

Home Builders Federation

Matter 4

UTTLESFORD LOCAL PLAN EXAMINATION

Matter 4 – The Spatial Strategy (Policies SP2 & SP3)

6. Is the approach set out in policy SP3 of providing a large proportion of new homes within garden communities realistic?

The HBF welcomes the decision to plan for garden communities in Uttlesford which are an effective approach to meeting the long-term needs of an area. However, we are concerned that decisions to plan for such communities are often undertaken without recognising the risks of placing a significant reliance on these new communities to meet housing needs. Whilst the HBF cannot comment on the specific delivery expectations on the proposed garden communities should any of these developments be delayed or not achieve their expected rates of delivery there is a substantial risk that the plan will not secure the level housing required to meet identified needs.

So, whilst we support the decision to allocate these sites, we also consider it necessary to ensure that there is a significant buffer within supply to offset the greater risks to delivery. As set out in our representations the HBF consider a 20% buffer between the housing requirement and expected delivery to be necessary to account for the risk of delays. We also note that nationally, Lichfield's research entitled 'Stock and Flow Planning Permissions and Housing Output' indicates that permission was granted for 261,644 new homes in 2015 in England, whilst net completions in 2015–16 amounted to 189,650 (of which 163,940 were new build). Similarly, in a presentation given by a DCLG Planning Director (Ruth Stanier) to the HBF Planning Conference in September 2015, DCLG presented research findings that suggest that 10-20% of permissions do not materialise into a start on site for a number of reasons. In addition, it is estimated that c.15-20% of permissions are re-engineered with a re-permission sought, which would have the effect of delaying completions, potentially for a significant period. Clearly, the application of a significant buffer in the trajectory to compensate for this known issue would be commensurate with these DCLG findings. At present there appears to be only a 5% buffer, and thus limited room for error.

Additional supply should be focused on small and medium sized sites that will come forward early in the plan period offsetting the risks from delays in the strategic



allocations. Small and medium sized allocations are also likely to deliver earlier in the plan period and would enable them to address any existing backlog within 5 years and ensure a consistent supply of land across the plan period.

7. Is the windfall allowance in policy SP3 realistic and is it based on the advice in paragraph 48 of the NPPF?

We have no comment to make on the level of windfall, but we are concerned that the Council are double counting delivery by including windfall in the first three years of the plan post adoption.

8. Should the Plan include more small and medium size sites in order to provide greater choice and flexibility?

Yes. As we outline above the allocation of small and medium sized sites provides an important buffer that reduces the risk of the plan not meeting needs should any of the strategic allocation not come forward as expected. Whilst strategic sites can provide a mix of homes including a more significant buffer off small and medium sized sites will also offer a more significant choice with regard to the location of development and ensure that delivery can be sustained at the required rates.

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