

Dear Howard

Planning Policy Working Group

I'm writing to you ahead of this evening's PPWG meeting as Jo Parry and I are getting increasingly concerned that the minutes of the PPWG meetings consistently fail to record the concerns that we raise during the meetings, and this is the case again with the draft minutes of the 23 March 2016 meeting.

I am writing now rather than simply raising the various omissions during the meeting as I should like this letter formally recorded and attached to the minutes of today's meeting. Obviously I should also like to see the draft minutes amended to reflect the items I raise below.

I have also attached a letter from the A1307 Parishes Forum which seems relevant to agenda item 8.

My particular concerns about the minutes are:

- Jo and I have regularly raised concerns about the Employment Land Review and the Highways reports. In particular, the ELR terms of reference appear to us to be fundamentally flawed as the ELR Tender requested that the ELR be prepared on the basis of the previous employment strategy, contained in the rejected Local Plan, which was predicated on the basis of the then proposed dispersed housing strategy. The ELR therefore assumes a dispersed strategy, which is clearly an inappropriate assumption. Similarly, the Highways Report last time looked purely at individual sites and how transport impacts could be mitigated; it contained no strategy, no overall assessment of the issues facing Uttlesford and how UDC can best comply with its NPPF obligations, and no comparative assessments. The terms of reference for the current Highways Report indicate that these issues are not going to be addressed this time either;
- Clearly these concerns relate both to the fact that the minutes do not reflect the concerns that we are raising as well as the fact that the concerns we are raising are not being dealt with;
- Minute PP56 on item PP44 refers to our request for formal guidelines but then completely ignores the outcome;
- In relation to CIL, we raise this issue at every meeting, and are repeatedly told that work on CIL won't progress until a spatial strategy has been decided. We don't accept that this is correct. The CIL should be worked up in parallel with the spatial strategy – which is what the NPPF requires – and tested against it. Obviously the extent of new infrastructure and the amount of the CIL should be integral to the spatial strategy. UDC appears to have a marked antipathy to CIL, and we are very concerned that it is not being properly looked at or considered. Recent documents produced by UDC such as the draft Saffron Walden Air Quality Action Plan completely ignore potential future CIL contributions and instead focus purely on potential future s.106 contributions. As you are aware, we are extremely frustrated at the amount of infrastructure which Uttlesford has lost because of the current s.106 and developer contributions policy, and we would hate to see this continuing. You will also be aware that there appeared to be no CIL consideration as part of the rejected Local Plan. The position is of course even worse with the recent Government restrictions on s.106 pooling. This concerns is again both that the issue is not being properly addressed and that the minutes do not reflect the issues raised;

- We have repeatedly raised our concerns that the numbers in the Issues and Options consultation were completely wrong – the base housing requirement should have been 5000 new homes not 3000 to be found. This error has been confirmed, but no explanation as to how it arose or whether it invalidates the consultation. The only answer has been that the high case in the consultation covers the base case, but this is hardly a good answer. We are very concerned that such a fundamental error has completely invalidated the consultation. Again, the minutes are silent on the concerns we have raised;
- On the Duty to Co-operate, we have repeatedly expressed concerns about the lack of co-operation with Cambs and South Cambs, and are repeatedly told that Cllr S Barker is in regular contact, but no details are ever given. Again, we raised this concern at the 23 March meeting, but the minutes are silent on it;
- In relation to minute PP69, we raised two issues on the Dunmow Local Plan, and asked that of the 4 issues that UDC was proposing to object on, 2 be withdrawn. The first was the objection on Dunmow failing to fulfil completely the affordable housing need on the basis that Uttlesford itself will fail to do so, and that the Local Plan inspector confirmed that he was happy with this in the Plan Examination. The second is UDC's proposed objection to Dunmow's sports strategy, which we asked to be withdrawn. As you know, we are very concerned about UDC's lack of sports infrastructure provision and the lack of requirement of developers, and UDC would do well to follow Dunmow's lead. I won't repeat the arguments, but at the 23 March meeting we specifically raised these concerns and it was agreed that these objections would be withdrawn, yet the minutes say something very different on the first point and completely ignore the second point;
- Draft minute PP73 refers very briefly to the still missing Forward Plan, but completely ignores the issues we raised. Again, we would like these properly minuted. I believe that the concern at the lack of a Forward Plan is much wider than just Jo's and mine.

John Lodge