

## Uttlesford Local Plan EIP

### Matter 2: Spatial Portrait, Vision and Objectives and Spatial Strategy

#### Issue 2: Spatial Strategy

#### Core Policy 2: Meeting our Housing Needs

Q10 Does the housing requirement in the Plan accord with a local housing need assessment conducted using the standard method as set out in national planning practice guidance?

1. Yes, the housing requirement of 13,500 homes over the proposed plan period accords with the housing assessment using the standard method which results in a minimum housing need of 675 dwellings per annum (dpa). However, this is capped figure which, as is noted in paragraph 2a-007-20190220, reduces the number generated by the standard method, in the case of Uttlesford down from 723 dpa, but does not reduce the need itself. This paragraph goes on to note that strategic policies adopted with a cap may require an early review to ensure that any housing need above the capped level is planned for as soon as possible. On the basis of this and that the housing need required by the latest Framework (NPPF24) is 804 dpa, HBF would recommend that an early review policy is included in the local plan providing a clear statement as to when a new local plan will be submitted for examination.

Q11 Has the Council been requested to meet any housing need arising within neighbouring areas to the district of Uttlesford?

2. The Council state on page 16 of the Duty to Co-operate Topic paper that there is no identified unmet housing need for Uttlesford to consider. HBF does not dispute this, however there is a risk that there will be unmet housing needs as new plans come forward in neighbouring areas in response to the NPPF24. Whilst it is not for this local plan to address these unmet needs it does point to the need for an early review of this plan in order to align with the preparation of other plans in neighbouring local authorities.

Q12 Is there an identified supply of housing that provides specific deliverable sites for the first five years following the intended date of adoption of the Plan?

3. If the plan is found sound HBF assume the plan is likely to be adopted by the end of 2025. As such the plan will need to show it has a five-year land supply from 2025/26. Outlined below are the five-year housing land supply

assessments based on the Council's proposed trajectory. Using the Sedgefield approach as advocated in PPG and with no buffer applied the Council can show a five-year land supply on adoption. However, if a 20% buffer is required to take account of significant under delivery in previous years the Council cannot show a five-year land supply from the date of adoption.

	<b>No buffer</b>	<b>20% buffer</b>
<b>Five-year requirement</b>	3,375	3,375
<b>Deficit</b>	-364	-364
<b>Add deficit</b>	3,739	3,739
<b>Buffer</b>	0	748
<b>Total req</b>	3,739	4,487
<b>Five-year supply</b>	3,830	3,830
<b>Surplus/deficit</b>	+ 91	-657
<b>5YHLS</b>	5.12	4.27

*Q13 Are there specific developable sites or broad locations for housing for the subsequent years of the Plan period?*

4. No comment.

*Q14 Is there a requirement for a buffer to account for recent past under delivery?*

5. Footnote 35 to paragraph 69 of the NPPF outlines that the appropriate buffer should be included in the assessment as to whether a local plan will have five years of deliverable sites from the point of adoption. Whether a buffer is required is set out in paragraph 77 of NPPF23 which states that where delivery over the previous 3 years falls below 85% of the housing requirement, as indicated by the Housing Delivery Test (HDT), the Council should include a 20% buffer. The most recent HDT published by MHCLG is December 2024. This shows that the HDT for Uttlesford is 46% which means that the Council must include a buffer of 20% to the first five years of the deliverable sites. As such the five-year housing requirement on adoption is 4,487 homes. As set out above, this is not the case with the Council only having 4.27 years of supply from adoption.

*Q15 Does the planned housing supply provide an adequate buffer to cater for uncertainty in the delivery of housing over the Plan period?*

6. On the basis of Appendix 2 to the housing trajectory the Council expect to deliver 9% more homes than they are required to over the plan period. Whilst this is slightly below the 10% minimum HBF consider is necessary to ensure flexibility in supply it is probably sufficient. However, in lieu of a larger buffer HBF would suggest that an early review policy is included in this local plan to ensure that the Council can plan not only to meet the higher needs required by the new NPPF but also to align with neighbouring authorities some of whom my struggle to meet their own needs in full.

Q16 Is there compelling evidence that windfall sites will form a reliable source of supply over the Plan period? How is the level of windfall dwellings per annum justified?

7. No comment.

Q17 Does the Plan identify land to accommodate at least 10% of the housing requirement on sites no larger than 1 hectare?

8. In paragraph 6.7 of the HELAA (HOU2) the Council recognise the requirement set out in paragraph 70 of the NPPF for 10% of the housing requirement to be on sites identified through the local plan or brownfield register. The Council go on to state in paragraph 6.8 of the HELAA (HOU2) report that the 10% small site requirement can be met from windfall alone. As set out in our representation the Council cannot include windfall sites in seeking to meet this important requirement of national policy as these are not specifically identified in the local plan. The definition of windfall in the Glossary of the NPPF states “*Windfall sites: Sites not specifically identified in the development plan*” and as such cannot be used considering the number of homes that will be delivered in meeting this requirement of national policy.
9. The Council then reference Appendix 4 of HOU2 which provides evidence of sites that are under one hectare, and which are considered to be developable by the Council. The total number of dwellings the Council consider it possible to deliver on these sites is 798 – 552 homes short of the 10% required by paragraph 70. However, HBF would question whether all of these sites meet the expectation in the NPPF of small sites that are identified through the local plan or brownfield register. None of the sites in Appendix 4 appear to have been allocated in the local plan and on examining the Council’s brownfield register which is currently on their website<sup>1</sup> there were only 5 sites (with potential to deliver 52 homes) overlapping with Appendix 4. However, it would appear this was last updated in December 2020 and that this may have changed.
10. As we noted in our representations the reason for paragraph 70 of the NPPF is to provide to smaller developers the greater certainty that allocation in the local plan or identification in the brownfield register provides. The effect of an allocation is to take some of the risk out of that development and in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period. It is therefore vital that the plan is amended to include allocations of site under one hectare. As the Council already have a list of such sites they have assessed and consider to be developable this should be a relatively straight forward process.

Q18 Does the Plan accommodate different housing needs, including affordable housing, housing for the elderly and disabled, and self and custom build?

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<sup>1</sup> <https://www.uttlesford.gov.uk/article/4921/Brownfield-land-register>

11. No comment.

*Q19 How realistic are the assumptions around housing supply in the housing trajectory?*

12. No comment.

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