



<b>Committee</b>	Full Council
<b>Month</b>	December 2023
<b>Report Title</b>	Uttlesford Local Plan Regulation 18
<b>Report Author</b>	Georgia Arnold Deputy Town Clerk
<b>Attachments</b>	Working Groups draft SWTC consultation response to the Uttlesford Local Plan Reg18

**Agenda item: 10**

**Summary**

At the September Council meeting it was noted Uttlesford District Council is launching its Regulation 18 consultation of the draft Local Plan. The following was resolved (min ref FC 143-23).

*Council Resolved: To appoint a working group formed with Cllrs Gadd, Freeman, Reeve, McBirnie and Curtis with officers to draft a response from SWTC which will be presented to Council.*

The attached therefore is the draft response prepared by the working group for Council consideration.

**Recommendation**

Council is asked to consider the attached response and it is recommended this is adopted by Council for submission to the consultation (closing 5pm Monday 18 December).

The below response is Saffron Walden Town Council's corporate response to the Uttlesford District Council draft regulation 18 Local Plan as agreed at the Full Council meeting held on xxxxxxxx.

You will see the response is formatted to correspond with the plan chapters, referring to each page and/or paragraph number as appropriate - the comments made include both SWTC opinions, grammatical errors and /or where clarity is sought.

Our comments regarding the plan generally are as follows:

- The draft policies set out good principles for development, but most can be strengthened to avoid misinterpretation or confusion, for example:
  - For example, core policy 21 states "rural diversification **shall** normally be permitted providing that... i-v".  
This could be misinterpreted and only one of the five items might be met, to avoid confusion a line must be added to state Development will only be permitted if it meets **all** the criteria. This approach replicates that of the 2005 UDC Local Plan for example 2005 ULP Policy GEN1 specifically states **all** criteria must be met – this sets a clear expectation of what is required.
  - Likewise, the draft plan, development policy 3 states "applications **should** be accompanied by evidence of i-vii..." this policy again could be misinterpreted and only some requirements are met.  
The statement must be reworded to specify applications **MUST** be accompanied by evidence, this again replicates the approach in the 2005 ULP which specifically states requirements, for example 2005 ULP Policy GEN 2 states development will not be permitted unless...
- The draft plan includes no proposals for childcare or early years provision in Uttlesford, both must be included within the plans policies and land allocations.
- Additionally, the plan provides provision for a three-form entry school in Saffron Walden, but the location is not specified. It is unclear whether the three-form entry school is in addition to the designated education land at the Radwinter Road sites (Linden Homes and Redrow) – this needs to be clarified. Essex Country Council is due to exercise the option to use the Radwinter Road sites, but this has not yet happened, should this not happen the plan could include reference to alternate uses of this land.
- Whilst the sporting provision policies will come forward at regulation 19, the plan has little to no reference to sports halls, clubs and/or provision for the district. Please therefore include full land allocations for the maximum justifiable provision for the demand created by the Plan development, and also if possible proposals for addressing the existing deficit and ideally the wished for Sports Hub.
- Similarly, there is little reference to recreational facilities for the district, those existing and how they must be protected or future provision.
- The plan refers to Design Guides and it is not clear where this is referring to the Uttlesford or Essex Design Guides, the plan should be clear with references throughout.

**Chapter One Introduction**

Page	ULP Paragraph	SWTC comment	Proposed Change
4	1.3 <i>“identified through detailed evidence being gathered or from previous stages of consultation”</i>	This suggests that the evidence is either not yet there (it is being gathered) or may be out of date if based on previous iterations of the local plan process	Evidence should be robust and up to date. It should be available now at this Reg 18 stage and where reliant on historic data, this data should be reviewed and renewed to ensure it is fully representative of the facts in 2023
5	1.7 Community stakeholder forum	This community stakeholder forum was in 2020, concluding in 2021. Is there not a need to revisit this information and to fully reconsult and follow the 2020/21 template? Much has changed since the last consultation including: (a) Consultation was held during covid period, therefore uptake may have been less or skewed as people focused on different things (b) Economic environment has changed considerably since this time (c) New residents in larger towns, especially SW (d) How we work has changed which may alter comments or responses to matters around transport, local economy, and leisure	There is a strong argument for re-running the full series of community stakeholder forums from 2020 to ensure the community feedback is as up to date as possible
7	1.18 diagram of the statutory development plan	Showing the local plan, NP and minerals/local plan on the same level in the table, suggests that each has equal weight in planning hierarchy but that is not the case. NPs (for example) sit at the bottom of the planning hierarchy and must be in conformity with plans/policies above it.	The table is misleading and should be replaced with one more representative of the hierarchical nature of planning process
10	1.33 Habitats Regulation	Would be helpful to have a link to the quoted regulations	Add footnote links to the document  The plan is inconsistent in providing footnotes for some statements and others not.

## Chapter Two Spatial Portrait

Page	ULP Paragraph	SWTC comment	Proposed Change
11	2.4 – comments about rapid growth, 320,000 new homes and 165,000 new jobs... Planned over next 15 years.	The source of this information should be referenced for soundness and credibility	Add footnote links to document
13	2.5 & 2.6 reference to the SELEP and LEP	How do the policies of these impact on the local plan?	More information required on the policies and strategic development plans in SELEP and LEP
15	2.16 to 2023 references a number of statistics	The footnotes are given at the end of the page (footnote Nos 15,16 and 17 refer) but these cannot be seen in the text above it	Amend footnotes to include the reference in the body of the text
15	2.21 – states population of Saffron Walden as 17,018 – this information conflicts with other reports	The population in this document is contrary to that shown in the Open Space Update report by Knight, Kavanagh and Page which shows SW population as 14,970. It is likely the Open Space report is incorrect – does this therefore mean their calculations on open space, community facilities etc has been incorrectly calculated if using out of date population figures?	Reconcile query. Amend population figures in the Open Space report which may require projections in this report to be re-run
16	Key Opportunities	A key opportunity could also include the provision of specific housing opportunities for young people. Whilst commendable to include specialist housing for older people, this simply exacerbates the influx of older people to the large settlements. There are few housing opportunities for young people in Uttlesford but other towns/cities provide specific opportunities. See Your Housing Group: <a href="https://www.yourhousinggroup.co.uk/im-looking-for-a-home/supported-housing-for-young-people/">https://www.yourhousinggroup.co.uk/im-looking-for-a-home/supported-housing-for-young-people/</a>	Consider the opportunity of providing specific housing for young people to support the retention of young people to the area
18	2.24 – advises the chalk streams are shown in figure 2.2	Figure 2.2 does not show chalk streams	Amend / insert figure as appropriate
22	2.38 “In 2019 Public Health England conducted a report into the health profile of Uttlesford”	It would be helpful to have a link to this report and to see how challenges in this report are addressed in the local plan	Add details of the Public Health England report

Page	ULP Paragraph	SWTC comment	Proposed Change
22	2.398 – quotes the number of secondary and primary schools in the district	The reference to this information is Snobe (2023) but a more credible and accurate source would be from Essex County Council	Check details from Snobe are correct and amend reference source to ECC
23	2.40 “there are many non-listed buildings and structures that are locally significant .....	In recognising the importance of these local non-listed buildings, UDC should support the protection of these through an article four direction	To actively promote and support the use of an article four direction
23	2.41 and 2.42	It is appropriate to also reference the number of listed buildings and conservation area in Saffron Walden	Add specific reference to Saffron Walden in this section

### Chapter Three Spatial Vision and Strategic Objectives

Page	ULP Paragraph	SWTC comment	Proposed Change
		<p>General comment on chapter 3</p> <p>Very few references to neighbourhood plans, chapter 3 repeatedly refers to minimizing the effect of developments on its surroundings, this must comply with neighbourhood plans</p>	<p>3.3 could read</p> <p><i>These central themes are consistent with the governments objectives AND will consider local neighbourhood plans when responding to applications</i></p>

### Chapter Four Spatial Strategy

Page	ULP Paragraph	SWTC comment	Proposed Change
30	North Uttlesford – including Gt Chesterford .... And Saffron Walden	There is no reference here to the historic importance of Saffron Walden and this should be included. In the section below North Uttlesford, specific reference is given to the <i>“historic settlement”</i> for Stansted and Great Dunmow, which have <i>“traditional strong townscape character. It is therefore important their identity is protected, and the quality of the townscape is enhanced”</i>	What is written for Great Dunmow and Stansted equally applies to Saffron Walden and should be written in specifically for SW too
36	Core Policy 1, viii	In 2024, new legislation is proposed which will see Local Lead Flood Authorities (LLFA) legal obliged to adopt a SuDs system if all of the design and delivery criteria are met.	SUDs must be built to an adoptable standard by the water authority to relive residents of a management charge  The legislative changes proposed for 2024 must be included in any policies relating to SuDS
	Core Policy 1, ix		New developments MUST provide recycling and waste disposal infrastructure, including food waste
	Core Policy 1, x	Query whether an additional comment to local rewilding and/or re-meadowing initiatives would be encouraged and welcomed	
	Core policy 1 Second to last paragraph <i>“Applications of 1+ dwellings is expected to...”</i>	‘Expected to’ is not a requirement	Change to ‘WILL’ or ‘MUST’ complete a climate change and sustainability statement
38	Core Policy 2		Helpful to add the site allocation map alongside the table
42	Core Policy 3	Turn page around – it is included as a landscape table and is not therefore easy to read	Amend table to portrait

Page	ULP Paragraph	SWTC comment	Proposed Change
47	4.41 bullet 1 <i>“working with partners”</i>	Should refer to other 3 <sup>rd</sup> parties including town and parish councils	Could refer to UDCs statement of community involvement to ensure all parties are involved
	4.41 bullet 3 <i>“completing a developer contribution SPD”</i>	Query – the plan refers to the developer contribution SPD as a future document, but it is already adopted. The plan must be consistent in how it is referred to.	
	4.41 bullet 4, <i>“timely way”</i>		Should be more specific to avoid misinterpretation for example before the build of houses is completed.
	4.42 <i>“essential infrastructure...examples...”</i>	Essential infrastructure must be completed prior to the completion of development. Additionally public open space must also be listed.	
	4.46 and 4.47	Clarity is required here. These paragraphs allude to two different approaches: 1. Creating a master plan approach for developments – OR 2. Pooling monies across separate development applications. IF this is the case the trigger points would be different and can cause confusion in implementation, which has been seen in sites in Saffron Walden and should not occur.	Clarify which approach will take place and should it refer to the adopted developer contribution SPD?
48	4.48	Query When can we expect a revised s106 SPD and cil to be enforced?	
49	Core policy 5	Core policy 5 replaces several of the 2005 ULP policies (LC1, LC2, CL3, CL5, T4, GEN6) should any of these elements be specifically referred to? i.e., LC1, <i>development will not be permitted if it would involve the loss of sports fields?</i>	

**Chapter five North Uttlesford Area Strategy**

Page	ULP Paragraph	SWTC comment	Proposed Change
50	5.2	A good summary of SW and it is this which should be reflected in the summary on page 30 (see comments also made under page 30)	
50	5.2 “infrastructure provision has not always kept up with this expansion. It is essential that any new development provides a comprehensive range .....	Whilst true, it is possible that this paragraph could be interpreted by developers that they are being asked to remedy historic deficits. This therefore raises a query that they should not be tasked with remedying historical deficits and opens an argument for them (developers) that their contributions should be reduced. Developers may dispute that their development alone prompts the need for community provision.	Reword this paragraph so that there is no ambiguity which allows developers to claim the shortage of facilities is attributable to historic failings, thus potentially removing their need and obligations to provide
51	5.7 “due to various constraints, no strategic growth is proposed at Great Chesterford”	What are these constraints? Although they are loosely referenced in para 5.14, the information needs to be more detailed.  They should be identified	Clarify the constraints
51	5.8 bullet 1	Is a three-form school in addition to the proposed Radwinter Road (Linden/Redrow sites) needed? Additionally, there is no reference to early years or sporting provision.	
	5.8 bullet 3	Retail expansion appears to be the same site or nearby the housing allocation, is that most suitable?	
	5.8 bullet 5	Infrastructure enhancements should include sports and recreation	
52	5.10 “an increasing number of people work from home”	What is the source and evidence of this statement?	Evidence statement with reference to source in footnote
52	5.11	Where will the 6 <sup>th</sup> form expansion be located?	Clarify location
52 & 54	5.12  Fig 5.1	Where is the proposed country park located? This paragraph says it is in the east of Saffron Walden, so assume this is the Radwinter Road Rosconn site? Which at time of writing, sits in Swards End parish.  However, figure 5.1, page 54, illustrates the country park to the south west of Saffron Walden	Clarify location
53	5.20	It is called the “Wellcome Genome Campus”	Amend typo



Page	ULP Paragraph	SWTC comment	Proposed Change
54	Figure 5.1	<p>Given the proposed development to the east (abutting the Rosconn site granted planning on appeal), is it appropriate to amend the current community governance review to also consider all of this land in pink as coming into the SW parish, rather than Swards End?</p> <p>The same applies for Great and Little Chesterford as their border review is in progress.</p> <p>Also, the map is of poor quality, uneasy to read.</p>	Consider boundary review of land now given the ongoing and current community governance review
55	Core policy 6, 1 <sup>st</sup> para	Should also note that each settlement should also be porous, to naturally invite and allow access	Amend paragraph to include porosity of each settlement and desire routes. The plan must not create insular settlements.
58	Fig 5.3	Need a map showing all the Saffron Walden proposals (and map for each development) for SW to show the sites, proposed school, country park etc.	
58	Fig 5.3	Difficult to read as landscape, turn to portrait	Change to portrait for ease of reading
60	Core policy 7	Should also include the provision of a local bus service – a shuttle bus type service recognising that the proposed developments are some distance from the town centre and local shopping in support of the local economy is supported	Add in provision for local bus service, acting as a shuttle from the developments to SW town centre.
	Core policy 9 viii	Again, where is the country park located?	
64	5.40	The historical importance of Bridge End Gardens (BEG) should also be noted here to protect it and its surroundings from windfall developments. BEG is a Grade II* listing	Add BEG as a notable public open space it should be considered with the same weight as an asset of historical value.

**Chapter six South Uttlesford Area Strategy**

Page	ULP Paragraph	SWTC comment	Proposed Change
65	6.4	Chapter 6 introduction refers to neighbourhood plans  But the chapter 5 introduction (5.1-5.7) does not	Both should be introduced in the same way
66	heading	Omitted the word 'area'	How the South Uttlesford <i>area</i> will change by 2041
66	6.9	There are two chapters called 6.9	Second bullet capitalize 'g' Great Dunmow
66	6.9	Fourth bullet – is the proposal for two new country parks, one in Takeley and a second in Great Dunmow? If so, where?  (Additionally, a third in Saffron Walden?)	Need to clarify this point
70			Fig 6.2, make map portrait, easier to read (much like Stansted map on page 72)
74			Fig 6.4, make map portrait, easier to read (much like Stansted map on page 72)
75	6.21 <i>Sustainable transport choice to and from the airport should be available over the 24-hour period</i>	'should' does not give certainty improved transport links will be provided, and where do these routes start/end – i.e., could a Saffron Walden resident get to and from the airport before/after any flight time?	
80	Core policy 13	This policy seems far more specific and measurable than core policy 7, for the north Uttlesford area – whilst they can not be mirrored exactly the same principles should be in place	

### Chapter seven Thaxted Area Strategy

Page	ULP Paragraph	SWTC comment	Proposed Change
92	Core policy 17, iv	Provides enhancements for travel between Thaxted and Great Dunmow – enhancements should also be provided between Thaxted and Saffron Walden	

### Chapter eight Rural Area Strategy

Page	ULP Paragraph	SWTC comment	Proposed Change
102	Development Policy 1	The policy needs strengthening. <i>'Dwellings... will only be permitted when one or more of the following apply.'</i> It is assumed if not an application will be refused?	Add <i>'Otherwise, the application will be refused'</i>
105	8.24/ 8.25		Paragraph is carried over, 8.24 ends 'Diversification' and 8.25 starts 'proposals' Correct typo
105	8.25 <i>This is preferably supported by</i>	Can an estate plan be mandatory? Giving a preference is not mandatory.	Change to <i>applications must be supported by an estate plan</i>
105	Core policy 21 <i>Diversification shall normally be permitted providing that</i>	It is unclear whether all the requirements i-v must be demonstrated for diversification to be permitted	Must be clear in stating all are met

**Chapter nine Climate change, transport and the environment**

Page	ULP Paragraph	SWTC comment	Proposed Change
106	9.1	Bridge End Gardens (BEG) should be specifically listed here, along with Hatfield Forest, as an area of high value	Add in BEG
119	Core policy 22 Net Zero Operational Carbon Development	Typo Appendix 1 (page 3) incorrectly refers to core policy 22 as Rural Diversification	Amend as needed
122	Core policy 25 Last paragraph	Needs strengthening  "proposals <i>should</i> be accompanied by an energy statement"	Proposals 'will' or 'must' be accompanied by an energy statement.
123	9.56	Strengthen this requirement from "should be considered" to "must be considered and implemented"	Strengthen statement
125	9.69	Explains the design of streets and other transport elements should reflect the Uttlesford design guide and national guidance  Should UDC adopt the Essex Design Guide or not?	Throughout the plan design guides are referred to and it should be clear whether this is Uttlesford's or Essex County Council's  The plan must be consistent in which document it refers to and/or add the appropriate footnote.
126	Core Policy 26 Providing sustainable transport and connectivity	Typo Appendix 1 (page 3) incorrectly refers to core policy 26 as renewable energy infrastructure	
	Core Policy 26	UDC should work with UDC and town/parish councils acknowledging the local experience and knowledge must be utilized	Council will work with ECC AND local councils
	Core Policy 26	There should be a mention of the highway code hierarchy of road users	Refer to Highway code
128	Core policy 27 Assessing impact of development on	Typo Appendix 1 (page 2) incorrectly refers to core policy 27 as Providing for sustainable transport and connectivity	Correct typo

Page	ULP Paragraph	SWTC comment	Proposed Change
	transport infrastructure		
130	Core policy 28 Active Travel	<p>Typo Appendix 1 (page 2) incorrectly refers to core policy 28 as Assessing impact of development on transport infrastructure</p> <p>iii: refers to PROWs (along with page 63 of the plan). It would be helpful if the plan defines what is considered as a PROW. Whether it is those formally agreed with Essex Highways and/or informal unregistered rights of way.</p> <p>It is important that all established rights of way are protected, whether they are formally registered or not. This is particularly important with the ongoing national effort to register unregistered rights of way.</p>	<p>Correct typo</p> <p>Define rights of way and include informal unregistered routes.</p>
130	Core policy 29 Electric and low emission vehicles	<p>Typo Appendix 1 (page 2) incorrectly refers to core policy 29 as active travel walking and cycling</p>	
131	9.90	This is a good item however should include any informal unregistered routes ( <b>see above comment, re core policy 28, page 130</b> )	Inclusion of informal unregistered routes
132	Managing parking 9.95	<p>UDC should adopt and enforce the ECC council parking standards</p> <p>Notably ECC is carrying out a parking guidance consultation (closing 04.12.2023) will the new guidance be adopted?</p>	
	Core policy 31 Parking Standards	<p>The policy needs strengthening to avoid doubt, proposals MUST have regard to the standards and design codes</p> <p>Typo Appendix 1 (page 2) incorrectly refers to Car Parking Standards policy as Core Policy 32 (should be 31)</p>	<p>Add proposals 'must'</p> <p>Correct typo</p>
133	9.98 'other partners'		Also specify town and parish councils

Page	ULP Paragraph	SWTC comment	Proposed Change
133	9.98	Strengthen statement to note that the creation / use of local delivery hubs will be actively encouraged	Strengthen statement
	Core policy 32 movement of freight	<p>Paragraphs 1,2 and 3 are fairly vague. Is this implemented for only major developments of 10+ dwellings?</p> <p>What constitutes a proposal generating '<i>significant number of transport movements</i>'?</p> <p>Is this considering transport movement of a completed development and/or during the building phase?</p> <p>Last paragraph 6, can local councils support implementation of a delivery hub?</p>	
136	Core Policy 33 Managing Waste	Should refer to the ECC Waste Strategy Appendix 1 (page 2) incorrectly calls core policy 33 movement of fright	
140	Core policy 34	Has the potential to include that use of grey water for flushing of toilets will be supported	Strengthen policy to include use of grey water systems in new developments
140	Core policy 34, 1 <sup>st</sup> para, last sentence	Advises that " <i>new residential development that achieves at least the water efficiency ..... Will be supported</i> " but it does not say that developments which achieve less than this are unacceptable	Strengthen policy to note that developments which fail the set standard will not be supported
140	Core policy 34 "contamination"	Should there be reference here to the consequences if water / land is contaminated as a result of the development / building?	Clarify position
		Core policy 35 and 36 are both named incorrectly in appendix 1 (page 3)	
145	Core policy 37 sustainable urban drainage	Last paragraph noted <i>all proposals for SUDS should include arrangements for maintenance</i> . This is vague and SUDs must be built by an adoptable standard for the lead flood authority, this means residents do not incur an additional management charge from a management company.	Change to MUST include arrangements for maintenance. Refer to need to comply with new legislation in 2024 mandating that LLFA take on SuDS units provided they are built to acceptable standards.

Page	ULP Paragraph	SWTC comment	Proposed Change
		Appendix 1 (page 3) incorrectly names policy 37 the natural environment.	All references in Appendix one need checking
		Core policy 38, 39, 40, 41, 42, 43 are all named incorrectly in Appendix 1 (page 3)	Correct appendix one
145	Core policy 37	<p>The final proposal should be strengthened to specifically note and agree how the developer will make arrangements for the whole life management and how this will be managed and charged.</p> <p>The policy begins all major developments must i-viii, it should be specified if all these items are not met then permission will not be granted.</p>	<p>Clarify and strengthen policy</p> <p>POS should be defined to replicate that of the Saffron Walden Neighbourhood Plan – <i>POS is where you can play football / walk a dog / fly a kite</i></p>
151	Core policy 39, point vi	This notes that SuDs have a recreational value. Whilst aesthetically they have a recreational value, <b>they must not be formally included as public open spaces within a s106 as they are not.</b> The square metre of the SuDs cannot be offset as part of the developer's obligation to provide public open space	Specifically note that the SuDs is not an inclusive part of the public open space when forming a S106
154	Core policy 40	<p>Paragraph 4 <i>Setting out how the site will be maintained over 30 years</i> – this should also refer to WHO is carrying out the maintenance.</p> <p>The UDC developer contribution SPD suggests Town Councils should adopt land, with a maintenance financial contribution of 20 years, should the time period be the same?</p>	<p>Paragraph 4 <i>All major applications should – change to all major applications MUST</i></p>
155	Core policy 41		Rather than 'expected to' change to 'Development proposals MUST' paragraphs 1 and 2
	Core policy 41, point iv	<p>Developments should be porous and fluid, enabling ease of access and integration of each</p> <p>See our page 55 comment regarding core policy 6</p>	Clarify point and purpose of this policy

Page	ULP Paragraph	SWTC comment	Proposed Change
	Core policy 41 last paragraph	Who determines whether a smaller proposal will require a landscape and visual impact assessment	Specify UDC will determine where LVIA is required and NOT the developer
156	9.153 <i>The council will expect the development to mitigate any negative effects caused</i>	Mitigation measures must be in place PRIOR to the development, i.e., cycle lanes, schools, car clubs must be in place so residents can access these services when they move in, not once the development is complete	
157	UDC air quality guidance 2018	Query - Will a revised version be prepared?	Refer to UDC air quality guidance 2018 and add – ‘or its successor document’.

#### Chapter ten – Economy and Retail

Page	ULP Paragraph	SWTC comment	Proposed Change
163	10.4	If a site is an ACV, when providing proof of 12 months with no sale, when do the 12 months begin? I assume after the ACV 6 month period, therefore evidence of 18 months would be provided?	
163	10.6	Appendix 14 omitted the Saffron Walden Homebase site and units.	Correct appendix 14 - add the Homebase site.
170	10.25	Typo ‘circumstances4’	Correct typo
170	10.27	Will the local plan seek to designate the town centre with an article 4 direction? Should there be reference to the twice weekly market?	
170	10.33	Should there be reference to the train station, neighboring industrial, office and business units at Great Chesterford Court?	



Page	ULP Paragraph	SWTC comment	Proposed Change
176	Development policy 7	Could this be strengthened to oblige developers to provide small retail units where housing numbers is greater than xxxxx and is located more than xxxx miles from the nearest retail units?	Consider strengthening/adding to the policy
176	10.52	The paragraph refers to 3 town centres, but then says 'both' (suggesting a reference to only 2)	Correct typo

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**Chapter eleven – Building healthy and sustainable communities**

Page	ULP Paragraph	SWTC comment	Proposed Change
179	11.4	Is it net zero or low carbon? Aim for net zero	Specify net zero
180	11.13 <i>Must demonstrate compliance with LP policies and Uttlesford design code...</i>	Must also comply with neighbourhood plan design statements	Refer to NPs too
179	11.8	Refers to the Uttlesford Design Guide – has this been formally adopted by UDC yet. If not, should it be referred to as the <i>draft</i> guide?	Clarify point
181	Core policy 52	Again uncertain UDC has adopted the Essex Design Guide, if not it must adopt the code before referring to it within its own policies  iii footnote UDC community engagement protocol footnote refers to the document as draft is it adopted?	Adopt Essex Design Guide  <i>'Proposals should change'</i> to proposals 'MUST' or 'WILL'
181	Core policy 52	Could this be strengthened to say that new build should follow the principles of "Building Beautiful Places" published by The Policy Exchange, <a href="https://www.policyexchange.org.uk/wp-content/uploads/2019/07/Building-Beautiful-Places.pdf">Building-Beautiful-Places.pdf (policyexchange.org.uk)</a>	Consider increasing standards to Building Beautiful Places
181	Core policy 52	The 10 characteristics as shown have been lifted from the National Design Guide. Could UDC enhance any of these to strengthen the impact	Consider increasing/improving on the characteristics
181	Core policy 52	Refers to the UDC Community Engagement Protocol which still appears to be (from the link provided) in draft format	Clarify if the engagement protocol has been adopted
183	Core Policy 52	Makes reference to a 'Uttlesford Quality Review Panel' is this a new thing? Should there be a link to its makeup, purpose etc?	Clarify role of the Quality Review Panel
182	Development policy 9	Assume contributions must be financial? How is this calculated?	The policy should establish a developer contribution in terms of either £xxx per xxx number of houses or a percentage of the total S106

Page	ULP Paragraph	SWTC comment	Proposed Change
		<p>Is this requirement included within the developer contribution SPD, which document takes precedence?</p> <p>Paragraph 3 explains proposals need to be in accordance with the Design Code but town and parish councils be consulted as they will understand local knowledge and suitable locations</p>	
183	Table 11.1	<p>Note the affordable housing has been reduced from 40% to 35%.</p> <p>How does this reduction support the local housing need/demand?</p> <p>Earlier statistics (see para 10.14) noted the number of young people in the district (higher than the English average), so how does reducing the number of affordable houses support these young people?</p> <p>Cross refer to comment for page 187, para 11.32</p> <p>Provision of affordable housing for young people must be met.</p>	Reinstate affordable housing to 40%, rather than the proposed decrease to 35%
183-184	Housing	<p>Must be reference to suitable <del>dispensing</del> distribution of housing types and sizes to ensure there are no clusters of house types</p>	
184	Core policy 53	<p>Refers to live/work units, noting these will be encouraged. These are NEVER retained as live/work units and are also referred back to planning (some years later) for conversion to fully residential</p>	Suggest removing encouragement of live/work units
187	11.32	<p>Refers to the unaffordability of housing in the district, which has worsened. This does not support the reduction of affordable housing from its current 40% to 35%. Cross refer to comment for page 183, table 11</p>	Reinstate affordable housing to 40%, rather than the proposed decrease to 35%
188	Core policy 56 <i>Para one –</i>		Strengthen statements MUST provide xx% as affordable

Page	ULP Paragraph	SWTC comment	Proposed Change
	<i>With capacity to provide 10 or mote units should provide Para three- Should incorporate</i>		MUST incorporate a mix of sizes
195	Core policy 60	Should the plan set aside any identified land for the travelling community?	Identify any proposed sites set aside for the travelling community
197	Core policy 62	'Proposals should' must be strengthened	Change to 'will' or 'MUST' conserve character
199	11.74	Is there any intention to add to the article 4 areas? Helpful t add a footnote to the conservation appraisal document	
200	Core policy 63	Should the policy also refer to development within article 4 areas?	
203	11.88		Typo 'females27'
205	Core policy 66		All major proposals should Change should to MUST
206	Table 11.1		Add footnote to open space study
206	11.100	Where re the statistics evidencing an oversupply in fitness provision? Not certain this is true knowing lots of local groups have waiting lists and/or oversubscribed	
207	Core policy 67	The first paragraph (i-iii) suggests all three items are required by using the word 'and'  However, the second set of requirements (iv-vii) could be interpreted in a way that all items are not required.	Make sure both sets of requirements are included by using the word 'and' after each item. Clarify items i-iii and iv-viii are all required
207	Core policy 67	Onsite / offsite provision section - refers to summer 2023, unclear why? Assume this should read summer 2024?	Correct to Summer 2024  Change 'may be required' to 'will be required'

Page	ULP Paragraph	SWTC comment	Proposed Change
		- A financial contribution <i>may</i> be required, should say <i>will</i> be required to avoid interpretation	
211	Core policy 69	Whilst burial land is the responsibility of town and parish councils, S106 funding is required to allow the town councils to purchase and land Please ensure future inclusion of burial land monies within S106 discussions	Please ensure future inclusion of burial land monies within S106 discussions
211	Core policy 70	This policy has limited weight and needs strengthening	Change ' <i>Development should take</i> ' to development ' <i>must take</i>

## Chapter 12 – monitoring and implementation

Page	ULP Paragraph	SWTC comment	Proposed Change
212	Core policy 71	The policy could additionally make reference to enforcement procedure when monitoring housing build and contributions  Query - unclear what the 'monitoring framework' is?	Define the monitoring framework