

All Cabinet Members
Uttlesford District Council

15576/A3/MJ

BY EMAIL ONLY

13th December 2012

Dear Councillor

**RE: REPORT INTO GREATER ESSEX DEMOGRAPHIC FORECASTS PHASE 3
COMMENTS ON BEHALF OF LAND SECURITIES**

We write on behalf of Land Securities in relation to Agenda Item 7 for the Cabinet meeting this evening. This item requests that Members confirm the demographic forecasts, and therefore the housing requirement, to be used in the preparation of the new Uttlesford Local Plan. Land Securities have significant concerns regarding the approach taken to calculating the housing requirement in the report, as set out below.

Local housing requirements were previously dictated by the Regional Spatial Strategies (RSS), in the case of Uttlesford District this was contained in the East of England Plan. Since the LDF Working Group approved the report for consideration by UDC Cabinet, on 22nd November 2012, the Government has confirmed that the East of England Plan will be revoked early next year. As a result of this, the housing requirement set out in the East of England Plan cannot be relied upon for establishing the local housing requirement. Instead the housing requirement will need to be calculated in accordance with the National Planning Policy Framework (NPPF).

We are surprised and concerned to see that notwithstanding the length of time your replacement development plan document has been in production (at least from 2008) you are proposing, at this late stage, to significantly change and shorten the plan period from 2001-2028 to 2011-2026. It is not clear why such a change is proposed or is necessary and it will be important that if you choose to progress with this amendment that a full explanation is provided. We are not convinced that having regard to the NPPF, the general thrust of guidance, and the likely adoption date of your plan, if it is found sound, that an end date of 2026 is appropriate. If the plan period is changed to start at 2011 it will also be important to establish the shortfall in housing in the previous plan period and to carry any shortfall forward into the figures for 2011-2026.



Even if it is accepted that the plan period should be 2011-2026, we consider, for the reasons set out above, that the evidence base for establishing housing requirements is unsound. Additionally at paragraph 159, the NPPF requires local planning authorities to establish housing need based on household and population projections, taking account of migration and demographic change. The demographic forecast that is proposed to be used in the preparation of the new Uttlesford Local Plan is based on a constrained employment led set of assumptions and does not take account of migration. Therefore the approach set out in Agenda Item 7 does not accord with the NPPF and is therefore fundamentally flawed.

To establish the significance of the above, Opinion Research Services (ORS) have recalculated the housing requirement using UDCs general methodology but applying the Edge Analytics' migration-led scenario -R figures (as set out in your draft Local plan, June 2012, p32). The results of this exercise have confirmed that UDC need to increase the Local Plan housing requirement and allocate more land for housing than has been proposed for allocation to date. We consider that between 3,600 and 5,100 dwellings will need to be provided over and above the 3,320 dwellings UDC have already proposed for allocation in the period 2011- 2026. Clearly this represents a significant difference in the housing requirement from that indicated in the Item 7 report, and which needs to be taken into account in preparing the new Local Plan.

We trust that you will take the above into consideration in your deliberations regarding the new Local Plan.

Should you wish to discuss this matter please do not hesitate to contact me on 0207 4466888.

Yours sincerely,



ROBIN MEAKINS

Partner

cc: Andrew Taylor - Uttlesford District Council (by email)
Emma Cariaga - Land Securities (by email)
Michael Gallimore - Hogan Lovells (by email)