

Sent by email to: planningpolicy@uttlesford.gov.uk

26/11/2018

Dear Sir/ Madam

Response by the House Builders Federation to the Focussed changes on the Uttlesford Local Plan

Thank you for consulting the Home Builders Federation (HBF) on these focussed changes to the local plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Focussed changes 2, 3, 4 and 5

We recognise that the Council has concerns regarding the decision by the Inspector examining the North Essex Authorities strategic policies in relation to the deliverability of the Garden Communities being proposed by these authorities. But we would not agree with the approach being suggested in the focussed changes. These changes seek to offset the risk of delayed delivery to the West of Braintree Garden Community through a commitment to an early review of the local plan. However, this does not provide any certainty that the plan's housing requirement will be delivered in this plan period. Given that the Council are already required to monitor delivery annually and review plans every five years we would suggest that a commitment to an early review is not an effective approach to managing risk.

As we set out in our previous representation we welcome the allocation of the West of Braintree Garden Community as this has the ability to deliver a significant number of homes in this plan and the next. As such this allocation should continue to form a key part of the Council's plan. However, if there is a risk that this allocation, or indeed any other strategic allocation, may be delayed then the more appropriate response would be to allocate additional sites in order to have a more significant buffer between the requirement and housing supply. Such circumstances are the reason why we recommend that the buffer in terms of supply is at least 10% greater than the housing requirement. At present the supply of homes proposed in the local plan is just over 4% of the housing requirement. We would therefore continue to recommend that in order to offset any risks then the Council should increase its buffer between supply and the housing requirement by a minimum of 10%.




Sustainability Appraisal

We note that the Council has recently published an independent review of the Sustainability Appraisal (SA) supporting the Local Plan¹. This review raised a number of significant concerns regarding the SA and in particular its assessment of the reasonable alternatives considered as part of the preparation of the local plan. These concerns must be addressed prior to submission as the fundamental flaws in the SA process outlined in this report will mean that the plan will not comply with the regulatory and policy framework surrounding the sustainability appraisal. As these concerns cannot be rectified by the inspector as part of the examination it is essential that the Council revisit its SA to ensure it can robustly support the Local Plan. We would therefore support option 3 on page 30 of the Independent Review. The Council should address these concerns prior to submission and undertake a further regulation 19 consultation.

Conclusions

As such we do not consider these focussed amendments to be sound, as measured against the tests of soundness set out in paragraph 182 of the NPPF. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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¹<https://uttlesford.moderngov.co.uk/documents/s8879/Enc.%201%20Review%20of%20Regulation%2019%20Sustainability%20Appraisal.pdf>