

Consultation Report - Representations in document order with Outcomes

Total representations for draft (in this report) = 10

Adoption Statement for the Urban Place Supplement

ID / Name	ID / Type	Representation	Outcome
472 LUCINDA BUTCHER (ESSEX WILDLIFE TRUST)	598 Support	Essex Wildlife Trust supports this additional design guidance to the Essex Design Guide for Residential areas. The requirement for "new development to incorporate sustainability measures by introducing renewable energy techniques in all developments, and ensuring that biodiversity and water conservation measures are incorporated in the design of buildings, streets and open spaces" (reference Draft 1:Adoption Statement for the Urban Place Supplement page 4 1.7) is welcomed by the Trust. LDF Consultation response 30 01 08 (Essex wildlife Trust).doc	No amendment made in respect of this representation as it indicates support.
346 Ms NATALIE BLAKEN (EEDA)	619 Object	EEDA is committed to the provision of high quality places to live, work and visit through the implementation of the Regional Economic Strategy. RES Goals 4 and 8 identify the importance of design quality and sustainable principles in the delivery of successful new development in the region. EEDA welcomes the adoption of this additional design guidance and in particular the reference to specific sustainability standards including Eco Homes, BREEAM and renewable energy targets. Adoption statement for the Urban place supplement (vh).doc	No amendment made in respect of this representation as it indicates support.
445 Mr Roy Lewis (Essex County Council)	629 Support	The content and proposals of the documents are welcomed and supported. The approach taken by the document fits with that being followed by Essex County Council. CPT Urban Place Supp Adopt State ECC Response (Roy lewis).doc	No amendment made in respect of this representation as it indicates support.
93 Mr CHRIS SHAW (HIGHWAYS AGENCY)	656 Support	The HA is supportive in principle of the adoption of the Urban Place Supplement (UPS) as a Supplementary Planning Document by Castle Point Borough Council that will help to ensure that development opportunities in urban centres are maximised through provision of mixed use development. As stated in our response to the Core Strategy in November 2006 (Preferred Options), the HA would support the creation of a balanced strategy that takes both housing and employment into account to create sustainable communities. URBAN PLACE SUPPLEMENT (CHRIS SHAW).tif	No amendment made in respect of this representation as it indicates support.

Chapter 1 The Urban Places Supplement (UPS)

ID / Name	ID / Type	Representation	Outcome
56 Mr PAUL	722 Observations	The HBF has been made aware of the existence of the above consultation document by a couple of the local authorities in Essex. It regrets that despite earlier written and verbal requests made since the	No specific amendments made to the adoption

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CRONK (HBF REGIONAL PLANNER (EASTERN REGION))		<p>publication last year of the previous version of the draft document, the County Council has not yet taken up our request for a meeting to discuss the document 's content further. It also feels that a 4 week consultation period for a document with such wide ranging implications is inadequate.</p> <p>In the light of the planning system now requiring additional public consultation and the involvement of the private sector in the production of the evidence base to inform policy the process should have been more inclusive from the start. Hopefully the comments from the private sector will be taken on board prior to the adoption of the final version of the document.</p> <p>In relation to the specific content of the document the HBF would like to make the following points:</p> <p>Document Status</p> <p>It is unclear as to who exactly has been involved in its formulation, particularly in terms of stakeholder involvement by the development industry. The document would appear to have been put together entirely from a local authority perspective without any regard to the likely associated costs involved, or the impact that the document would have on housing delivery (particularly in the context of the national Growth Areas agenda).</p> <p>The whole purpose of Supplementary Planning Documents is to amplify and expand upon the content of saved policies in an Adopted Local Plan or Structure Plan. Therefore, it's content has to fully accord with the specific policies in the Plan to which it relates. The document has to clearly show in full the individual adopted policies to which its content relates. This needs to be done in order for local authorities to adopt the document. Furthermore, they can only seek to adopt the document as a SPD (Supplementary Planning Document) if it has been listed in their adopted LDS (Local Development Scheme).</p> <p>The proposed document is seeking to fundamentally change planning policies rather than supplement them (as the County Council claims), and will bring with it major new costs. It is clearly inappropriate for such policy changes to be introduced via SPD, when instead they ought to be introduced either nationally or through the DPD system where they can be subjected to an appropriate level of public scrutiny.</p> <p>Please find a copy of a letter attached dated 19th November 2004 from GOEM to Northampton Borough Council stating the appropriate procedure and role of SPD documents under the new planning system. It makes it quite clear that in order to comply with the new legislation any proposed SPD needs to have been first identified within a Local Development Scheme. It will then have to be prepared alongside a Sustainability Appraisal, and where necessary, a Strategic Environmental Assessment as well.</p> <p>A further copy of a letter dated 8 September 2006 from GO-East is attached in relation to the Cambridge City LDS. It states that: '...If the intention of any non-statutory planning guidance note is to help applicants understand the practical application of policy then clearly this may be helpful. However, where such guidance goes beyond this approach and starts including requirements or prescription that go</p>	<p>statement in respect of this representation as it is focused on criticising the County Council and the UPS rather than the adoption statement.</p>

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		<p>beyond the scope of the relevant plan policy, and so seeks to alter the policy, then clearly this would be inappropriate. The same principles apply to SPD...’.</p> <p>The comments immediately above are considered highly pertinent as the draft document is in many cases introducing new requirements (some of which are contrary to individual local authority adopted local plan policies), and being highly prescriptive and inflexible. For instance, section 2. Scope states that: ‘...For the first time, the guidance proposes minimum and maximum housing densities relative to the location of any site within its urban context...’. This is not based upon adopted local plan policies, indeed it is contrary to some of them.</p> <p>Given that the County Council is no longer responsible for preparing countywide planning documents under the new planning system the document does not form part of the County Council’s Local Development Scheme, and that therefore under new planning legislation the Authority has no legal powers under which it could adopt this draft document as Supplementary Planning Guidance or as a SPD.</p> <p>Consequently, it would be very misleading to suggest that local authorities can just eventually adopt the document themselves as SPD when under planning legislation they cannot do so unless they have each followed the aforementioned planning procedure in compliance with PPS12.</p> <p>Alternatively, Councils can produce Interim Policy guidance, which expresses their position on a subject matter, but will obviously only have the very limited weight of a document of such status.</p> <p>However, the Federation considers that any such document (regardless of its status) should not include content more appropriately covered by other things that have, or are happening nationally. These include various Government initiatives relating to the Sustainable Communities including the Code for Sustainable Homes.</p> <p>The HBF is concerned that the document clearly has not been subject to a rigorous Sustainability Appraisal. It is of particular concern that the financial impact of the proposals is only now being looked at within a financial appraisal, which the County Council awaits, even though public consultation on the document is already underway.</p> <p>The Federation is concerned that given the inflexible nature of some of the proposals, and their potentially very high costs, the document could be used as a means of stopping, rather than enabling, new housing development in the county.</p> <p>It is interesting that the need for design flexibility has been very recently acknowledged by one Essex Local Authority. The Southend on Sea Submission Core Strategy DPD (August 2006) states in paragraph 6.21 that: Detailed guidance in relation to these matters is provided in the Southend Design and Townscape Guide SPD. Southend Borough Council recognises that good urban design requires a</p>	

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		<p>'partnership' approach between the planning authority and applicants for the benefit of the physical and built environment, the public and the local economy. This design guidance does not, therefore, prescribe specific solutions or set rigid or empirical design standards, but instead indicates options which emphasise and illustrate design objectives or principles....'. The HBF fully supports such a partnership approach that offers flexibility, rather than the rigid and overly prescriptive approach currently being promoted within the Urban Place Supplement.</p> <p>Specific matters:</p> <p>2. Scope</p> <p>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....'.</p> <p>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....'.</p> <p>It is then says that '...Not all of the provisions are able to be adopted as supplementary planning guidance at this point in time...'. </p> <p>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.</p> <p>3. How to use this document</p> <p>It is stated that ' ..Importantly, this work (Context appraisal) should be 'signed-off' by the local planning authority, other agencies and the community prior to the submission of any planning application. Following this process is required for either Outline or Full planning applications and is also recommended for the production of site development briefs, development frameworks and area masterplans...'. 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?</p> <p>4. Urban context</p> <p>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.</p> <p>The context appraisals seem overly burdensome in terms of information requirements. Furthermore, the</p>	

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		<p>HBF disagrees with the statement that '... the exercise will inevitably suggest a suitable range of uses, housing tenure and green space needs and should be used as a baseline to inform the right development approach for a site from which to begin initial design work..'. The Federation considers that matters of housing tenure ought to primarily be flagged up within Housing Market Assessments. The document seems to lack any proper regard to commercial and financial considerations pertinent to potential development sites uses.</p> <p>P. 13 - Diagram 3</p> <p>The HBF opposes the rigid and inflexible requirements set out in the diagram, and the text at the bottom of the preceding page which states that: 'before proceeding, these definitions of spatial context need to be compared against a site proposed for development and the applicability of this definition agreed in writing with the local planning authority at the start of the Context Appraisal process. This is important as the permitted minimum density and development characteristics are established by this method'.</p> <p>This is largely a series of matters for local authorities to address through their DPD's and SPD's. There is no need to repeat the whole process again.</p> <p>P.'s 17 & 42</p> <p>It is highly unlikely that applicants would wish to map commercially sensitive information such as property and rental values as suggested.</p> <p>The Federation does not consider that the document provides a clear picture of the precise purpose and role of Context Appraisals in terms of the submission of planning applications for residential development.</p> <p>P.18</p> <p>It is stated that further information on what a Site Appraisal should contain can be found in the Essex Design Guide and on the Essex Design Initiative web site. With regard to the latter, the HBF is concerned that the web site could be used as a means of introducing new requirements.</p> <p>P.'s 19 & 22</p> <p>Whilst Appraisals might well highlight support for particular elements and uses that could be included in any planning application, any Planning Obligation Agreement must fully reflect the economics of development, and accord with Circular 5/05.</p> <p>P.20</p> <p>It is stated that the guidance introduces new priorities for place making. Again this is another example of</p>	

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		<p>the document amending rather than supplementing policy.</p> <p>It goes on to say that: 'All residential and mixed-use development shall be planned and designed by professional architects working alongside urban designers, landscape architects, ecologists, engineers, commercial surveyors, BREEAM assessors and the community'. It is unclear whether this is an actual requirement, or where the justification for this in adopted policy is. It seems financially unfeasible that such an approach would apply right down to single dwelling developments.</p> <p>P.23</p> <p>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. Again this is another example of the document amending rather than supplementing policy, taking no account of Local Plan policies or site circumstances.</p> <p>Nor does the HBF agree with the statement that '...the degree to which a location can support non-residential uses will be informed solely by the outcome of the Context Appraisal for specific sites and its proximity to a major street...'. Again, this is a further example of the Council's inflexible approach and complete lack of regard to the financial viability of development.</p> <p>With regard to Public Space it is stated that a new requirement in this guidance is that public space should be designed to accommodate biodiversity. It is stated that '...The Context Appraisal process makes it unnecessary to require an arbitrary amount of green space for every home or for every development as planning policies requiring this rarely take into account the extent of existing green space already serving an area. The result can be an 'oversupply' of green areas that are grossly underused that places pressure on the already, overstretched ground maintenance budgets of local authorities. The requirement therefore is to provide green space that meets the needs of the community and, if necessary, contributes to the improvement of the surrounding facilities...'. </p> <p>We are again seeing adopted plan policies being amended or replaced by the content of this document.</p> <p>P.34</p> <p>The text seems to suggest that local authorities may be unwilling to take on board site management and maintenance costs. Paragraph B19 of Circular 5/05 states that "as a general rule, however, where an asset is intended for wider public use, the costs of subsequent maintenance and other recurrent expenditure associated with the developer's contribution should normally be borne by the body or authority in which the asset is to be vested. Where contributions to the initial support ("pump priming") of new facilities are necessary, these should reflect the time lag between the provision of the new facility and its inclusion in public sector funding streams, or its ability to recover its own costs in the case of privately-run bus services, for example. Pump priming maintenance payments should be time-limited and</p>	

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		<p>not be required in perpetuity in planning obligations".</p> <p>P.36 & Appendix 5</p> <p>It is stated that '..In every development project or sites over 0.1ha or 10 dwellings the inclusion of artists and artworks will be required. It is recommended that up to 1% of the total development costs (including fees but excluding the cost of borrowing) is allocated for art...'. Again this replaces adopted plan policies which encourage art encourage art provision, usually only in major developments (not on small-scale development sites).</p> <p>The wording of policies which involve the incorporation/contribution of art into potential developments are often excessive, inflexible and go beyond the remit of Town and Country Planning. It is widely recognised that developers are expected to contribute towards all manner of essential physical and social infrastructure necessary, in land use planning terms, to serve their developments. As such it is clear that the provision of, or contribution towards public art cannot be considered a proper function of planning control, as was recognised by the leading counsel when addressing the Arts Council. The Arts Council Steering Group report recognised this. The Steering Group's own recommended form of policy wording was for authorities, in appropriate cases to seek to encourage the provision of works of art as part of schemes for development. The report recognised that the under planning legislation it was not possible for the planning system to make the provision of public art a mandatory requirement.</p> <p>Therefore, policies must make it clear that Councils will seek to negotiate with developers for the provision of, or contributions towards public art, where appropriate, rather than requiring it in all circumstances.</p> <p>P.'s 41, 67 – 70 & Appendix 5</p> <p>National density requirements have been set out in planning policy guidance. These should then be expressed at the local level through Development Plan documents to reflect local circumstances. Essex is an extremely diverse county in character, it would therefore clearly be inappropriate to set a countywide density figure for that reason alone.</p> <p>The proposed high-density requirements are likely to be unrealistic and unachievable in many instances. The majority of potential new home purchasers are unlikely to find the idea of no gardens at all, or heavily restricted garden spaces, acceptable. This will be a particularly strong deterrent obviously for family purchasers, and could easily result in a complete failure to deliver mixed and balanced communities as a result.</p> <p>It is stated that '...at densities above 50 dph an outside space of at least 25 sq would be required for all homes. This shall primarily be provided as shared community gardens'. It then says 'for the time being, some local authorities may have different standards and applicants should consult the relevant District</p>	

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		<p>Council for details of the specific policy'. This clearly shows the confusion likely for applicants given that this document is seeking to rewrite adopted planning policies, and that different requirements would operate in different districts of the county.</p> <p>P.42</p> <p>This introduces unduly rigid new design criteria for private communal space</p> <p>P.'s 44 – 48, 67 – 68 & Appendix 5</p> <p>It is stated that if current parking standards for Essex are applied on schemes greater than 50dph public space is severely compromised. Either parking provision is substantially reduced or alternatively all schemes over 50 dwellings per hectare to have underground, under deck, multi-storey or under-croft parking.</p> <p>This is likely to be extremely expensive to implement, as would the requirement for the provision of lifts. Furthermore, the removal of very large amounts of soil will require significant additional lorry movements. This would not be sustainable. Technical considerations and site-specific abnormalities will also have an impact on the achievability of such a limiting design solution. Furthermore, it would seemingly present very serious crime and safety issues, which would be likely to deter many potential home purchasers. Whilst underground parking will be appropriate in some circumstances, the document must be far more flexible in relation to this matter.</p> <p>No evidence appears to have been put forward to substantiate the requirement for 5% of parking spaces to be for disabled people.</p> <p>P.48</p> <p>The document refers to the minimum cycle parking standards set out in 'Vehicle Parking Standards for Essex' and says that they are inadequate. It introduces a new requirement for additional short stay cycle parking wherever this may be considered necessary. It is further stated that developers may be asked to contribute to the provision of cycle stands at important locations within the immediate area. The HBF opposes any additional cycle parking requirements above those already set out in adopted standards, or not directly related to individual developments.</p> <p>P.59</p> <p>The lifetime homes standard has no status as far as town and country planning legislation is concerned. PPS1: Delivering Sustainable Development states in paragraph 30 that "...planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements, such as those set out in Building Regulations for energy efficiency". PPS12: Local Development</p>	

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		<p>Frameworks states in paragraph 1.8 that "...planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements...".</p> <p>The HBF considers that this is largely a matter already dealt with by way of Part M of the building regulations. Developers must, as a matter of law comply with the Building Regulations and they are subject to frequent change and update unlike local plans. The purpose of these references in the two Planning Policy Statements is to avoid confusion and potentially conflicting advice being given by different regulating authorities.</p> <p>Thus whilst it may be appropriate for planning authorities to seek to negotiate with developers for a proportion of dwellings to be built to lifetime homes standards, it is considered excessive and unwarranted to require all dwellings to be built to such standards. Indeed, to do so would inevitably result in the achievement of lower overall densities.</p> <p>I would draw your attention to an appeal decision concerning a reference to the provision of lifetime homes on land at former RAF Quedgeley, Gloucester. In paragraph 27 of the decision notice (see attached copy) the Secretary of State said that "it is not appropriate to include this matter, for the reason that the internal layout of buildings is not normally material to the consideration of planning permission. PPG3 gives advice about the assessment of need for housing for specific groups including the elderly and disabled".</p> <p>P.'s 67 – 73, 78 & Appendix 5</p> <p>It is inappropriate to refer to a new requirement for all dwellings to achieve an Eco Home/BREEAM Very Good - Excellent sustainability standard.</p> <p>The specification of current Eco Homes standards will time limit the document and restrict future innovation, particularly when 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.</p> <p>Consequently, these matters will now be dealt with by means others than those specified within the County's draft document.</p> <p>P.'s 78 – 79 & Appendix 5</p> <p>The HBF and its member companies are keen supporters of the concept of SUDS and seek to implement them wherever this is practicable. However the implementation of SUDS and their adoption are processes which involve separate bodies and consequently this is where the problem arises.</p> <p>Most Planning Authorities require the integration of SUDS into developments, however it is the adoption</p>	

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		<p>which is controlled under Building Regulations (and/or other relevant Construction/Public Health legislation).</p> <p>If the Planning Authority imposes conditions which require developers to provide SUDS, and Local Building Control, Highway Authority and or the Water Company are reluctant to adopt SUDS, it is clear that this will leave developers in a situation where although Planning requirements have been satisfied, the SUDS will not be adopted by water companies and local authorities.</p> <p>In view to the practical problem it is clear that to require provisions in all circumstances would frustrate development. Developers should not be expected to deal with the long-term management and administration systems involved in the successful operation of SUDS. Until such a time as a suitable mechanism for dealing with the adoption of SUDS schemes is established policies should either;</p> <ul style="list-style-type: none"> (i) "encourage" the use of SUDS; or (ii) "seek the implementation of sustainable drainage systems wherever practicable" <p>rather than require in all circumstances.</p> <p>As such the HBF consider Authorities planning systems should promote better communication channels, and early communication and liaison between all parties to aid the incorporation of SUDS. Any guidance issued should encourage the use of SUDS but should not impose the use of SUDS until such time as other stakeholders, especially those agencies who will be responsible for their long-term maintenance, accept them. Furthermore, many Authorities already have adopted planning policies encouraging (rather than requiring) SUDS to which this draft document will need to comply.</p> <p>P.'s 82 – 85</p> <p>The Green Point System is considered to be too subjective and deals only in generalities without any consideration of baseline data. It introduces a new requirement for developments to score at least 1000 points per hectare. 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.</p> <p>Appendix 2</p> <p>The Appendix supposedly sets out the planning context for the document. However, all that is listed are very brief summaries of national Planning Policy Statements, and the draft Regional Spatial Strategy.</p> <p>The draft document completely fails to link its policies and guidance with any specific adopted planning policies. The HBF considers that without such linkage the Essex Urban Place Supplement has not been</p>	

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		<p>produced in accordance with national planning requirements, and accordingly it is therefore incapable in its present form of being adopted as a Supplementary Planning Document.</p> <p>Appendix 5</p> <p>Not all developments over 1000m² or 10 dwellings in size are likely to be able to incorporate infrastructure for renewable heat and power generation so as to provide at least 10% of their predicted energy requirements. There is little guidance on how such usage will be measured thus rendering the target meaningless.</p> <p>Whereas the requirement that all large urban infill and sustainable urban extension development sites shall incorporate a Combined Heat and Power System in order to supply 100% needs of the development is likely to be prohibitively expensive both in terms of initial construction costs, but also ongoing maintenance liabilities.</p> <p>URBAN PLACE SUPPLEMENT (PAUL CRONK HBF).doc</p>	

Chapter 3 Sections of the UPS to be Adopted in support of the Adopted Local Plan

Item	ID / Name	ID / Type	Representation	Outcome
Statements of Intent LP 2 Movement	93 Mr CHRIS SHAW (HIGHWAYS AGENCY)	658 Observations	<p>The HA welcomes Statement of Intent CS6, which specifies that there will be a "presumption in favour of development close to existing services and facilities or in the public transport corridor". However it is noted that this approach is not adopted in Statement of Intent LP2. In order to maximise sustainability during the interim period prior to the adoption of the Core Strategy, the HA recommends that the above statement should be included in LP2. Whilst not strictly in line with the saved policies in the Local Plan, this approach is in line with the objectives of PPG13 and consideration should be given to adopting this as soon as possible, prior to adoption of Core Strategy.</p> <p>URBAN PLACE SUPPLEMENT (CHRIS SHAW).tif</p>	LP2 amended to include those aspects of CS6 considered desirable.

Chapter 4 Sections of the UPS to be Adopted upon Adoption of the Core Strategy

Item	ID / Name	ID / Type	Representation	Outcome
Statements of Intent CS 1 Context Appraisal	93 Mr CHRIS SHAW (HIGHWAYS)	657 Support	<p>The HA is supportive of Statements of Intent LP1 and CS1 which promote the introduction of a context appraisal for sites over 0.4ha. It is the view of the HA that this will help to ensure that land uses and densities in sustainable locations are optimised, in line with Policy DC3 of the Core Strategy (Preferred Options Report, August 2007).</p>	No amendment made in respect of this representation as it indicates support.

Item	ID / Name	ID / Type	Representation	Outcome
	AGENCY)		URBAN PLACE SUPPLEMENT (CHRIS SHAW).tif	
Item	ID / Name	ID / Type	Representation	Outcome
Statements of Intent CS 7 Mixed Uses	93 Mr CHRIS SHAW (HIGHWAYS AGENCY)	659 Support	<p>The HA is supportive of the proposed mixed use strategy which seeks to produce a broad balance at the strategic level between employment and housing. It is the view of the HA that mixed use development should be promoted primarily in locations with good access to public transport, in line with paragraph 30 of PPG13, in order to reduce the need to travel.</p> <p>URBAN PLACE SUPPLEMENT (CHRIS SHAW).tif</p>	No amendment made in respect of this representation as it indicates support.
Item	ID / Name	ID / Type	Representation	Outcome
Statements of Intent CS 9 Design Criteria for Accommodating the Car	93 Mr CHRIS SHAW (HIGHWAYS AGENCY)	660 Observations	<p>It is noted that Statement of Intent CS9 includes a range of car parking solutions for developments in town centre locations. As stated in November 2006 in our response to policy TP3 of the Core Strategy Preferred Options DPD, it is recommended that parking should be provided in line with maximum standards or preferably lower, in conjunction with Travel Plan measures. It is therefore recommended that the Urban Place Supplement should indicate that consideration should also be given to reducing parking allocations in situations in which accommodation of parking is difficult.</p> <p>URBAN PLACE SUPPLEMENT (CHRIS SHAW).tif</p>	No amendment made in respect of this representation as it is a design document and not a strategic document or car parking standards document.
Item	ID / Name	ID / Type	Representation	Outcome
Statements of Intent CS 10 Cycle Facilities	93 Mr CHRIS SHAW (HIGHWAYS AGENCY)	661 Support	<p>The HA supports the use of sustainable modes of travel and is supportive of sustainable transport initiatives which encourage use of modes other than the private car. The HA therefore welcomes the guidance set out in the UPS regarding cycle facilities close to home and at destinations. The HA would also welcome the development of a cycle network for the borough, and therefore supports proposals that developers should identify opportunities to add new or improve existing cycle routes through the context appraisal, as stated on page 48 of the Essex Design Guide Urban Place Supplement. In order to provide clear guidance to developers it is recommended that the Context Appraisal section of the Urban Place Supplement should also specify this requirement.</p> <p>URBAN PLACE SUPPLEMENT (CHRIS SHAW).tif</p>	No amendment made in respect of this representation as it seeks amendments to the UPS, which is not possible.