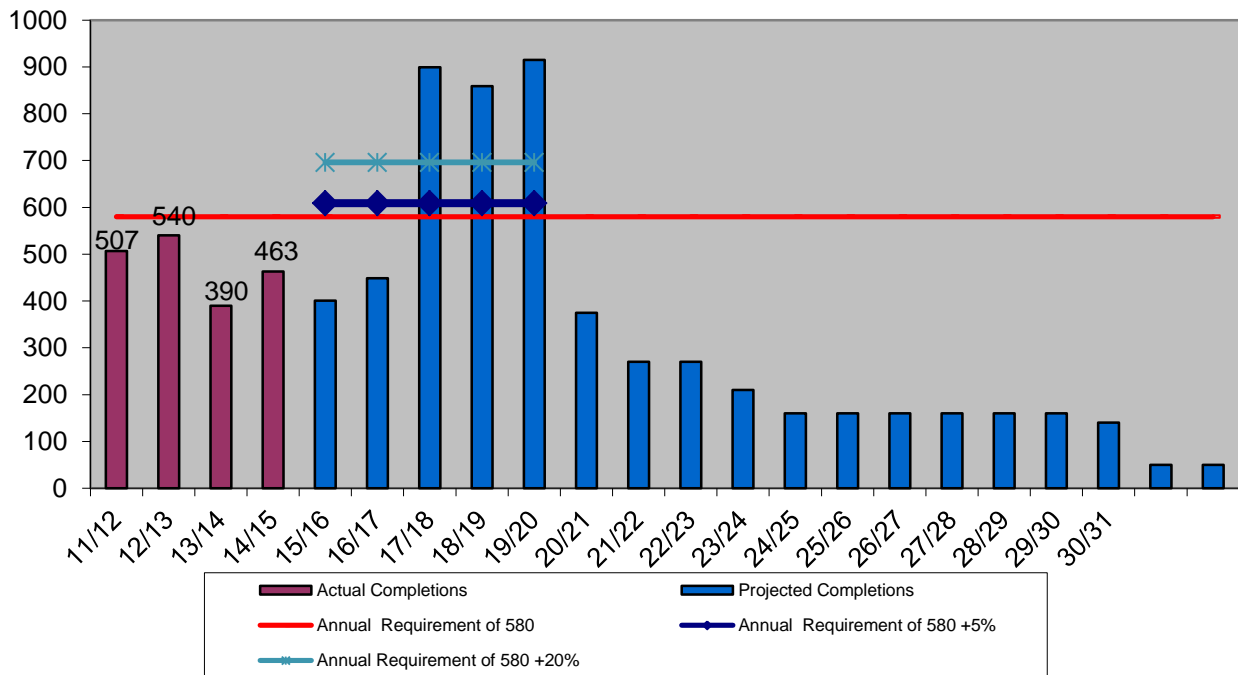




UTTLESFORD DISTRICT COUNCIL
HOUSING TRAJECTORY AND 5-YEAR LAND SUPPLY
1 April 2015

Diagram 1: - HOUSING COMPLETIONS AND TRAJECTORY 2011 TO 2033



Introduction

1. The Housing Trajectory and 5 Year Land Supply Statement was first published in June 2015. The Statement has been updated primarily to include the findings of the Strategic Housing Market Assessment (SHMA) published in September 2015 and the decisions of relevant appeals. It also updates the situation in the preparation of the new Local Plan. The base date for the number of houses completed and with planning permission remains at 31 March 2015.
2. Paragraph 47 of the National Planning Policy Framework requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
3. The purpose of this Statement is to set out the Council's 5 year housing supply and an indicative trajectory of housing delivery during the plan period. The 5 year period covers the period 2015/16 to 2019/20.



4. The 5-year land supply data uses a base date of 31 March 2015 and only uses known data i.e. actual completions and actual planning permissions.

Housing Need

5. The council's adopted Local Plan 2005 pre-dates the National Planning Policy Framework (NPPF) and a new Local Plan reflecting the NPPF is being prepared and is programed to be submitted for examination in 2017.
6. The Council together with its partner authorities of East Herts, Epping Forest and Harlow commissioned consultants ORS to carry out a Strategic Housing Market Assessment (SHMA) which was published in September 2015 and will be used to develop the Objectively Assessed Housing Need (OAN) for the area. The study has been carried out following the requirements of the National Planning Policy Framework and the Planning Practice Guidance and a technical advice note published by the Planning Advisory Service. The SHMA identifies the Full Objectively Assessed Need for Housing in West Essex and East Hertfordshire to be 46,100 dwellings over the 22 year period 2011-2033. The need within Uttlesford for that period is 12,500 dwellings or 568 dwellings per year.
7. Prior to the publication of the SHMA the Council accepted the final conclusions and recommendations of the Local Plan Inspector. In his conclusions, dated 19 December 2014, the Local Plan Inspector considered that the demographically modelled household projections required some upward adjustment to take into account market signals such as affordability. In his view it would be appropriate to examine an overall increase of around 10% to about 580 dwelling per annum.
8. The recommended OAN provides a slightly lower figure of 568 dwellings per year to the 580 recommended by the Local Plan Inspector. It also forms a basis for discussions with neighbouring authorities under the Duty to Cooperate and to decide how much, if any, additional housing needs to be provided by any neighbouring authorities. Those discussions are ongoing and will not be finalised for some months. The figure of 580 has been subject to examination whilst the figure of 568 has not. For the purposes of this updated Statement it is considered appropriate to consider both figures in relation to 5 year land supply.
9. In relation to other aspects of housing requirement the Local Plan Inspector made the following comments
 - a. That housing delivery performance over the last 13 years has not fallen significantly below appropriate targets for the years in question and therefore the buffer does not need to be increased beyond the standard 5%. Appendix 1 provides further explanation and evidence as to why the Council considers that a 5% buffer is appropriate.
 - b. There is no local or contemporary evidence which would justify the application of a standard 'lapse rate; for outstanding residential planning permissions.
 - c. There is no requirement to add to the Objectively Assessed Need to cater for any 'backlog' calculated against years preceding the 2011 base- year.
10. It is therefore considered that it would be prudent to consider a range of housing requirements ranging from the most recent official Household Projections to the Inspector's conclusions.



		+ 5% buffer
Requirement A based on Inspector's conclusions (December 2014)	580	609
Requirement B based on Strategic Housing Market Assessment (published September 2015)	568	596

Housing Supply

11. In relation to supply of housing, the Local Plan Inspector concluded that the windfall allowance of 50dpa is reliably based upon well-evidenced research and consistent with the NPPF.
12. He considered that the housing trajectory at the time of the examination reflects a generally healthy land supply with deliverable sites of various sizes controlled by a wide range of house-builders across a good range of locations. The housing supply has now been rolled forward a year and updated with completions and new planning permissions.
13. Appendix 2 lists, in order by Parish, all the sites which are considered to provide housing during the period up to 2033. It includes an allowance for windfall sites of 50 dwellings per year based on historic rates of completions on windfall sites and the policy context in which they are likely to continue to be provided at this rate. All sites for 6 or more dwellings are individually listed. There are 9 categories of site. The current trajectory does not include any sites in categories 7 to 9.
1. under construction
 2. with planning permission (full or reserved matters covering whole site)
 3. with outline permission with part(s) covered by reserved matters
 4. with outline only
 5. where full, outline or reserved matters at post committee resolution subject to S106 negotiations
 6. with application submitted
 7. with pre-application discussions occurring
 8. allocation only
 9. draft allocation
14. Tables 1 to 3 below sets out the actual and estimated completions for each year during the plan period.

Table 1 Actual completion rate since 2011					
Year	11/12	12/13	13/14	14/15	total
completions	521	540	390	463	1914

Table 2 Estimated completion rate for 5 year period						
Year	15/16	16/17	17/18	18/19	19/20	Total
	Yr1	Yr 2	Yr 3	Yr 4	Yr 5	
estimated completions years 1-5	399	450	904	862	915	3530

Table 3 Estimated completion rate for years 6 to 18													
Year	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33
	6	7	8	9	10	11	12	13	14	15	16	17	18
Estimated completions	375	270	270	210	160	160	160	160	160	160	140	100	50



15. As set out in Table 4 the Council's overall target over the next 5 year period is estimated to range between 3358 and 3471 dwellings which includes making up the shortfall of dwellings and the buffer of 5%
16. The Council estimates that 3530 dwellings will be delivered over the next 5 years which provides the District with 5.1 – 5.3 years of supply depending on the housing target.

Table 4 Calculation of 5 year housing supply		Requirement A (Inspector's conclusions)	Requirement B (SHMA)
Annual Target	AT	580	568
Target years 1 – 5	AT x 5	2900	2840
Shortfall	(ATx4) – completions since 11/12	406	358
Target plus shortfall		3306	3198
5% of target plus shortfall		165	160
Overall target	T+	3471	3358
Supply	S	3530	3530
% of target available on deliverable sites	(S/T+)x100	102%	105%
Supply in years	S/(T+ /5)	5.1	5.3
Deficit/Surplus	S-(T+)	+59	+172



Appendix 1

In considering whether the council has a record of persistent under delivery the Council has considered its delivery against its annual requirement over the last 10 years and also its cumulative delivery against annual requirements over the last 10 years as shown in the two tables below.

Delivery against 10 Year Annual Requirements				
Year	Target	Delivery	Delivery against Targets	
2005/2006	320	542	222	✓
2006/2007	430	326	-104	x
2007/2008	430	543	113	✓
2008/2009	430	441	11	✓
2009/2010	430	523	93	✓
2010/2011	430	302	-128	x
2011/2012	523	521	-2	x
2012/2013	523	540	17	✓
2013/2014	523	390	-133	x
2014/2015	580	463	-117	x
Total	4619	4591	-28	

Cumulative delivery against 10 Year Annual Requirements					
Year	Target	Cumulative	Delivery	Cumulative	
2005/2006	320	640	542	542	✓
2006/2007	430	750	326	868	✓
2007/2008	430	1180	543	1411	✓
2008/2009	430	1610	441	1852	✓
2009/2010	430	2040	523	2375	✓
2010/2011	430	2470	302	2677	✓
2011/2012	523	2993	521	3198	✓
2012/2013	523	3516	540	3738	✓
2013/2014	523	4039	390	4128	x
2014/2015	580	4619	463	4591	x
	4619		4591	-28	

The targets applied and accepted by the Local Plan Inspector were derived from the former East of England Plan (RSS) which was the only policy document to set out annualised targets. The former Structure Plan contained no annual target and was superseded in 2008



by the RSS before the expiry of the Structure Plan period. Policy H1 of the East of England Plan set an annual target of 400 but the Council recognised that it had not met this target in previous years and used the higher figure of 430, as also set out in Policy H1, to compensate. The RSS recognised that where delivery had fallen short in previous years a higher delivery would be required in order to meet the housing targets of the Plan. The lower figure of 320 (also set out in Policy H1) for the period before 2006/07 therefore offsets the 430 for the following years. In fact from 2001 to 2008 there were no specific annual targets against which the Council was required to measure performance and it was only with the introduction of the RSS and the later NPPF that annual targets have been used to provide an assessment of successful delivery for each year.

The target of 523 used for the years 2011 to 2014 was used by the Council in its draft Local Plan and was used to measure delivery. These were the targets that the Local Plan Inspector considered to be appropriate. The latest year has been increased to 580 to reflect the Inspector's recommendation. Subsequent years are likely to reflect the SHMA.

When assessing the individual years of delivery against the respective target for that year, (i.e. the tick box approach) it is accepted that there has been under-delivery in 5 of those years. However, there is no requirement set out in guidance that delivery of dwellings has to match the average provision every year. This approach does not reflect that housing is delivered in 'lumps' and it follows 'cycles' so variations about the annual average should be expected. The second table above therefore considers the degree to which there has been under or over delivery. It shows that over the last 10 years the Council has only under delivered by 28 dwellings. It had, therefore, delivered 98% of its target requirement over the last 10 years.

The Council therefore consider that the evidence shows that the Council has not persistently under delivered and should therefore apply a 5% buffer.

The Council's belief that it needs to apply a 5% buffer has also been supported by recent appeal decisions within Uttlesford District and the Local Plan Inspector.

Flitch Green (APP/C1570/A/12/2181608)

Inquiry held May 2013; Decision August 2013; Appeal dismissed

This appeal related to a development that included 168 dwellings as well as sport pitches and community facilities at Flitch Green. The Inspector considered that:

Because the Council has in most years provided the necessary housing, I consider that there is not persistent under delivery and so only a 5% buffer would be required as specified in the Framework.' (paragraph 27)

Bentfield Green at Stansted Mountfichet (APP/ C1570/A/13/2201844)

Inquiry held November 2013; Decision January 2014; Appeal dismissed

This appeal related to a development including 140 dwellings and primary school. The Inspector accepted that Uttlesford was a 5% authority and did not require a 20% buffer.

Bolford Street, Thaxted (APP/C1570/A/14/2212188 & 2210404)

Considered through written representation; Decision June 2014; Appeal dismissed



The appeals related to a development of 5 dwellings and a development of 13 dwellings. The issue of persistent under-delivery was addressed and the Inspector commented that:

The figures allow for a 5% buffer rather than the 20% required where there has been a record of persistent under delivery of housing. However, while the housing trajectory 2001-2018 shows that there has been under-delivery in some years in the past, this has not been such a regular occurrence as to be persistent in my judgement, and a 5% allowance is therefore appropriate. (paragraph 19)

Sunnybrook Farm, Felsted (APP/C1570/A/14/2213863)

Hearing Date August 2014; Decision September 2014; Appeal dismissed

The appeal related to a development of 13 dwellings. The decision supported the Council's belief that it was a 5% authority. The Inspector commented that

The Council has set a target to provide 2885 dwellings over the five-year period 2014/15 – 2018/19. This includes 133 dwellings not delivered since 2011; and 137 dwellings to provide a 5% buffer in addition to the 523 dwellings required annually. The appellants consider that the Council has a record of persistent under-delivery of housing and that the buffer should be increased to 20% accordingly.

The dispute centres on how the previous RSS target for the period 2001/02 – 2010/11 should be apportioned to individual years and by the Council's interpretation, delivery against the annual target was achieved in most of them. By the appellants' interpretation, it was not. Either way, the overall target for the 10 year period was met and the Council has not carried forward any pre-2011 shortfall into its present assessment of objectively assessed needs. On this basis, I am satisfied that there is no record of persistent under delivery. (paragraphs 23 & 24)

Aylands, Felsted (APP/C1570/A/14/2226257)

Hearing date December 2014; Decision January 2015; Appeal dismissed

The appeal related to a single dwelling. The Inspector concluded that there was a persistent under delivery of housing. However, it is clear from the decision notice that the Inspector only had access to the Summary Conclusions of the Local Plan Inspector (dated 3 December 2014), and not his Full Conclusions which were published later (dated 19 December 2014) and effectively superseded them. The Local Plan Inspector did not address the issue of persistent under delivery in his Summary Conclusions and the Aylands Inspector would not therefore be aware of the Local Plan Inspector's findings and recommendation in respect of the buffer.

St Edmunds Lane, Great Dunmow (APP/C1570/A/14/2223280)

Inquiry date November 2014 and February 2015; Decision May 2015; Appeal allowed

This appeal related to 22 Custom Build dwellings. The Inspector considered that Uttlesford should be a 20% authority. That Inspector did have access to the Local Plan Inspector's Conclusions but considered that '*when the revised objectively assessed need figure of 580dpa is applied retrospectively from 2011/12, the Council has failed to meet its target in 4 of the last 5 years,*' at a time when the Government is seeking to boost significantly the supply of housing. The Inspector commented that '*In my opinion, although I note the Local Plan Inspector's comments in this regard, I consider that this would represent a record of persistent under delivery of housing. As such, the requirement for a 20% buffer applies in this District.*'



The Council's concerns regarding this appeal decision relates to the retrospective application of the 580dpa figure to the last three-years. This was never the figure towards which the Council was working during that period. During the preparation of the Local Plan, the maximum housing supply figure towards which the Council was working towards was 523pa. It seems illogical to judge whether the Council has a record of persistent under-delivery by assessing the supply against a figure which was not, at the relevant time, the appropriate target.

Walden Road, Thaxted (APP/C1570/A/14/222958)

Inquiry date January 2015; Decision June 2015; Appeal dismissed

This appeal related to a development of 120 houses. The Inspector considered that a 5% buffer was reasonable and accorded with the aims and objectives of the Framework. He commented that:

'There is no guidance on how far back one should go to look at the supply achieved. The council fairly points out that the appropriate benchmark is the annual figure contained in the RSS (2008), as before that there were global figures and it was for the council to choose their own trajectory. If you look back at the recent past, while there has been some under-delivery, I would agree with the Local Plan inspector that on the basis of the RSS the delivery has not fallen significantly below appropriate targets for the years in question.'

Thaxted Road, Saffron Walden (APP/C1570/A/14/2221494)

Inquiry date March 2015; Decision June 2015; Appeal dismissed

This appeal related to a development of 300 dwellings and land for open space/recreation use, including an option for a new primary school site. The Inspector concluded that there had not been persistent under delivery and therefore a 5% buffer is appropriate. He commented that

'The Council has exceeded its cumulative requirement for 9 of the 10 years since 2004 even if 580 dpa is used as the target for recent years. The housing requirement for this past period has otherwise been derived from the former East of England Plan which emphasised that the targets were minima with a need to provide for an upward trajectory of completions. Nonetheless, taking account of the peaks and troughs of the housing market cycle it seems to me that the evidence does not support a conclusion of persistent under delivery.'



Uttlesford District Council
Housing Trajectory and Statement of 5-Year Land Supply
Republished November 2015

Site	UTT reference	Date of Permission	Capacity (Gross)	11/12	12/13	13/14	Reporting 14/15	Yr1 15/16	Yr2 16/17	Yr3 17/18	Yr4 18/19	Yr5 19/20	6 20/21	7 21/22	8 22/23	9 23/24	10 24/25	11 25/26	12 26/27	13 27/28	14 28/29	15 29/30	16 30/31	17 31/32	18 32/33	Status
Takeley: Brewers End Takeley	UTT/13/1393/OP UTT/14/3295/DFO	23/08/2013 Feb 2015	100					25	37	38																1
Takeley: Chadhurst Takeley	UTT/13/1518/FUL	12-Sep-13	13					12																		2
Takeley: North View and 3 The Warren	UTT/13/1779/FUL	03-Oct-13	46				-1	22	23																	1
Takeley: Ersamine, Dunmow Road, Little Canfield	UTT/14/0122/FUL	Sep-14	15							15																2
Thaxted: Wedow Road	UTT/1562/11/OP UTT/12/5970/DFO; UTT/13/3420/OP x 4	9 December 2011; 18 February 2013; Feb 2014	59				30	25		4																1
Thaxted: Land off Wedow Road	UTT/13/1170/OP	May-14	47							15	15	17														3
Thaxted: Sampford Road	UTT/12/5754/FUL	08-Feb-13	60				23	18	19																	1
Thaxted: Land East of Barnards Fields Thaxted	UTT/13/0108/OP UTT/14/2426/DFO	07/06/2013 15 October 2014	8					8																		1
Thaxted: Artington, Orange Street	UTT/13/1678/FUL	Aug-13	6						6																	2
Wendens Ambo: Mill House Royston Road	UTT/13/3474/P3JPA	24 February 2014	6						6																	2
Wendens Ambo: The Mill, Royston Road	UTT/14/3091/P3JPA	Dec-14	16				2	14																		1
Wimbish: Land at Mill Road	UTT/14/1688/FUL	Mar-15	11						11																	2
								399	450	904	862	915	375	270	270	210	160	160	160	160	160	160	140	100	50	

KEY TO STATUS
 1. under Construction
 2. with planning permission (full or reserved matters covering whole site)
 3. Outline with some reserved matters determined
 4. with outline only
 5. where full, outline or reserved matters at post committee resolution to Subject S106 negotiations
 6. with application submitted
 7. with pre-application discussions occurring
 8. allocations only