t have occupiers.

It is accepted that the document is overly-prescriptive in places. Mixed-use requirements would be informed by a context appraisal which should identify these issues. If the site is on a main street it is inevitable that there will be a demand for non-residential uses, which will be identified within the context appraisal but it is accepted that ‘Main street’ needs defining

Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 23 – Public Space

Contact Name: Sophie O’Hara Smith

Organisation: Andrew Martin Associates on

Reference: 162

behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson		
Summary of comments	Response to comments	Summary of proposed action
<p>The location of mixed uses is too prescriptive: not all distributor roads will be an appropriate location. Footfall has always been an indicator of viability and the guide should take some but not total regard of the “space syntax” approach to integration in order to locate non-residential uses appropriately.</p>	<p>It is accepted that the document is overly-prescriptive in places Mixed-use requirements would be informed by a context appraisal which should identify these issues If the site is on a main street it is inevitable that there will be a demand for non-residential uses, which will be identified within the context appraisal but it is accepted that ‘Main street’ needs defining.</p>	<p>Amend text where it appears prescriptive throughout the document.</p>
Direct Reference: Page 24 – Public Space		
Contact Name: Frances Falconer		
Organisation: Natural England		
Reference: 150		
Summary of comments	Response to comments	Summary of proposed action
<p>Within the paragraph beginning “Pocket parks for instance, can be very small spaces...” the final sentence could read “Small areas of grass can be difficult to maintain, <u>but where appropriate carefully chosen and where possible native plantings should be used instead.</u>”</p> <p>Natural England would like to point out the availability of Developer Guidelines which have been produced as Volume 2 of the Harlow Green Infrastructure Plan. Similar guidelines are being produced for Thames Gateway South Essex.</p>	<p>Agreed</p>	<p>Amend text</p> <p>Website details added</p>
Direct Reference: Page 27 – Quality of Public space		

Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
Summary of comments	Response to comments	Summary of proposed action
<p>We are disappointed to see that the two examples given in Images 23 and 24 appear to show no biodiversity provision. This is a recurring problem throughout the Urban Place Supplement, which presents as aspirational examples of urban developments photographs and artist's sketches of urban spaces almost entirely devoid of habitat provision. Given the emphasis the UPS gives to biodiversity. we would like to see some of these pictures replaced with photographs of urban developments which include functional biodiversity enhancements.</p>	<p>Accept that there could be a better illustration of biodiversity in an urban development</p>	<p>Substitute image 23</p>
<hr/>		
Direct Reference: p28	Organisation: ECC Transportation and strategic development	Reference: 158
Contact Name: Emma Butler	Response to comments	Summary of proposed action
<p>1# Suggest adding a caveat to end of "Materials" paragraph which states "use of materials would need to have the approval of the Highway Authority. Commuted sums for maintenance will be sought when non-standard materials are used for highway which is to be adopted."</p> <p>2# Specifics of design detail needs agreeing with the Highway Authority. The Highway Authority should have the last word when deciding what surface materials can be used.</p>	<p>1# "The use of materials in the highway must have the approval of the Highway Authority" will be added to page 28. Commuted sum's for maintenance is a Highways policy that this document does not want to change. However we do not want to restrict the choice of using quality materials on new developments.</p> <p>2# The specifics of design detail in the Highway will need to be approved by the Highway Authority; the UPS is not changing this protocol. As above.</p>	<p>1# Change as proposed</p> <p>2# No action required</p>

<p>3# The Highway Authority needs to be a consulted and approve all matters relating to existing and proposed Highways. This needs to be made clear at the beginning of the document as well as making individual references within the document.</p>	<p>3# The suggested addition to p28 will be added.</p>	<p>3# Add text</p>
<hr/>		
<p>Direct Reference: p29 Paving Hierarchy Contact Name: Emma Butler</p>	<p>Organisation: ECC Transportation and strategic development</p>	<p>Reference: 158</p>
<p>Summary of comments</p>	<p>Response to comments</p>	<p>Summary of proposed action</p>
<p>Road type 2a Mixed Use street/Road Types 4, 5, 6, 7, and 8/Play Street Materials, Materials to be used:</p>	<p>There is scope for using bound gravel and clay especially in situations where the roads will not be adopted.</p>	<p>No amendments apart from terminology.</p>
<p>Bound gravel and clay, will not be accepted by the Highway Authority It is not appropriate to use any type of bound gravel as it is not suitable for running carriageways/footways. There is a maintenance liability/cost implication with bound gravel (e.g. tree pits). Clay is not acceptable due to its poor skid resistance.</p>	<p>Clay paving materials have not been specified for highway use, apart from parking bays and footways.</p>	<p>No action required</p>
<p>Dressed Asphalt is not the correct terminology, it is not a formal term for carriageway surfacing, what is meant by this? Should this be “Asphalt with coloured chippings”?</p>	<p>The term ‘Asphalt with coloured chippings’ is not the suggested material.</p>	<p>‘Dressed wearing course’ will be amended in place of dressed asphalt.</p>
<p>No design detail – there are no required standards to conform to. The Essex Design Standard will help with this.</p>	<p>The UPS notes that “the quality of the public realm can be seriously let down by poor attention to detail” and as such highlights the key factors and elements that need to be addressed.</p>	<p>No action required</p>

Direct Reference: p30		
Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action
Image 30b – “An alternative would be to use cast iron” – add, “where agreed as being appropriate.”	Accept alternative text: “An alternative may be to use cast iron” – add, “where agreed as being appropriate.”	Change as proposed
Direct Reference: p31		
Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action
1# 1st paragraph/Image 32 – Metal studs should not be considered the only appropriate boundary demarcation treatment. Other materials, such as, granite sets are considered equally suitable. 2# Delete image 32 3# The Highway Authority will not accept the use of metal studs within the highway, with the exception of boundary demarcation, where they must be flush with the surface. They are considered dangerous (ref: High Street Kensington) in all other circumstances. 4# Delete image 35 as it would be a serious trip hazard. The Highway Authority does not use drainage gulleys in the road running surface.	1# Metal studs are the best way of achieving plot demarcation. Granite setts will quickly be re-specified as concrete edging if not adequately enforced, as image 38a. 2# Agreed 3# Agreed, the use of blistered finish within the existing paving material will be suggested, 4# Agreed	1# Change as proposed 2# Delete image 3# Remove reference to metal studs with the exception of boundary demarcation. 4# Delete image
Direct Reference: p32 street trees		
Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action

1# These should not be planted within the visibility splays.	1# Accept	1# Change as proposed and address other points made by amending text and clarifying terminology.
2# It should state that the Highway Authority will ask for commuted sums for maintenance of trees.	2# Accept	2# Add text explaining commuted sums for maintenance of trees or page 32.
3# What is "Amsterdam soil"? There is concern that it will not appropriately restrict root growth therefore affecting the highway and leading to increased maintenance.	3# Noted	3# A clearer definition of Amsterdam soil will be added to the document.
4# No references to tree species found on the given website. The link should be more specific.	4# Noted	4# An advice note of tree species will be added to the website.

Direct Reference: Page 33 – Street Trees

Contact Name: A. Burgess

Organisation: Roydon Action Group

Reference: 133

Summary of comments

Response to comments

Summary of proposed action

Information on trees
Oak spreads and needs to be cut back
Dawn Redwood needs park like setting
Ash has shallow roots

Accepted that clarification is required

Amend text as appropriate

Direct Reference: p34- adoption, management and maintenance

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Direct Reference: Page 34 – Adoption, Management

Contact Name: Mette McLarney

Organisation: Countryside Properties

Reference: 144

Summary of comments

Response to comments

Summary of proposed action

We would welcome a suggestion in the document that adopting authorities are more decisive during the design process thereby providing more clarity and certainty to all parties,

The UPS attempts to provide a greater certainty and consistency of requirements but does need to be backed up with site/area-specific design guidance. Agreed that this could be referred to.

Text added

perhaps through the production of design codes.

Direct Reference: Page 36 – Public Art

Contact Name: Peter Mountsteven

**Organisation: Harlow District Council,
Planning Officer, Development Control**

Reference: 122

Summary of comments

The reference to Public Artists being encouraged on all development projects on sites over 0.1ha should not be included in a document intended to provide LPA's with supplementary planning guidance. This matter properly addressed as part of S106 negotiations regarding major planning applications for sites with material public zones or civic open spaces.

Response to comments

The proposals in the UPS are advisory and are not intended to pre-empt the proper considerations of planning obligations. It is agreed that the relationship could be made clearer.

Summary of proposed action

Amend text where it appears prescriptive throughout the document.
Additional text to clarify

**Direct Reference: Page 36 – Street types,
Appendix 5**

Contact Name: P Cronk

Organisation: HBF

Reference: 110

Summary of comments

The recommendation of art contribution of 1% of development costs in schemes larger than 0.1 ha or 10 dwellings is contradictory to local plan policies where this only applies to major schemes.

Response to comments

The proposals in the UPS are advisory and are not intended to pre-empt the proper considerations of planning obligations. It is agreed that the relationship could be made clearer.

Summary of proposed action

Amend text where it appears prescriptive throughout the document.
Additional text to clarify

Direct Reference: Page 36 – Street Types

Contact Name: D Lander

Organisation: Boyer Planning

Reference: 129

Summary of comments

Public art requirements of 1% of total

Response to comments

The proposals in the UPS are advisory.

Summary of proposed action

Amend text where it appears prescriptive throughout the

development costs too prescriptive	It is agreed that this could be made clearer.	document. Additional text to clarify
Direct Reference: Page 36 – Street Types		
Contact Name: John Hammond	Organisation: Essex County Council Senior Policy Planner	Reference: 149
Summary of comments	Response to comments	Summary of proposed action
The intended speed measures in mixed-use streets would make them inappropriate for use as strategic bus routes, which the UPS states they may serve as.	‘Strategic’ is a misnomer and will be altered. Buses can negotiate speed tables and straddle speed cushions. The new road types have been safety-audited.	Text amended
Direct Reference: p36 Mixed use street – Type 2a		
Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action
1# “This road type may serve as a strategic bus route.” “The design speed is 20 mph... Speed restraint measures are required at least every 60 m along the street” However, this would be inappropriate for a strategic bus route.	1# Agreed. The mixed use street has a design speed of 20mph or less, in this instance any rapid transport system would be unwelcome and alternative route sought. However, a strategic bus route could in fact link in to the mixed use street providing rapid long distance transit and regular local services.	1# Amend text to, ‘This road type may serve as a bus route.’
2# 4th paragraph – Refer to H&T Strategic Development comments in previous consultation, they can not be ignored.	2# All text and figures in paragraph 4 p36 have been subject to change and review by the ECC Safety audit team. The UPS aims to provide information on how to achieve the mixed-use street type without being too prescriptive. For example it may not be possible for a single street to have a double row of trees at equal spacing or “trees should <i>generally</i> be spaced at a <i>minimum</i>	2# Amend terminology and prescriptive text.

of 17m centres.....”

Direct Reference: p37

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

Response to comments

Summary of proposed action

Image 26b – this image should be amended to reflect Option 2 in Appendix 6 rather than Option 1 as presently shown, which should be deleted from the document. Also note that the title is incomplete.
Image 26C – delete - no crossroads will be permitted by the Highway Authority
Image numbering on this page appear to be out of sequence with the whole document.

Accept.

Amend and delete images as suggested. Image 26c is to be deleted and page numbering will be reworked to individual numbered paragraphs as throughout the rest of the document.

Direct Reference: p39

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

Response to comments

Summary of proposed action

1# Paragraph 4
Change reference of “short length” to “pinch point”

1# Accept

1# Change in terminology.

2# 4.5m is too narrow for vehicles to pass and should be changed to 4.8m.

2# Play streets and home zones are specifically design as to reduce the ease and speed of vehicles passing through them. Passing points for two vehicles should be designed into the street. Other elements could include planting, trees and seating.

2# No action required

3# 40m is far too long length for single track; it should be a maximum of 20m.	3# Agreed,	3# Passing points will be more regular in the revised proposals.
4# "Cul-de-sac and one way streets are not encouraged" – Cul-de-sacs and appropriately designed one way streets would be the safest options for "play streets".	4# Cul-de-sac's and one-way streets have not been ruled out but are not the preferred options. Through traffic serving a limited number of dwellings will not be used a great deal. With a design speed of 20mph and other obstacles including areas for play, general vehicle use will not be encouraged.	4# No action required
5# Paragraph 6 Sight lines – Play streets should be an X of 2.4m not 2m. Y distance should be 33m not 12m. 20mph roads x = 2.4m and y = 33m	5# See Essex Design Guide, p124 and Manual for Street (Oct 2006 draft) p131. The Manual for Streets suggest that the Y distance on a 20mph road can be as low as 23m.	5# No action required
6# Image 50 does not incorporate any of the required visibility splays.	6# Accept	6# Add visibility splays

Direct Reference: Page 41 – Private Space, design criteria

Contact Name: D Lander	Organisation: Boyer Planning	Reference: 129
Summary of comments	Response to comments	Summary of proposed action
Requirements for communal space of 25m ² per dwelling at densities above 50 dph too prescriptive	This is guidance and is considered necessary to achieve an adequate level of open space provision.	Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 41 – Private Space, design criteria

Contact Name: Maria Burgess	Organisation: Loughton Town Council	Reference: 148
Summary of comments	Response to comments	Summary of proposed action

<p>Would not support less space being allocated for individual private gardens in return for high quality safe public spaces and communal private spaces because individual defensible space is vital.</p>	<p>'Defensible space' can still occur at the rear of properties with communal space beyond. Balconies are a further option but it is recognised that clearer illustration of communal/private open space arrangements is required</p>	<p>Illustration 57 amended.</p>
<hr/>		
<p>Direct Reference: Page 41 – Private Space</p>		
<p>Contact Name: Sophie O'Hara Smith</p>	<p>Organisation: Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson</p>	<p>Reference: 162</p>
<hr/>		
<p>Summary of comments</p> <p>The supplement promotes communal private space but says there is no obligation for public open space or private space. The rigid requirement for 25m² of communal space per unit will affect the flexibility of the design and may promote unrealistic block sizes. This requirement should be relaxed and the mix of public, private and communal space should be determined through design. Well designed and managed public open space is often more desirable and usable than communal private space which can create a lack of privacy for internal rooms. Apartments may benefit more from balconies and access to public open space. Houses need private space however small.</p>	<p>Response to comments</p> <p>This is guidance and is considered necessary to achieve an adequate level of open space provision. The UPS relates to compact urban environments and states that as densities rise, fewer private gardens can be accommodated. The UPS suggests that communal private open space is a realistic option to be considered in more compact urban developments. It is accepted that the document is overly-prescriptive in places.</p>	<p>Summary of proposed action</p> <p>Amend text where it appears prescriptive throughout the document.</p>
<hr/>		
<p>Direct Reference: Page 42 – Private Space, design criteria</p>		
<p>Contact Name: Frances Falconer</p>	<p>Organisation: Natural England</p>	<p>Reference: 150</p>

Summary of comments	Response to comments	Summary of proposed action
<p>Under ‘Design criteria for private communal space’ it is suggested that “and other biodiversity enhancements” should be added to point 5</p>	<p>Agreed</p>	<p>Text amended</p>
<p>Direct Reference: Page 44 – Activity, Accommodating the car</p>		
<p>Contact Name: Peter F. Askew (Chairman)</p>	<p>Organisation: Retirement Housing Group</p>	<p>Reference: 126</p>
Summary of comments	Response to comments	Summary of proposed action
<p>The proposals in the Urban Place Supplement will be expensive and may be impossible to implement on some sites.</p> <p>We note that, over 50 dph only underground, under-deck, multi-storey or under-croft parking will be acceptable.</p> <p>We would argue that parking policies should recognise variations of requirement depending on the market segment proposed: older people’s housing with its lower parking requirements should be recognised as a distinctive part of the housing market where surface parking should be permitted, not prohibited.</p> <p>Even on high density retirement housing schemes courtyard parking to the rear should be both possible and acceptable to planners.</p>	<p>The proposals in the UPS should be applied where it is reasonably possible to do so; its requirements are not prescriptive. Parking policy is not affected by the UPS proposals. Delivery of high quality and generous amounts of communal space seems ideally suited to elderly persons’ housing.</p> <p>It is judged that the parking options suggested are necessary above 50 dph to avoid compromising the quality of the public and private realm. A variety of solutions is possible however and cases will be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places.</p>	<p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: Page 44 – Activity, Accommodating the car</p>		
<p>Contact Name: P Cronk</p>	<p>Organisation: HBF</p>	<p>Reference: 110</p>

Summary of comments	Response to comments	Summary of proposed action
<p>Parking requirements are likely to be extremely expensive to implement</p>	<p>Any increased costs related to the UPS will result in increased value as well as additional benefits in terms of economic, environmental and social sustainability. The UPS is planning guidance and each development proposal will be judged in relation to site specific considerations.</p> <p>It is judged that the parking options suggested are necessary above 50 dph to avoid compromising the quality of the public and private realm. A variety of solutions is possible however and cases will be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places.</p>	<p>Amend text where it appears prescriptive throughout the document.</p>
<p>Underground and under deck parking present very serious crime and safety issues,</p> <p>No evidence to substantiate the requirement for 5% of parking spaces to be for disabled people</p>	<p>Security of parking is dealt with in the document (p46) but could be further emphasised.</p> <p>Reference to a particular level of parking for disabled people removed as standards vary. Will be dealt with through normal planning procedures.</p>	<p>Minor text amendment</p> <p>Text amendment. Sentence added to cover the design of vehicle parking spaces for disabled people.</p>
<p>Direct Reference: Page 44 – Activity, accommodating the car</p>		
<p>Contact Name: Mette McLarney</p>	<p>Organisation: Countryside Properties</p>	<p>Reference: 144</p>

<p>Summary of comments</p> <p>Each development should consider a parking design on its own merits; we cannot see why multi-deck parking is appropriate for urban extensions when there are several other solutions.</p>	<p>Response to comments</p> <p>A variety of solutions is possible however and cases will be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places.</p>	<p>Summary of proposed action</p> <p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: Page 44 – Activity, accommodating the car</p>		
<p>Contact Name: Madalitso Alfazema</p>	<p>Organisation: McCarthy & Stone Sustainability Committee</p>	<p>Reference: 146</p>
<p>Summary of comments</p> <p>The parking requirements are onerous and neglect the fact that each site is unique and the specified strict solution to parking will not always be achievable due to site-specific constraints.</p>	<p>Response to comments</p> <p>Every parking approach has its own merits and the UPS suggests that a variety of approaches is possible, even on smaller sites. Local planning authorities will be able to negotiate on the basis of viability and it will not be possible to impose a single solution county-wide. It is accepted that the document is overly prescriptive in places.</p>	<p>Summary of proposed action</p> <p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: Page 44 – Activity, Accommodating the car</p>		
<p>Contact Name: Stuart Rickards</p>	<p>Organisation: Environment Agency</p>	<p>Reference: 161</p>
<p>Summary of comments</p> <p>The issue of underground/underdeck parking requires greater clarity with reference to flood risk. The use of underground parking should be restricted in areas of high risk of flooding.</p>	<p>Response to comments</p> <p>It is accepted that this point needs to be covered and additional text will be agreed to meet the concerns of the Environment Agency</p>	<p>Summary of proposed action</p> <p>Additional text</p>

Accommodating the car**Contact Name:** Sophie O'Hara Smith**Organisation:** Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson**Reference:** 162

Summary of comments

The parking section is much too prescriptive in requiring underground, undercroft, underdeck or multi-storey parking. Densities of 50-60dph for example offer much more scope for integral or on street parking. Densities of 75 dph plus with 100% parking may well require one of the above solutions to provide for the bulk of parking on site.

Response to comments

It is judged that the parking options suggested are necessary above 50 dph to avoid compromising the quality of the public and private realm. A variety of solutions is possible however and cases will be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places.

Summary of proposed action

Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 44 – Activity, Accommodating the car**Contact Name:** Sophie O'Hara Smith**Organisation:** Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson**Reference:** 162

Summary of comments

Management and maintenance of underground, undercroft, underdeck parking will be expensive with safety and security issues. Will RSL's accept these costs and potential problems. These car parks are generally not well liked. Again with large sites and urban extensions one would realistically expect a range of parking solutions with the most compact development at the centre rather than a rigid prescription.

Response to comments

It is judged that the parking options suggested are necessary above 50 dph to avoid compromising the quality of the public and private realm. A variety of solutions is possible however and cases will be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places.

Summary of proposed action

Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 44 – Activity, Accommodating the car

Contact Name: Sophie O'Hara Smith

Organisation: Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson

Reference: 162

Summary of comments

The guidance needs to be realistic about site constraints that may prevent underground parking eg services, flooding or archaeological concerns.

Response to comments

If site constraints preclude underground parking, it will not be expected.
Flooding: The Environment Agency has made this point and additional text will be agreed to meet its concerns.
Archaeology: Reflects concern expressed by the CC Archaeology Branch. The presence of below-ground archaeology will be a design constraint identified within the context appraisal. Local Plan policies will safeguard archaeological interests. Text altered
Services: It is accepted that underground services could present problems. A local planning authority could take account of any overriding site-specific considerations. The prescriptive nature of the text is being reduced and will allow these exceptions to be made.

Summary of proposed action

Additional text

Direct Reference: p44 low parking provision

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

Add LPA to last paragraph "These management proposals should to be discussed with the neighbouring community, Highway Authority and Local Planning Authority..." as the LPA is

Response to comments

Accept suggested additional text.

Summary of proposed action

Amend

responsible for parking requirements.

**Direct Reference: Page 45 –
Accommodating the car**

Contact Name: Sue Locke

Organisation: Uttlesford Area Access Group

Reference: 113

Summary of comments

Response to comments

Summary of proposed action

The Uttlesford Area Access Group has reservations about the car parking criteria, namely: under deck, undercroft, multi storey and underground.
To insure social inclusion we feel these forms of parking make users feel more vulnerable. Access to all buildings should provide safe routes allowing free independent access. As a group we are not in favour of these parking options.
The lifetime homes standards stipulate requirements for parking and external entrances.
The group would also seek to ensure that public space around the development meet existing SPD to ensure social inclusion for all.

Every parking approach has its own merits and the UPS suggests that a variety of approaches is possible, even on smaller sites. If site constraints preclude underground parking, it will not be expected. The UPS makes reference to the need to accommodate the requirements of disabled people in access arrangements for underground parking etc (P46) and the need to provide lifts is stressed. UPS requirements would not override Part M Building Regulation requirements.
The Lifetime Homes standard requires that , where parking is provided, this should be close to the entrance to homes. Whilst this will often possible, it is considered that a expectation that this will always be the case would unnecessarily limit the scope of parking solutions and could have a detrimental affect on the quality of public space adjacent to homes.
Underground parking should be naturally ventilated wherever possible and additional text will cover this point

Text amended

**Direct Reference: Page 45 –
Accommodating the car**

Contact Name: D Lander

Organisation: Boyer Planning

Reference: 129

Summary of comments

Car parking requirements at densities over 50 dph too prescriptive

Response to comments

It is judged that the parking options suggested are necessary above 50 dph to avoid compromising the quality of the public and private realm. A variety of solutions is possible however and cases will be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places.

Every parking approach has its own merits and the UPS suggests that a variety of approaches is possible, even on smaller sites. The car parking options outlined are considered to be necessary if the quantity and quality of the public and private realm is not to be compromised.

Summary of proposed action

Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 45 –
Accommodating the Car

Contact Name: Mel Dunbar

Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey, Persimmon Homes, Redrow Homes, Taywood Homes

Reference: 143

Summary of comments	Response to comments	Summary of proposed action
<p>There is no justification given for the 50dph threshold above which there should be none, or very little, surface parking. It is possible to have a well designed, high quality environment with surface parking at densities higher than 50dph.</p>	<p>The UPS is moving away from car dominated developments and it is judged that the parking options suggested are necessary above 50 dph to avoid compromising the quality of the public and private realm. A variety of solutions is possible however and schemes would be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places. This has been addressed and inventive, well-designed schemes below the density threshold would not be precluded.</p>	<p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: Page 45 – Accommodating the Car</p>		
<p>Contact Name: Mel Dunbar</p>	<p>Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey, Persimmon Homes, Redrow Homes, Taywood Homes</p>	<p>Reference: 143</p>
Summary of comments	Response to comments	Summary of proposed action
<p>There will be an increased likelihood of underground service in town centres which will render underground parking prohibitively expensive or impossible.</p>	<p>It is accepted that underground services could present problems. A local planning authority could take account of any overriding site-specific considerations. The prescriptive nature of the text is being reduced and will allow these exceptions to be made,</p>	<p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: Page 45 – Accommodating the Car</p>		
<p>Contact Name: Mel Dunbar</p>	<p>Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey, Persimmon Homes, Redrow Homes,</p>	<p>Reference: 143</p>

Taywood Homes		
Summary of comments	Response to comments	Summary of proposed action
Town centre sites are likely to contain significant archaeological remains, dealing with which is likely to add significantly to the time scale of implementing underground car park provision.	Reflects concern expressed by the CC Archaeology Branch. The presence of below-ground archaeology will be a design constraint identified within the context appraisal. Local Plan policies will safeguard archaeological interests. Text could be altered to reflect this.	Amend text to include reference to the exceptional circumstances that archaeological remains could present. Historic Towns website link included. Amend text where it appears prescriptive throughout the document.
Direct Reference: Page 45 Accommodating the car		
Contact Name: Sophie O'Hara Smith	Organisation: Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson	Reference: 162
Summary of comments	Response to comments	Summary of proposed action
Neither underground parking nor communal space are essential in developments at the lower end of the UPS density range.	It is judged that the parking options suggested are necessary above 50 dph to avoid compromising the quality of the public and private realm. A variety of solutions is possible however and cases will be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places. This has been addressed and inventive, well-designed schemes below the density threshold would not be precluded.	Amend text where it appears prescriptive throughout the document.
Direct Reference: p46 Under-deck parking		
Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action

Ramp gradients – 1 in 7 can only be used where there is no pedestrian use of ramps. “Access ramps should be no wider than 3.5m with signalled controlled entry and exit for one-way working” – this depends on what type of road the entrance is located on. This will not be allowed on County routes as this may cause queuing which tails back onto the public highway, consideration will be given on lower categories of road, depending on individual circumstances.

Accept

Change as suggested amendments and additional comments.

Direct Reference: Page 47 –
Accommodating the car

Contact Name: Vanessa Clarke

Organisation: ECC Archaeological Branch
Development Control

Reference: 120

Summary of comments	Response to comments	Summary of proposed action
<p>Below ground archaeological deposits. Careful consideration of foundation design will be critical to the avoidance of damage to these sensitive deposits. Frequent resort to underground parking would be quite unsustainable in terms of the historic environment. Clearly part of the solution will be multi-storey car parking as recommended on page 47. In relation to the historic core fortunately the extensive urban settlement studies undertaken in Essex in the late 1990's have provided a resource which maps the extent of the historic cores for many of the historic towns. It is recommended that a list of these should be added as an appendix.</p>	<p>The presence of below-ground archaeology will be a design constraint identified within the context appraisal. Local Plan policies will safeguard archaeological interests. Text could be altered to reflect this.</p>	<p>Amend text to include reference to the exceptional circumstances the archaeological remains could present.</p> <p>Add link to website</p>
<p>Direct Reference: Page 48 – Cycle Parking and Storage, routes between destinations</p>		
Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
Summary of comments	Response to comments	Summary of proposed action
<p>The bottom paragraph of this section seems something of an understatement. Natural England feels that there is potential here for every new development to play its part in contributing to the fulfilment of green infrastructure plans. Well-designed and landscaped cycle routes, footpaths and other linear features can provide essential links for both people and wildlife between habitats and areas of public space.</p>	<p>The UPS covers this point but further emphasis given by text addition</p>	<p>Amend text</p>
<p>Direct Reference: Page 48 – Cycle Parking</p>		

and Storage, routes between destinations		
Contact Name: John Hammond	Organisation: Essex County Council Senior Policy Planner	Reference: 149
Summary of comments	Response to comments	Summary of proposed action
'Cycle parking' should be amended to 'Cycle facilities'	Agreed	Amend text
Direct Reference: Page 49 – Waste Recycling		
Contact Name: Peter F. Askew (Chairman)	Organisation: Retirement Housing Group	Reference: 126
Summary of comments	Response to comments	Summary of proposed action
<p>There are a number of significant design, cost and other implications introduced by these proposals.</p> <p>We would argue that more flexibility is required for waste management/collection on retirement and extra care housing schemes, where staff collection and transfer to a central collection point on site is possible, rather than increasing the amount of storage to be provided in kitchens.</p> <p>It is important to note that residents in retirement housing tend to generate only small amounts of waste and, although very simple subdivision may be possible, complex systems of recycling are likely to confuse elderly residents.</p> <p>Refuse is best stored away from dwellings in a separate well-ventilated building or screened</p>	<p>Special circumstances, such as warden/staff arrangements on sites of sheltered housing etc, could result in adjustments to the requirements being made on specific sites. The text is made less prescriptive and will allow this to happen. Systems are in place to ensure adherence to local authority refuse collection. The UPS presents an aspiration but would not over-rule existing local arrangements.</p>	<p>Amend text where it appears prescriptive throughout the document.</p>

area where smells (particularly in warm weather) can be dissipated without harming amenity. Chutes are a nightmare in terms of ensuring cleanliness and fire safety.

Direct Reference: Page 49 – Waste Recycling

Contact Name: D Lander

Organisation: Boyer Planning

Reference: 129

Summary of comments

Response to comments

Summary of proposed action

Waste recycling requirements too prescriptive. It may not be possible to accommodate waste storage as specified in the UPS in all dwellings

It is accepted that the wording is too prescriptive in some places.
The UPS presents an aspiration but would not over-rule existing local arrangements.

Amend text where it appears prescriptive throughout the document.

Direct Reference: Page 50 – Waste Recycling

Contact Name: Mel Dunbar

Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey, Persimmon Homes, Redrow Homes, Taywood Homes

Reference: 143

Summary of comments

Response to comments

Summary of proposed action

The prescriptive level of detail regarding the different types of waste containers is entirely inappropriate for a SPD and cannot be seen as a matter for planning control.

It is accepted that the wording is too prescriptive in some places.
The UPS presents an aspiration but would not over-rule existing local arrangements.

Amend text where it appears prescriptive throughout the document.

Direct Reference: p51 Access for collection vehicles

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

Response to comments

Summary of proposed action

The policy should be “refuse collectors should

Accept

Change as suggested amendments and

not have to walk more than 25m” not “reverse vehicles 25m”. It should be designed so vehicles do not have to reverse.
Can it be clarified whether the hard standing or lay-by will be required to be within the highway or not. Is this for the residents or for the refuse vehicle – further clarification required? A diagram may be of benefit.

additional comments.

Direct Reference: p51 Management and maintenance

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

Last paragraph is written as a catchall for the previous paragraph yet it can not remain like this. The Highway Authority will not take over responsibility for car clubs, car sharing schemes, facilities management or on-site waste recycling etc which have no relation to the highway authority.

Response to comments

The referred paragraph is misleading and reordering the text will help to clarify that the Highway Authority will not take over responsibility for car clubs, car sharing etc

Summary of proposed action

Amend to clarify

Direct Reference: Page 54 – Privacy and Noise

Contact Name: Karen Syrett

Organisation: Colchester Borough Council

Reference: 142

<p>Summary of comments</p> <p>The document suggests reducing back to back distances between buildings from 25m to 20m for compact urban development.</p>	<p>Response to comments</p> <p>This would be recommendation for higher density developments, not a suggestion for use beyond UPS sites. It presents an aspiration but would not over-rule existing local arrangements. Other local planning authority requirements may take precedence, The prescriptive nature of the text is reduced to reflect this.</p>	<p>Summary of proposed action</p> <p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: Page 59 – Adaptability, durability and accessibility</p>		
<p>Contact Name: D Lander</p>	<p>Organisation: Boyer Planning</p>	<p>Reference: 129</p>
<p>Summary of comments</p> <p>The rigid application of lifetime homes standard may prevent development from meeting other important objectives</p>	<p>Response to comments</p> <p>It is accepted that the text is too prescriptive on places and could impact upon delivery of other sustainability objectives</p>	<p>Summary of proposed action</p> <p>Amend text where it appears prescriptive throughout the document.</p>
<p>Direct Reference: Page 61 – Influences Upon Sustainability</p>		
<p>Contact Name: Roy Warren</p>	<p>Organisation: Sport England</p>	<p>Reference: 111</p>
<p>Summary of comments</p> <p>Request that consideration be given in section 6, to encourage physical activity and improve health and active communities. Sport England has launched “Active Design” that developments should adopt to make communities more active and healthy. www.sportengland.org/planning_active_design CABE have a similar document that would be useful to refer to. Reference to page 17-41 would be useful to include in the UPS which includes some case studies.</p>	<p>Response to comments</p> <p>Agreed, reference to physical activity is important to encourage and improve the health and activities with the community.</p>	<p>Summary of proposed action</p> <p>Refer to the Active Design initiative and CABE’s document.</p>

Direct Reference: Page 61 – Influences Upon Sustainability

Contact Name: John Hammond

Organisation: Essex County Council Senior Policy Planner

Reference: 149

Summary of comments

The section on Influences upon Sustainability should include access to bus services. Development should be designed around bus services from the outset.

Response to comments

This is mentioned already, however addition text will be added to p61

Summary of proposed action

Add “to walkable neighbourhoods” the words “good access to public transport”

Direct Reference: Page 61 – Influences Upon Sustainability

Contact Name: Frances Falconer

Organisation: Natural England

Reference: 150

Summary of comments

Natural England welcomes the Sustainability Objectives but we have the following points to make:

- Spatial criteria: this should include connectivity of habitats and areas of accessible natural green space.
- Buildings and site criteria: to be consistent with PPS9, the wording must be changed from “Minimising ecological damage” to “Conserving and enhancing biodiversity and geology”.

Community criteria: provision of multifunctional accessible green space should be included here.

See pages 79-80 summary table.

This guides the best location for compact urban development, based upon workability, accessibility. See pages 79-80.

Agreed

The sustainability objectives of community criteria are set out in a table on p61. Green spaces are not mentioned but safe public spaces are, green spaces are covered in greater detail on p80.

Summary of proposed action

No action required

Change wording to address PPS9.

Add green space to the community criteria section of sustainability objectives.

Direct Reference: p61 influences on sustainability		
Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action
The section on Influences upon sustainability should include access to bus services. Bus services are an important component of sustainability for many reasons e.g. social inclusion; congestion relief; carbon footprint; climate change, etc. Development should be designed around bus services from the outset to maximise its convenience for door-to door travel and to contribute to its economics of operation. Often past developments have become dominated by multiple car ownership because of a lack of access to convenient bus services.	Agreed.	Amend text with reference to access to bus services will be added the spatial criteria set of objectives.
Direct Reference: Page 64 – Sustainable Urban Extensions		
Contact Name: Blaise Gammie	Organisation: Strategic Planning Officer, Essex County Council	Reference: 131
Summary of comments	Response to comments	Summary of proposed action
On page 64 (Sustainable Urban Extensions) the figure of 6,000 homes supporting a new secondary school is open to debate. If all dwellings are family homes, as few as 3,000 homes would generate the pupil yield equating to the smallest secondary school we would seek to establish. The Chelmsford North (Beaulieu Park II) proposal for example is of around 3,000 homes and we are in negotiation for a secondary school site. For info the same figure	Mix of dwelling types will be for greater than simply housing. Sustainable urban extensions will have a mix of high density and low density areas. Along with the mix of densities there will be a mix of dwelling types including apartments. Beaulieu Park is all housing- a true sustainable urban extension includes a greater mix of housing other than 3-4 bed family housing.	Change text from “an extension of a least 6000 homes” to “an extension <i>in the region of</i> 6000 homes”

for primary is 700 houses.

Direct Reference: Page 64 – Sustainable Urban Extensions

Contact Name: Gabrielle Rowan

Organisation: Pegasus Planning Group on behalf of Persimmon Homes (Essex) Ltd, Martin Grant Homes and George Wimpey

Reference: 132

Summary of comments

The Supplement defines a Sustainable Urban Extension (SUE) as an extension likely to comprise 2,000 dwellings with a gross site area of at least 50ha and assumes a population of approximately 5,000 (which equates to 2.5 people per household – which is higher than the national average based on the 1991 census figures for Essex).

Response to comments

The UPS states “A single 50ha extension would have a *theoretical* ‘capacity’ of 2,000 homes...” The UPS is not advocating that sustainable urban extensions comprise of entirely the same dwelling type- on the contrary; sustainable urban extensions need to consist of various dwelling types at various densities across the site.

Summary of proposed action

Change text from “A single 50ha extension would have a *theoretical* ‘capacity’ of 2,000 homes...” to “A single 50ha extension would have a *theoretical* ‘capacity’ in the region of 2,000 homes...”

Direct Reference: p67 compact development

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

Underground/under decked parking in some cases can be done, if the development is large enough, but on a smaller development the cost will be so high and therefore it will not be economic to provide.
On street spaces for visitors and customers will be difficult to control and could result in residents using these spaces.
Robust Urban Form - Parking recommendations need to be in line with our parking standards, e.g. 1 space/75m² commercial. This is not in line with ECC parking standards. There are

Response to comments

Each car parking solution suggested in the UPS should be applied to the individual site criteria.

The on street parking will be subject to parking regulations and/or be enforced by a management company if the parking is located within the development.

The UPS is not moving away from the EPOA parking standards, however if the site is located

Summary of proposed action

No amendment required

No amendment required

No amendment required

various requirements for different commercial uses. Bus services within 400m walking distance of every dwelling should be included within the requirements for Compact Development and Robust Urban Form.	near major public transport facilities there would be scope for reducing park parking levels. Agreed	Bus services within 400m walking distance of every dwelling will be added to the box criteria for Compact Development.
Direct Reference: Page 68 – Density		
Contact Name: D Lander	Organisation: Boyer Planning	Reference: 129
Summary of comments	Response to comments	Summary of proposed action
Density requirements too prescriptive, also make no reference to PPG3, which is more flexible- 'design and layout to be informed by the wider context' (Paragraph 56-PPG3) Average densities for 65 dph for a sustainable urban extension are inappropriate	The UPS is in alignment with PPS3 however in many cases densities will have to be determined locally. (See context appraisal) Average densities in sustainable urban extensions include higher density neighbourhood centres and lower density housing along the fringes of the development. It is accepted that the text is inappropriately prescriptive in places	No action required Amend text where it appears prescriptive throughout the document.
Direct Reference: Page 68 - Density		
Contact Name: Karen Syrett	Organisation: Colchester Borough Council	Reference: 142
Summary of comments	Response to comments	Summary of proposed action
It is felt that if the UPS is to be acceptable to the Council greater flexibility needs to be included to enable the Council to identify areas where lower densities or different types of development than that prescribed will be appropriate.	The UPS is a guidance document only that rather than being too prescriptive can be applied locally in accordance with local policy and development frameworks. See context appraisal methodology p8. It is accepted that the text is inappropriately prescriptive in places	No action required. Amend text where it appears prescriptive throughout the document.
Direct Reference: Page 68 - Density		
Contact Name: Mel Dunbar	Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey,	Reference: 143

Persimmon Homes, Redrow Homes, Taywood Homes		
Summary of comments	Response to comments	Summary of proposed action
The requirement for development over 50ha to include 100% power generation goes far beyond national guidance and what can be considered to be reasonable. The visual impact of measures (solar panels, wind turbines etc) seems to have been overlooked.	The UPS is a guidance document only and highlights a series of measures that could combine to create percentages of on site renewable energy. In cases where wind turbines are not suitable other measures could be applied. For large developments CHP is a viable alternative for an ESCO (Energy Services Company) It is accepted that the text is inappropriately prescriptive in places	No action required Amend text where it appears prescriptive throughout the document.
Direct Reference: Page 68 – Sustainable Urban Extensions		
Contact Name: Mette McLarney	Organisation: Countryside Properties	Reference: 144
Summary of comments	Response to comments	Summary of proposed action
The requirement for power generation to meet 100% of needs raises the issue of the monopoly that one supplier would have. We suggest that this matter should be explored but not insisted upon.	The UPS is guidance only and a variety of supply is the key. It is accepted that the text is inappropriately prescriptive in places	No action required. Amend text where it appears prescriptive throughout the document.
Direct Reference: Page 68 - Density		
Contact Name: Melville Dunbar	Organisation: Melville Dunbar Associates representing Crest Nicholson, George Wimpey, Persimmon Homes, Redrow, Taywood Homes	Reference: 143
Summary of comments	Response to comments	Summary of proposed action
The density threshold above which the UPS will be applied (50 dph) is surprisingly low and arbitrary, taking no account of the flexibility and	The UPS is moving away from car dominated developments and it is judged that the parking options suggested are necessary above 50 dph	No action required. OR Amend text where it appears prescriptive throughout the

efficient density which can be achieved under Essex Design Guide criteria. Attractive housing schemes above this density have been built without recourse to underground or extensive undercroft parking.	to avoid compromising the quality of the public and private realm. A variety of solutions is possible however and schemes would be judged on their own merits taking into account site constraints and the quantity and quality of public and private spaces proposed. It is accepted that the document is overly prescriptive in places. This has been addressed and inventive, well-designed schemes below the density threshold would not be precluded.	document.
Direct Reference: Page 68 - Density		
Contact Name: John Hammond	Organisation: Essex County Council Senior Policy Planner	Reference: 149
Summary of comments	Response to comments	Summary of action
Description of Sustainable Urban Extension should have an additional bullet point: 'bus services within 400m of all parts of the development'	Agree	Amend text as suggested.
Direct Reference: Page 69 – Densities for Sustainable Development		
Contact Name: A French	Organisation:	Reference: 140
Summary of comments	Response to comments	Summary of proposed action
Image 92 EDG 50-50 dph – printing error	Agree	Amend text as suggested.
Direct Reference: Page 70 – Development Types		
Contact Name: Karen Syrett	Organisation: Colchester Borough Council	Reference: 142
Summary of comments	Response to comments	Summary of proposed action
The definitions and classifications of areas where high density development is appropriate	The UPS is a guidance document only which is a context lead process- avoiding 'inner city'	No action required.

<p>within the Draft UPS are too prescriptive and embrace most of the urban area of Colchester and many of the principal towns and villages. As a consequence 'inner-city' type scales and types of development with an emphasis on flats will in future predominate. This overemphasis on higher, flatted development will coincide with a period when Colchester like other towns is facing saturation of this sector. The pattern of new development may not reflect or be harmonious with the existing character of development in the town, much of which is of architectural or historic importance. The emphasis on flatted development is likely to reduce the availability of 'family' housing in all but suburban locations.</p>	<p>scale development in the wrong locations.</p>	<p>The UPS's emphasis is upon variety that caters for all needs including 'family' housing. It is accepted that the document is overly prescriptive in places.</p>	<p>Amend text where it appears prescriptive throughout the document.</p>
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Direct Reference: Page 71 – Buildings and Site Criteria

<p>Contact Name: John Peck Summary of comments</p>	<p>Organisation: na Response to comments</p>	<p>Reference: 124 Summary of proposed action</p>
<p>I was very pleased to receive a copy of the UPS and am especially pleased to see that you are including in it the requirement for renewable energy technology to be integrated into buildings or neighbourhoods. Does this include solar panels on all roofs? Is this a requirement that can be demanded at local planning level even if the government has not stipulated such in legislation?</p> <p>The EDI process appears to be very forward-looking and commendable - I look forward with interest to see whether its requirements are</p>	<p>The UPS is a guidance document only. Noted.</p>	<p>No action required. Amend text where it appears prescriptive throughout the document.</p>

implemented at the 'coal face'.

Direct Reference: Page 73 – Measuring Environmental Sustainability

Contact Name: P Cronk

Organisation: HBF

Reference: 110

Summary of comments

Response to comments

Summary of proposed action

The measurement of environmental performance of buildings is shortly replaced by the Code for Sustainable Homes. The same code will also take on board issues related to sustainable construction methods.

Both the measure of environmental performance of buildings and the code of sustainable homes will be referenced and related to the UPS and where they are placed in the scope of the document.

Reference the code for sustainable homes and how it is placed within the scope of the UPS. See p5, scope and p73 measuring the environmental sustainability of development.

Consequently, these matters will now be dealt with by means others than those specified within the County's draft document.

The code for sustainable homes is a voluntary code unlike the UPS which will be adopted SPD.

Direct Reference: Page 73 – Sustainable Construction

Contact Name: Mel Dunbar

Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey, Persimmon Homes, Redrow Homes, Taywood Homes

Reference: 143

Summary of comments

Response to comments

Summary of proposed action

There is no reference to the Government's forthcoming Code for Sustainable Homes. The Code is based on voluntary compliance and the UPS should follow a similar, less prescriptive approach.

Agree

The code for sustainable homes will be referenced alongside the BREEAM Eco-homes standards as highlighted on p73.

Direct Reference: Page 76 – Renewable Energy Sources

Contact Name: Wai-Kit Cheung

Organisation: RPS/behalf of Fairview New Homes

Reference: 136

Summary of comments	Response to comments	Summary of proposed action
Greater flexibility for renewable energy requirements, change “every development must incorporate renewables..” to every development must wherever feasible incorporate renewables “	It must be remembered that the UPS is only a guidance document. The terminology will reflect this.	Amend document terminology.
Direct Reference: Page 78 – Sustainable Urban drainage Systems		
Contact Name: Georgie Cook	Organisation: Thames Water	Reference: 112
Summary of comments	Response to comments	Summary of proposed action
The use of well maintained SUDS is supported. Where SUDS are not well maintained they will be less effective in reducing peak flows and volumes and are therefore less likely to prevent surges in rainwater runoff reaching the sewer system potentially causing flooding. Thames would recommend referencing ‘Interim Code of Practice for SUDS’, National SUDS working group, July 2004.	Noted	Make reference to SUDS document ‘Interim Code of Practice for SUDS’ on page78.
Direct Reference: Page 78 – Sustainable Drainage Systems		
Contact Name: Stuart Rickards	Organisation: Environment Agency	Reference: 161
Summary of comments	Response to comments	Summary of proposed action
EA is pleased that SUDS have been covered and would advise that an addendum or extra appendices be added that highlight the CIRIA publications (listed) available via www.ciria.org/suds/publications.htm to give further guidance on SUDS.	Noted	Reference CIRIA document as suggested.

Direct Reference: Page 79 - Ecology and Biodiversity		
Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
Summary of comments	Response to comments	Summary of proposed action
It is suggested that the key statement is amended slightly to read “All new developments in Essex ...enhance existing biodiversity, create new habitats and resource the appropriate management of habitats into the future ”, to ensure that those habitats function after the development has taken place.	Agreed	Change text to p79 as suggested.
Direct Reference: Page 80 – Green Public Space		
Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
Summary of comments	Response to comments	Summary of proposed action
Suggests that it is made clear that preferred habitats for enhancement and creation will be those listed as of principal importance in Government Circular 06/2005 and highlighted within the UK and Essex BAP.	Agreed	Amend text as suggested referencing the government circular 06/2005.
Direct Reference: Page 80 – Green Public Space		
Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
Summary of comments	Response to comments	Summary of proposed action
Suggest that ‘Some areas should be left uncultivated’ be re-worded to: “Some areas should be managed for wildlife” because habitats will require management.	Agreed	Amend text as suggested.
Direct Reference: Page 68 - Density		
Contact Name: D Lander	Organisation: Boyer Planning	Reference: 129

Summary of comments	Response to comments	Summary of proposed action
CHP and GSHP requirements, especially in sustainable urban extensions where they should meet 100% of energy requirements are too inflexible. A target based system should be used.	The UPS is applying guidance to a target based system of 100% onsite renewable energy requirements.	No action required.
Direct Reference: Page 82 – Ecology and Biodiversity, The Green Points Table		
Contact Name: Peter Mountsteven	Organisation: Harlow District Council, Planning Officer, Development Control	Reference: 122
Summary of comments	Response to comments	Summary of proposed action
The term 'veteran trees' under the heading of <i>Loss of mature trees</i> should be defined in a footnote. English Nature defines a veteran tree as "a tree which, because of its great age, size or condition is of exceptional value culturally, in the landscape or for wildlife." [habitat]	Agreed	Amend text as suggested
Direct Reference: Page 82 – Ecology and Biodiversity, The Green Points Table		
Contact Name: Gabrielle Rowan	Organisation: Pegasus Planning Group on behalf of Persimmon Homes (Essex) Ltd, Martin Grant Homes and George Wimpey	Reference: 132
Summary of comments	Response to comments	Summary of proposed action
This is considered to be too subjective and does not provide any specific guidance on a site by site basis. This should perhaps be dealt with via the requirements of an EIA in the scoping opinion rather than within an Urban Place document. This system does not appear to be supported by any adopted planning policy and	The green points system is guidance only that aims to push biodiversity to the forefront of any development. The green points table is far from being prescriptive, allowing for various options in achieving the required points score.	Amend the green points system table to simplify the requirements b making the options clearer.

therefore should not override other applicable policies.

Direct Reference: Page 82 – Ecology and Biodiversity, The Green Points Table

Contact Name: P Cronk

Organisation: HBF

Reference: 110

Summary of comments

Response to comments

Summary of proposed action

The Green Point System is considered to be too subjective and deals only in generalities without any consideration of baseline data. For larger sites habitat surveys are likely to be more appropriate. Whilst useful for guidance, the Green Point System does not appear to be underpinned by any adopted planning policy, and so should not be used in an over rigid manner.

The green points system is guidance only that aims to push biodiversity to the forefront of any development.
The green points system aims to provided a recipe of possible ingredients in enhancing or mitigating biodiversity on all developments.

Amend the green points system table to simplify the requirements b making the options clearer.

Direct Reference: Page 82 – Ecology and Biodiversity, The Green Points Table

Contact Name: AJ Morton

Organisation:

Reference: 141

Summary of comments

Response to comments

Summary of proposed action

No justification for points: why is one square metre of pond equal to one tree or half a bird box?

Ecological scheme should be designed in response to the ecology of the site, not to meet an arbitrary points scheme

The green points system is guidance only that aims to push biodiversity to the forefront of all development.

It is recognised that any scoring system will prioritise elements which may result in sending out the wrong message. The green points system is seen as additional to ecological surveys not a replacement.

Amend the green point system table to simplify the requirements and scoring system by making the options clearer

Direct Reference: Page 82 – Ecology and Biodiversity, The Green Points Table

Contact Name: Frances Falconer

Organisation: Natural England

Reference: 150

Summary of comments

Response to comments

Summary of proposed action

The Green Points table is welcomed but it is considered that, in order to reflect the particular circumstances of a given development, further flexibility should be introduced by giving a points range for each habitat enhancement. This would allow an assessment using the Green Points system to more accurately reflect the quality of specific proposals. We would be happy to discuss ways in which introduction of a points range could be achieved if this would be of help to you.

The green points system is guidance only but it is recognised that any scoring system will prioritise elements which may result in sending out the wrong message in terms of particular elements of the natural environment.

Amend the green point system table to simplify the requirements and scoring system by making the options clearer

Direct Reference: Page 82 – Ecology and Biodiversity, The Green Points Table

Contact Name: Frances Falconer

Summary of comments

Higher weightings should be considered for walls covered with climbing plants, plants with a good source of nectar etc and tree planting or retention of trees, where native species in accordance with BAP targets are chosen

Organisation: Natural England

Response to comments

The green points system is guidance only. The complexity of the system has grown beyond a simple check list chart, especially when comparing individual ecological elements.

Reference: 150

Summary of proposed action

Amend the green point system table to simplify the requirements and scoring system by making the options clearer

Direct Reference: Page 82 – Ecology and Biodiversity, The Green Points Table

Contact Name: Frances Falconer

Summary of comments

Consideration should be given to offering a score by area rather than by individual plant or tree to enable planting schemes to be developed that focus on habitat rather than maximising density of planting

Organisation: Natural England

Response to comments

The green points system is guidance only. The complexity of the system has grown beyond a simple check list chart, especially when comparing individual ecological elements.

Reference: 150

Summary of proposed action

Amend the green point system table to simplify the requirements and scoring system by making the options clearer

Direct Reference: Page 82 – Ecology and Biodiversity, The Green Points Table		
Contact Name: Sophie O’Hara Smith	Organisation: Andrew Martin Associates on behalf of Bellway Homes Ltd (Essex Division) and Crest Nicholson	Reference: 162
Summary of comments:	Response to comments	Summary of proposed action
There is a disappointing attitude to trees within the document. The points system seems to suggest the loss of mature trees is not significant and can be mitigated for with a number of measures with no guarantee of a long term future. Mature trees are a valuable asset in urban locations and where healthy long term specimens exist, efforts should be made to incorporate these into a development. In other cases well planned replacement tree planting will enhance the quality of the environment.	The green points system is guidance only. The complexity of the system has grown beyond a simple check list chart, especially when comparing individual ecological elements. The green points system was produced working along side an ecologist. The scope of the green points system was purely based on ecological value rather than amenity. (which is dealt with throughout the document e.g. street trees)	Amend the green point system table to simplify the requirements and scoring system by making the options clearer Remove negative values.
Direct Reference: Page 88 – Applying the guidance – Development Scenarios		
Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
Summary of comments	Response to comments	Summary of proposed action
We advise that the following question (or similar) is asked within the generic assessment table: “Does the scheme threaten or offer opportunities to enhance biodiversity and/or geological features?” in order to ensure that the aim of enhancing existing biodiversity is met.	Agreed	Add “Does the scheme threaten or offer opportunities to enhance biodiversity and/or geological features?” before the table on p83.
Direct Reference: p90		
Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action

Diagram spelling mistake – buildings not buildinds to right of diagram	Noted	Amend as suggested.
Direct Reference: p91		
Contact Name: Emma Butler	Organisation: ECC Transportation and strategic development	Reference: 158
Summary of comments	Response to comments	Summary of proposed action
“Does the building layout take priority over the roads and car parking so that highways do not dominate?” A big estate should be designed around a bus route and bus stops should be included from the beginning.	The text refers to part of the Buildings for Life (BFL) assessment criteria questions for our development scenario. It is a question that all BFL assessments ask and require.	No amendment required
“Are the streets pedestrian, cycle and vehicle friendly?” Design speed should be less than 20mph rather than between 5 and 20mph.	Accept suggested amendment	Amend text: design speed should be less than 20mph rather than between 5 and 20mph.
Direct Reference: Page 98 – Case Studies		
Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
Summary of comments	Response to comments	Summary of proposed action
Natural England is disappointed to observe that none of the case studies within this section include provision for biodiversity.	Agreed. The case studies will not be included in the final version of the UPS.	Delete case studies.
Direct Reference: Page 98 – Case Studies		
Contact Name: Mel Dunbar	Organisation: Melville Dunbar Associates on behalf of Crest Nicholson, George Wimpey, Persimmon Homes, Redrow Homes, Taywood Homes	Reference: 143
Summary of comments	Response to comments	Summary of proposed action
With one exception the case studies are from	Agreed. The case studies will not be included in	Delete case studies.

London although the introductory text says they should not be seen as trying to apply the London model to Essex. This is likely to lead to confusion and they should not be included in the consultation document as they will not be included in the SPD.

the final version of the UPS.

Direct Reference: p106- appendix 1 glossary

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

Walkable definition needs changing, distance and time should be reversed to read 400 or 800m (5 to 10 minutes).

Response to comments

Accept amendments

Summary of proposed action

Amend text to “distance and time should be reversed to read 400 or 800m” (5 to 10 minutes).

Direct Reference: Appendix 2 – Planning Context

Contact Name: Frances Falconer

Organisation: Natural England

Reference: 150

Summary of comments

List should include PPS9 Biodiversity and Geological Conservation

Response to comments

Agreed

Summary of proposed action

Add PPS9 Biodiversity and Geological Conservation to appendix 2.

Direct Reference: Appendix 2 – Planning Context

Contact Name: Vanessa Clarke

Organisation: ECC Archaeological Branch Development Control

Reference: 120

Summary of comments

Appendix 2 should include PPG 15 Planning and the Historic Environment and PPG 16 Planning and Archaeology

Response to comments

Agreed

Summary of proposed action

Add PPG 15 Planning and the Historic Environment and PPG 16 Planning and Archaeology to appendix 2.

Direct Reference: Appendix 2 – Planning Context		
Contact Name: Stuart Rickards	Organisation: Environment Agency	Reference: 161
Summary of comments	Response to comments	Summary of proposed action
Mention should be made of PPS9 Biodiversity and Geological Conservation with a summary of its contents. Also the Essex Biodiversity Project document 'Integrating Biodiversity into Development... Realising the Benefits' could be mentioned.	Agreed. The Essex Biodiversity Project document 'Integrating Biodiversity into Development... Realising the Benefits' is mentioned in the document.	Add PPS9 Biodiversity and Geological Conservation to appendix 2. Add another reference to Essex Biodiversity Project document 'Integrating Biodiversity into Development... Realising the Benefits' on p83.
Direct Reference: Appendix 3 – Context Checklist		
Contact Name: Vanessa Clarke	Organisation: ECC Archaeological Branch Development Control	Reference: 120
Summary of comments	Response to comments	Summary of proposed action
In appendix 3 we would suggest changing Heritage assets to the Historic Environment. Sites and Monuments Record should be changed to The Historic Environment Record.	Agreed	Amend appendix 3; changing Heritage assets to the Historic Environment. Sites and Monuments Record should be changed to The Historic Environment Record.
Direct Reference: Appendix 3 - Context Checklist		
Contact Name: Frances Falconer	Organisation: Natural England	Reference: 150
Summary of comments	Response to comments	Summary of proposed action
'sites of importance' should be changed to 'sites of international, national and local importance' to ensure that all three levels of importance are considered in a Context Appraisal	Agreed	Change text in appendix 3 from 'sites of importance' to 'sites of international, national and local importance'

Direct Reference: Appendix 3 - Context Checklist		
Contact Name: C F Gibbons	Organisation: n/a	Reference: 155
Summary of comments	Response to comments	Summary of proposed action
A section on Police, Fire and Ambulance services should be included in Context Appraisal checklist Appendix 3	Agreed.	Add the services to the context checklist. P108.
Direct Reference: Appendix 4 – Context Appraisal Data Links		
Contact Name: Vanessa Clarke	Organisation: ECC Archaeological Branch Development Control	Reference: 120
Summary of comments	Response to comments	Summary of proposed action
In Appendix 4 the text 'Heritage Monument Record' needs to be changed to 'The Historic Environment Record'.	Agreed	Amend Appendix 4 'Heritage Monument Record' changed to 'The Historic Environment Record'.
An additional appendix should be added which lists all the towns included in the extensive urban survey together with the Colchester Urban Archaeological Database. (This could have links to the web site once these have been turned into PDF's).	These pdf's will be referenced once completed.	Add reference to website once information is forthcoming.
Direct Reference: Appendix 4 – Context Appraisal Data Links		
Contact Name: Blaise Gammie	Organisation: Strategic Planning Officer, Essex County Council	Reference: 131
Summary of comments	Response to comments	Summary of proposed action
Page 110 (Context Appraisal Links) the web address for Schools is invalid and appears to relate to the applications system. I suggest the	Agreed	Amend reference as suggested

following is more appropriate.
www.essexcc.gov.uk/vip8/ecc/ECCWebsite/dis/gui.jsp?channelOid=16355&guideOid=20577

Direct Reference: p111- appendix 5 spatial development types

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

Under “Requirements for all developments” include “bus stop within 400m of all dwellings”

Response to comments

Accept amendments

Summary of proposed action

Amend text, add “bus stop within 400m of all dwellings”

Direct Reference: p112- 116 appendix 6 road types

Contact Name: Emma Butler

Organisation: ECC Transportation and strategic development

Reference: 158

Summary of comments

The diagrams in appendix 6 need a total review in light of the Road Safety team’s comments (Vicky Duff).
 In addition to this H&T Strategic Development section have specific concerns regarding:

Mixed use street - Premises should be serviced from rear service yards and not on street

The junction arrangement shown in option 1 and cross roads junction should be removed as H&T do not endorse these arrangements on safety grounds.

Response to comments

All these diagrams have been superseded. The replacement drawings have been safety checked by the ECC safety audit team. Comments of which will appear along side the new road type image.

On street servicing is a viable option for deliveries. The ECC safety audit team have suggested applying set delivery hours and have not seen this as being a problem.

Drawing is superseded/changed/removed.

Summary of proposed action

Add safety audit team comments to the new road types.

No amendment required

No amendment required

No amendment required

Parking bays should be 2.5m not 2m in line with comments regarding P.36	Drawing is superseded; the new drawing has parking bays at 2.5m.	No amendment required
No Cushions on immediate approach to a crossing point, these also many not be compatible with Public Transport routes.	Drawing is superseded; the new drawing has no cushions. Raised tables have been specified to TFL standards. (Bus priority team technical advice note BP2/05)	No amendment required
No Bus stops on immediate approach to a crossing point	Drawing is superseded; bus stops are no longer next to crossing points.	Highlight the options for SERT access through the mixed use street type. Highlight the difference between strategic bus routes and bus routes.
For rapid transport services - the streets should be suitable to accommodate future light rapid transport bus services (such as SERT using 18.7m passenger transport vehicles)	The mixed use street has a design speed of 20mph or less, in this instance any rapid transport system would be unwelcome and alternative route sought.	No amendment required
We need kerbs between footway and parking areas to prevent parking on the footway (e.g. Hennef and Colchester High Street).	Drawing is superseded; kerbs are between the parking and footway areas.	No amendment required
Where on street parking places are at a premium, alternatives to on carriageway cycle parking should be considered.	Options for cycle parking must take precedent over vehicles. However the location of these must be where they will most benefit users.	No amendment required
Play street – the layout as shown in the diagram indicates there is a significant lack of parking which will cause indiscriminate parking in unsuitable areas. There are also other features which will not work within the streetscape and are likely to cause conflict.	Drawing is superseded; play streets are not for parking on. The parking bays are for unloading, visitors and maintenance only, enforceable through the management companies that maintain the developments communal areas. The road is a play street with extremely low speeds. Seating areas and sandpits are only ideas or example of what uses the play street could take on once vehicles have been reduced to low speeds.	No amendment required
Will vehicle speeds be appropriate for a play	Drawing is superseded; agreed, straight roads	No amendment required

<p>street with a straight alignment design?</p> <p>See comments for P36 and P.38. In the text on p.36 it states that trees will be located 1m for the edge of the kerb, yet the diagram at Appendix 6 shows tree pits of 1.7m x 1.7m which would not allow this to be achieved with symmetrical planting.</p>	<p>without obstacles are to be avoided for play streets.</p> <p>The text on p36 states “trees should be set back a minimum of 1.0m from the kerb line of the carriageway.”</p>	<p>No amendment required</p>
<p>Direct Reference: Appendix 7 – Ecology and Biodiversity</p>		
<p>Contact Name: AJ Morton</p> <p>Summary of comments</p>	<p>Organisation:</p> <p>Response to comments</p>	<p>Reference: 141</p> <p>Summary of proposed action</p>
<p>Essex Biodiversity Project has produced a guide “Integrating Biodiversity into Development” it is mentioned at page 80, but there is no mentioning in Appendix 7. Website is www.wildlifeandplanninginessex.org.uk</p>	<p>Agreed</p>	<p>Add extra sentence to appendix 7 that references “integrating biodiversity into the development”</p>
<p>Direct Reference: Appendix 7 – Ecology and Biodiversity</p>		
<p>Contact Name: Frances Falconer</p> <p>Summary of comments</p>	<p>Organisation: Natural England</p> <p>Response to comments</p>	<p>Reference: 150</p> <p>Summary of proposed action</p>
<p>Brownfield land may also support important flora species and communities and protected species which may not always be picked up from the identified sources. These other issues should be addressed by carrying out wider data searches and survey as appropriate.</p>	<p>Agreed</p>	<p>Add note to appendix 7 to address “carrying out wider data search and survey as appropriate”.</p>
<p>Direct Reference: UPS Strategic Environmental Assessment (SEA) and</p>		

sustainability Appraisal Objective 6

Contact Name: Zhanine Oates ECC Senior Planner**Organisation:** Essex County Council**Reference:**

Summary of comments**Response to comments****Summary of proposed action**

6) New development not to increase flooding or river pollution

APP3- It is recommended that this policy seeks to outline appropriate design measures that may be adopted to mitigate against flooding.

APP4- It is recommended that the UPS seeks to outline some possible flood mitigation measures that may be adopted, particularly for related to development within centre of built up areas which are more likely to be located within the floodplain.

APP6- The policy should seek to encourage additional landscape features within the residential environment that will reduce the likely occurrence of flooding in residential environments.

APP7- It is recommended that this policy outlines the relevant flood mitigation measures deemed appropriate for car parking.

APP11- Design criteria for development on the floodplain at high density would enhance the delivery of the UPS.

APP12- It is recommended that new development should seek to take into consideration the suitability of the land for development with regards to flooding.

The UPS stipulates the requirement for reducing flooding and river pollution; these include green roofs, rain water collection and recycling and Sustainable Urban Drainage Systems all of which help to reduce runoff.

The Environment Agency has specified an interest in endorsing the document. Amendments to the document specifying the restrictions on underground car parking in flood areas will be included within the final version.

Wet habitat planning (as part of the green points system), SUDS, green roofs and rain water recycling all help to reduce run off and the impact this has on flooding in urban areas.

Underground parking in flood areas should be used carefully where there is a likelihood of flooding.

See pages 77-79

Amend text to detail the requirements for car parking within flood plain areas. Underground car parking is not to be encouraged in these areas.

See pages 77-83

Amend text to detail the requirements for car parking within flood plain areas. Underground car parking is not to be encouraged in these areas.