



Andrew Taylor
Assistant Director: Planning and Building Control
Uttlesford District Council
Council Offices
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Saffron Walden
Essex
CB11 4ER

Ref: FFP005/PDC

21st November 2012

Dear Mr Taylor,

UTTLESFORD DRAFT LOCAL PLAN – Report into Greater Essex Demographic Forecasts Phase 3

I wrote recently on behalf of my client, the Fairfield Partnership to formally set out our concerns regarding the approach that Uttlesford District Council is pursuing in the production of the Local Plan, in particular the approach to housing numbers and distribution of growth.

Having now reviewed the above report to be considered by the LDF Working Group meeting of the 22 November 2013 I write again to address a particular and important concern in connection with the content of this report.

Paragraphs 22-24 of the report refer to the Local Plan timescale. Part of Paragraph 157 of the National Planning Policy Framework is quoted:

Local Plans need to be 'drawn up over an appropriate time scale, preferably a 15 year time period.'

Paragraph 23 of the officer report says: *'The current Local Plan has an end date of 2011 and it is therefore considered appropriate to start the new Local Plan from that date to provide continuity and to ensure continuous Local Plan coverage. This would provide an end date of 2026 for the new Local Plan.'*

This is an incorrect application of paragraph 157 the National Planning Policy Framework. The relevant bullet point of which is quoted in full below:

157. Crucially, Local Plans should:

- *be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;*

The guidance provided in the NPPF is up to date and clear in its terms. Local authorities are expected to produce local plans with a 15 year horizon. The motivation for the approach suggested in the officer report can only be directed at avoiding any review of growth strategies and allocations. There is no genuine logic in paragraph 23 of the report and no reasonable planning justification for this approach, the end date of the last plan is entirely irrelevant by reference to the clear advice contained in the NPPF. As such, it runs counter to a sound planning process, fails to meet the policy requirements for effective planning within the District and is entirely inconsistent with recent drafts of the Core Strategy and Local Plan which have all had a horizon of at least 15 years from their adoption date.

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I have reviewed all timescales for Local Plans and Core Strategies submitted to and examined by the Planning Inspectorate over the past 12-15 months including those submitted and examined since the publication of the National Planning Policy Framework on the 22nd March 2012.

Local Planning Authority and Plan Title	Date of Submission	Plan Horizon
Barnsley, Doncaster, Rotherham - Joint Waste	Jul-11	2026
Bexley - Core Strategy	May-11	2026
Bournemouth - Core Strategy	Nov-11	2026
Buckinghamshire CC - M&W Core Strategy	Nov-11	2026
Doncaster - Core Strategy	Jul-11	2028
Ealing - Core Strategy	Jul-11	2026
Forest of Dean - Core Strategy	Jul-11	2026
Gloucestershire CC - Waste Core Strategy	Sep-11	2027
Harborough - Core Strategy	Apr-11	2028
Hertfordshire CC - Waste CS & Development Management Policies	Jun-11	2026
Hillingdon Core Strategy	Oct-11	2026
Hyndburn - Core Strategy	May-11	2026
Isle of White - Core Strategy	Jun-11	2027
LB Harrow - Core Strategy	Jun-11	2026
LB Redbridge - Minerals Plan	Mar-12	2031
Manchester - Core Strategy	Jul-12	2027
North Somerset - Core Strategy	Jul-11	2026
Portsmouth - Core Strategy	Jul-11	2027
RB Kingston upon Thames - Core Strategy	May-11	2027
Taunton Dean - Core Strategy	Nov-11	2028
Waltham Forest - Core Strategy	May-11	2026
West Berkshire - Core Strategy	Jul-10	2026
Woking Core Strategy	Dec-11	2027
Worcestershire - Waste Core Strategy	Nov-11	2027

No Plan or Core Strategy submitted to the Planning Inspectorate for Examination has had at the time of its submission a time horizon of less than fifteen years. Indeed, most have had a longer timescale. Unsurprisingly, there is no evidence of any other local authority in England and Wales that has determined that their plan should be based upon a 13 year period.

There is no possible justification for foreshortening the period of the Draft Local Plan. Indeed the presence of Stansted Airport and Metropolitan Green Belt call for a plan which covers a longer horizon.

Members should not follow the flawed advice in your report. This will result in Uttlesford District Council embarking upon a course of action that can only result in a finding that this is an unsound plan, which will only serve to waste both time and resources.

Members should instead retain as a minimum a time period of 15 years and refer the matter back to officers for a proper consideration of growth scenarios and distribution strategies. This approach must be supported by a robust Sustainability Appraisal of alternative approaches. The approach to housing numbers should also take account of potential shortfalls against existing housing targets and the potential for non-implementation.



I look forward to the Council's consideration of this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phil Copsey', is written over the typed name and title.

PHIL COPSEY
Senior Associate

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Cc Steve Biart, the Fairfield Partnership

Members of UDC LDF Working Group
Cllr D Morson
Cllr E Parr