
Five-Year Housing Land Supply

Uttlesford District Council

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Appendix 1 New Planning Permissions 1 st April 2022 to 31 st March 2023		

1. Introduction

- 1.1.1. This Assessment of the 5-Year Housing Land Supply (5YHLS) in Uttlesford District (Uttlesford) has been undertaken by Savills (UK) Ltd on behalf of Countryside Partnerships PLC.

2. Context

2.1. National Planning Policy & Guidance

2.1.1. The National Planning Policy Framework (NPPF) states (our emphasis):

Maintaining supply and delivery

73. ... Local planning authorities should identify and update annually a supply of **specific deliverable sites** sufficient to provide a minimum of five years' worth of housing ...

2.1.2. In respect of this, the Government's Planning Practice Guidance (PPG) similarly states (our emphasis):

5 year housing supply

What is a 5 year land supply?

A 5 year land supply is a supply of **specific deliverable sites** sufficient to provide 5 years' worth of housing (and appropriate buffer) against a housing requirement set out in adopted strategic policies, or against a local housing need figure, using the standard method, as appropriate in accordance with paragraph 73 of the National Planning Policy Framework.

Paragraph: 002 Reference ID: 68-002-20190722

Revision date: 22 July 2019

2.1.3. This wording is discussed in more detail in Section 4 of this assessment.

2.1.4. The NPPF continues, under the same heading to explain:

74. A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement ...

2.1.5. In this respect, PPG states (our emphasis):

Demonstrating a 5 year housing land supply

How can an authority demonstrate a 5 year supply of deliverable housing sites?

... For decision-taking purposes, an authority will need to be able to demonstrate a 5 year housing land supply when dealing with applications and appeals. They can do this in one of two ways:

- using the latest available evidence such as a Strategic Housing Land Availability Assessment (SHLAA), Housing and Economic Land Availability Assessment (HELAA), or an Authority Monitoring Report (AMR)

- *'confirming' the 5 year land supply using a recently adopted plan or through a subsequent annual position statement (as set out in paragraph 74 of the National Planning Policy Framework).*

Paragraph: 004 Reference ID: 68-004-20190722

Revision date: 22 July 2019

2.1.6. It reiterates this (our emphasis):

Confirming 5 year housing land supply

How can authorities confirm their 5 year housing land supply?

When local planning authorities wish to confirm their 5 year housing land supply position once in a given year they can do so either through a recently adopted plan or by using a subsequent annual position statement

Paragraph: 009 Reference ID: 68-009-20190722

Revision date: 22 July 2019

2.1.7. To date Uttlesford District Council (UDC) has not sought to prepare an Annual Position Statement (APS) and therefore the 5YHLS in Uttlesford has not been formally 'confirmed'.

2.2. The Five-Year Period

2.2.1. It is usual practice for assessments of housing need and supply to be calculated over periods commencing on 1st April in the relevant year.

Uttlesford Five Year Housing Land Supply Statement

2.2.2. In December 2022 UDC published a '5-Year Land Supply Statement and Housing Trajectory Status at 1st April 2022' (5YHLSS), which includes details of the sites that comprise the 5YHLS.

2.2.3. The 5YHLSS assessment considers the housing land supply in Uttlesford for the period 1st April 2022 to 31st March 2027 (otherwise referred to as the period 2022/23 to 2026/27, inclusive).

2.2.4. The 5YHLSS concludes that UDC is able to demonstrate a 5YHLS of 4.89 years as at 1st April 2022.

2.2.5. It is anticipated that UDC will shortly prepare a new 5YHLSS assessment with the base date 1st April 2023, but based on previous years, it is also anticipated that this will not be published until later in 2023.

The Five-Year Period

2.2.6. Understanding the five-year period is a fundamental aspect of understanding the 5YHLS.

- 2.2.7. Put simply, the housing requirement for a certain five-year period (e.g. 1st April 2022 to 31st March 2027), should be compared to the housing land supply for that same five-year period. The requirement for a different period (e.g. 1st April 2023 to 31st March 2028) should be compared to the housing land supply for that five-year period.
- 2.2.8. The entire point of the requirement for a Local Planning Authority (LPA) to be able to demonstrate a 5YHLS is that it can demonstrate a supply of homes, over a five-year period, that is at least the required number of houses, over that same five-year period. To calculate the requirement over one five-year period, and the supply over a different five-year period would be completely nonsensical.
- 2.2.9. This is the principle used in the calculation of the Housing Delivery Test (HDT). PPG explains (our emphasis):

Which delivery years does the Housing Delivery Test apply to?

The Housing Delivery Test, published in the November of any given year, provides a measure based on the preceding 3 financial years.

Paragraph: 038 Reference ID: 68-038-20190722

Revised date: 22 July 2019

- 2.2.10. The Housing Delivery test Measurement Rule Book (MHCLG, July 2018) further explains (our emphasis):

Housing Delivery test Calculation

5. The Housing Delivery Test is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the areas covered by the Housing Delivery test, over a rolling three year period.

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

And:

15. where the minimum annual local housing need figure applies, this number should be calculated with a base date of 1st April each year. This calculation should use the affordability ratio for the previous calendar year.

- 2.2.11. The HDT Rule Book thus bases the calculation the fundamental principle set out above: that the requirement for each year commencing on 1st April should be established, and then delivery during that year tested against that requirement.

The Fiver-Year Supply

- 2.2.12. Understanding the housing land supply as it exists at the start of the five-year period is also a fundamental aspect of understanding the 5YHLS.

- 2.2.13. Put simply, it is the evidence that is available to the LPA at the base date of the five-year period that should be used to determine whether a site should be included in the 5YHLS.
- 2.2.14. For example, if the evidence to justify the inclusion of a site is only forthcoming nine months into the five year period, at that point there would only be 4.25 years left of the five-year period – nine months' (0.75 years') worth of sites would have been completed and would have 'fallen out' of the 5YHLS.
- 2.2.15. For example:

Five-year requirement: 5,000 dws
Supply (5.00 yrs): 5,000 dws

But if only evidenced after 9 months (i.e. 0.75 years):

Five-year requirement: 5,000 dws
Completed (0.75 yrs): 750 dws
Supply (4.25 yrs): 4,250 dws

2.3. Reference to Additional Evidence of Deliverability

- 2.3.1. If sites are to be added into the supply based on evidence only available post the base date (i.e. 'retrospective' evidence) then so too much housing delivered up to that point. Otherwise the supply is being artificially inflated at one end of the housing supply 'conveyor belt' but reduced as a result of actual delivery.
- 2.3.2. Section 78 appeal Inspectors and the Secretary-of-State have concluded that additional evidence that has arisen or otherwise come to the parties attention after the base date of the five-year period can be taken into account to inform judgements on deliverability BUT the original decision to include the site in the 5YHLS, at the base date of the five-year period, has to be sound and 'robustly' evidenced.
- 2.3.3. This is to ensure a robust judgements about deliverability of sites included as deliverable at the base date. It is important that this is not diluting what components of supply are included as part of an assessment which is determined at whatever base date is selected.
- 2.3.4. In other words, an authority cannot simply include a site in a 5YHLS, with no evidence to support the decisions to do so, and then retrospectively obtain evidence to justify its inclusion. Nor can it add in sites that have only come to light after the base date of the five-year period.

2.4. Onus to Demonstrate

- 2.4.1. The NPPF and PPG place an onus to demonstrate a supply of specific deliverable sites on the LPA. This requires i) a judgement as to whether a site is deliverable and then afterwards ii) a determination as to how many homes the site is likely to yield over the five-year period.
- 2.4.2. This Assessment considers the evidence of deliverability as existed on 1st April 2022, as set out in the 5YHLSS. In addition, Savills has undertaken a review of available information to consider the projected 5YHLS position as at 1st April 2023 for the five-year period 1st April 2023 to 31st March 2028.

3. Requirement

3.1. Local Planning Policy

- 3.1.1. The Uttlesford Local Plan (ULP) was adopted in January 2005 having been prepared prior to the requirements of the National Planning Policy Framework (NPPF). The ULP is significantly more than 5 years old and UDC is currently working towards preparation of a new Local Plan.
- 3.1.2. ULP Policy H1 'Housing Development' sets out a housing requirement of 5,052 dwellings (dws) over the period 2000-2011. This equates to an average of 460 dwellings per annum (dpa) over the 11-year plan period.
- 3.1.3. However, as of January 2010, the Local Plan was over 5 years old, with the plan-period ending in March 2011 (some 12 years ago). No statutory Regulation 10 review of the Local Plan, or Policy H1, has been carried out.

3.2. Step 1: Basis for Five-Year Housing Land Supply Requirement

- 3.2.1. The PPG states:

What housing requirement figure should authorities use when calculating their 5 year housing land supply?

Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where:

- *the plan was adopted in the last 5 years, or*
- *the strategic housing policies have been reviewed within the last 5 years and found not to need updating.*

In other circumstances the 5 year housing land supply will be measured against the area's local housing need calculated using the standard method.

Paragraph: 005 Reference ID: 68-005-20190722

Revision date: 22 July 2019

- 3.2.2. As the Local Plan is older than 5 years old as of the base date of the 5YHLSS – i.e. 1st April 2022 and Policy H1 has not been reviewed, the PPG requires that the Standard Method for calculating Local Housing Need, should be used.
- 3.2.3. The Local Housing Need has been calculated by Savills for the base date 1st April 2022 to verify the calculation prepared by UDC in the 5YHLSS, as shown in Table 3.1, below.
- 3.2.4. In addition, utilising the latest available data at the time of this assessment, Savills has also considered the Local Plan Housing need for Uttlesford at 1st April 2023 as shown in Table 3.2, below.

Table 3.1: Standard Method Local Housing Need @ 1st April 2022

	Calculation Stage		At 1 st April 2022 Source / Calculation
A	2022 Projected Number of Households	37,590	2014-Based Household Projections, Table 406
B	2032 Projected Number of Households	42,536	2014-Based Household Projections, Table 406
C	10-Year Average Increase in Households	495	(B-A) / 10
D	Latest Published Affordability Ratio	13.40	ONS House Price to Workplace-Based Earnings Ratios, Table 5c (2022 ratio published 22 March 2023)
E	Affordability Factor	1.587500	PPG: 2a-004-20201216: $1 + (((D-4)/4) \times 0.25)$
F	Uncapped Standard Method Annual Local Housing Need	785.1825	C x E
G1	Cap (Average Annual Adopted Housing Requirement)	644	460 x 1.4
G2	Cap (10-Year Average Increase in Households)	693	C x 1.4
G3	Cap Applicable (dws)?	693	(As Local Plan requirement over 5 years old and not reviewed, highest of G1 and G2 is applicable.)
G4	Cap Applicable (Y/N)?	Yes	Cap applicable if F is higher than G1 and G2.
H	Applicable Annual Standard Method Local Housing Need	693	G1 (rounded)
I	Standard Method-Based 5YHLS Requirement (excluding buffer)	3,465	G4 x 5

3.2.5. UDC has calculated the applicable annual Standard Method Local Housing Need to be 693 dwellings. Savills agrees with this calculation.

Table 3.2: Standard Method Local Housing Need @ 1st April 2023

	Calculation Stage		At 1 st April 2023 Source / Calculation
A	2023 Projected Number of Households	38,112	2014-Based Household Projections, Table 406
B	2033 Projected Number of Households	42,996	2014-Based Household Projections, Table 406
C	10-Year Average Increase in Households	488	(B-A)/10

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D	Latest Published Affordability Ratio	15.30	ONS House Price to Workplace-Based Earnings Ratios, Table 5c (2022 ratio published 22 March 2023)
E	Affordability Factor	1.706250	PPG: 2a-004-20201216: $1 + (((D-4)/4) \times 0.25)$
F	Uncapped Standard Method Annual Local Housing Need	832.65	C x E
G1	Cap (Average Annual Adopted Housing Requirement)	644	460 x 1.4
G2	Cap (10-Year Average Increase in Households)	683.2	C x 1.4
G3	Cap Applicable (dws)?	683.2	(As Local Plan requirement over 5 years old and not reviewed, highest of G1 and G2 is applicable.)
G4	Cap Applicable (Y/N)?	Yes	Cap applicable if F is higher than G1 and G2.
H	Applicable Annual Standard Method Local Housing Need	684	G2 (rounded)
I	Standard Method-Based 5YHLS Requirement (excluding buffer)	3,416	G4 x 5

3.3. Step 2: Adding any Under/Over-Supply

3.3.1. The PPG states (emphasis added):

How can past shortfalls in housing completions against planned requirements be addressed?
... Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure. ...
 Paragraph: 031 Reference ID: 68-031-20190722
 Revision date: 22 July 2019

3.4. Step 3: Applying a Buffer

3.4.1. The PPG states:

How should buffers be added to the 5 year housing land supply requirement?
To ensure that there is a realistic prospect of achieving the planned level of housing supply, the local planning authority should always add an appropriate buffer, applied to the requirement in the first 5 years (including any shortfall), bringing forward additional sites from later in the plan period. This will result in a requirement over and above the level indicated by the strategic policy requirement or the local housing need figure.
Buffers are not cumulative, meaning that an authority should add one of the following, depending on circumstances:

- *5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5 year housing land supply;*

- 10% - the buffer for authorities seeking to 'confirm' 5 year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in paragraph 74 of the National Planning Policy Framework), unless they have to apply a 20% buffer (as below); and
- 20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results.

Paragraph: 022 Reference ID: 68-022-20190722

Revision date: 22 July 2019.

3.4.2. The 2021 HDT results (the most recent published), as published by DLUHC on 14th January 2022. The HDT result for the period 2018/19 to 2020/21 is 99%.

3.5. Step 4: Calculating the Five-Year Housing Land Supply Requirement

3.5.1. Table 3.3 below sets out the five-year housing land supply requirement as at the base date of the 5YHLSS – i.e. 1st April 2022.

Table 3.3: Five-Year Housing Land Supply Requirement @ 1st April 2022

Calculation Stage		Dwellings	Source / Calculation
A	Annual requirement	693	Standard Method LHN
B	Base Five-Year Requirement	3,465	A x 5
C	5% Buffer	174	5% of B (rounded up)
D	Five-Year Requirement	3,638	B + D

3.5.2. Table 3.4 below sets out the likely five-year housing land supply requirement as at the base date of the 5YHLSS – i.e. 1st April 2023, subject to the publication before then of more up-to-date data.

Table 3.4: Five-Year Housing Land Supply Requirement @ 1st April 2023

Calculation Stage		Dwellings	Source / Calculation
A	Annual requirement	684	Standard Method LHN (rounded up)
B	Base Five-Year Requirement	3,416	A x 5
C	5% Buffer	171	5% of D (rounded up)
D	Five-Year Requirement	3,587	D + E

3.6. Summary

3.6.1. The five-year housing land supply requirement as at 1st April 2022 was 3,638 dwellings.

3.6.2. The five-year housing land supply requirement as at 1st April 2023 will likely be 3,591 dwellings, subject to the publication prior to then of any more up-to-date data.

4. Supply

4.1. Requirement to Demonstrate a 5YHLS

4.1.1. As noted in Section 2 of this assessment, the NPPF states (our emphasis):

Maintaining supply and delivery

*73. ... Local planning authorities should identify and update annually a supply of **specific deliverable sites** sufficient to provide a minimum of five years' worth of housing ...*

4.1.2. And PPG (ID: 68-002-20190722):

5 year housing land supply

What is a 5 year land supply?

*A 5 year land supply is a supply of **specific deliverable sites sufficient to provide 5 years' worth of housing ...***

4.1.3. The NPPF continues, under the same heading, to explain:

74. A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement ...

4.1.4. As also noted in Section 2, in December 2022 UDC published a 'Five Year Housing Land Supply Statement' (5YHLSS), which includes details of the sites that comprise the 5YHLS. The 5YHLSS is not an APS, but it is the only document published by UDC that sets out the 5YHLS. It is the supply of sites set out in the 5YHLSS that Savills has assessed.

4.2. Deliverability

4.2.1. The NPPF defines a 'deliverable' site as follows:

Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it*

should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

4.2.2. The PPG expands on the definition (our emphasis):

What constitutes a ‘deliverable’ housing site in the context of plan-making and decision taking?

In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;*
- are allocated in a development plan;*
- have a grant of permission in principle; or*
- are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- firm progress with site assessment work; or*
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects. ...*

Paragraph: 007 Reference ID: 68-007-20190722

Revision date: 22 July 2019

4.2.3. To understand the requirement that the NPPF and PPG establish, it is helpful to place this in the context of the overall planning process whereby a site might proceed through the following stages:

1. Identification (HELAA) > 2. Allocation (Local Plan) > 3. Outline Permission ¹> 4. Full Permission²

4.2.4. The NPPF and PPG set out that:

¹ Or equivalent, including Permission-in-Principle or inclusion on a Brownfield Register.

² Or equivalent, including Reserve Matters approval or Prior Approval change of use.

- 1. A site that has only been identified in a HELAA should be excluded.
 - 2/3. A site that is allocated or has outline planning permission, or equivalent, should be excluded (the default position) unless there is clear evidence that it is deliverable within the five-year period.
 - 4. A site that has full planning permission, or equivalent, should be included (the default position) unless there is clear evidence that it is not deliverable within the five-year period.
- 4.2.5. The exception to this general approach is that sites / proposals for 'minor' development (i.e. less than 10 dws) that have outline planning permission are to be treated as if they had full permission – i.e. included in the 5YHLS as 'deliverable' by default.

4.3. Clear Evidence

- 4.3.1. The requirement for 'clear evidence' was introduced in the June 2018 revisions to the NPPF and the associated revisions to the PPG. This was a reaction to sites being included in the projected housing land supply trajectory that were allocated and/or had outline planning permission, and were thus assumed to be deliverable in-principle, but which then failed to deliver as projected. This resulted in there being a discrepancy between the number of homes that were expected to be delivered and the number of homes actually delivered in practice. Hence the requirement for the evidence to be 'robust', to add additional surety.
- 4.3.2. It is the latter part of the guidance in the PPG (the last four bullet points) that materially adds to the definition in the NPPF, and which provides examples of what might be considered to be clear evidence.
- 4.3.3. The existence of one or more of the types of types of evidence does not automatically result in there being sufficient clear evidence that a site is deliverable (at the base date) – that conclusion can only be reached following a balanced consideration of all the available evidence, as is evident from the phraseology of the examples.
- 4.3.4. Overall, the requirement is that the evidence to demonstrate that a site is deliverable within the five-year period needs to be clear, firm and robust. If there is doubt as to whether it will, the default position is that the site should be excluded from the 5YHLS.

Current Planning Status

- 4.3.5. Noting that an allocation and/or outline permission is itself insufficient for a site to be included in the 5YHLS, this example is most applicable to sites where an application for full permission or reserved matters approval is being prepared – i.e. an application that will advance the planning status of the site beyond that of an allocation / outline permission.
- 4.3.6. The evidence required is likened to a Planning Performance Agreement (PPA) that includes a timescale for approval of the application and discharge of conditions – i.e. clear, firm and robust information.

Progress towards an Application

- 4.3.7. The reference to an 'application' should be read in the context of the difference in implication of there being an outline or a full permission – progress towards an outline permission (that itself would not be sufficient for a site to be included in the 5YHLS), would obviously not normally be sufficient clear evidence that a site was deliverable.
- 4.3.8. Progress should be viewed as material only if it will advance the planning status of the site beyond that of an allocation / outline permission.
- 4.3.9. In many ways the evidence is similar to that discussed above. Although a PPA is not referenced, the example does refer to a written agreement, that confirms the:
- developer's delivery intentions,
 - anticipated start dates, and
 - build-out rates.
- 4.3.10. In this respect, reliance simply on an agreed projected build-out trajectory is usually insufficient to represent clear, firm and robust evidence that a site is deliverable.
- 4.3.11. A trajectory has to be based on something more than a metaphorical sticking of ones' finger in the air – it should be based on a realistic timescale to progress the site through the remaining legal, planning and construction stages, and consideration of any site-specific requirement.
- 4.3.12. Importantly, this evidence needs to be published by the LPA such that there can be sufficient confidence in the projected trajectory, and there be a realistic prospect of the number of homes projected being delivered. Otherwise the 'evidence' is little more than a 'guesstimate'.

Site Assessment Work / Clear Relevant Information

- 4.3.13. Evidence of site assessment work, site viability, ownership constraints, and/or infrastructure provision can all serve to strengthen confidence that a site is deliverable within the five-year period, but on their own are unlikely to represent sufficient clear, firm and robust evidence.

4.4. Assessment of Sites

- 4.4.1. The 5YHLSS Housing Trajectory breaks down the 5-year supply of sites into the following categories:
- under construction
 - with planning permission (full or reserved matters covering whole site)
 - with outline permission with part(s) covered by reserved matters
 - with outline only
 - where full, outline or reserved matters at post committee resolution subject to S106 negotiations
 - with application submitted
 - with pre-application discussions occurring
 - allocation only
 - draft allocation - zero currently from this source
- 4.4.2. Savills has reviewed the UDC housing trajectory and has identified the supply comprises the following components of supply as shown below in Table 4.1.

Table 4.1: Components of the Five-Year Supply (5YHLSS)

Site Type at 1 st April 2022		Projected Delivery 2022/23 to 2026/27 (dws)
1. Large sites (more than 10 dwellings)	a. Large sites with planning permission	2,691
	b. Large sites – Communal Establishments	167
2. Minor Sites (6 to 9 dwellings)	Minor sites with planning permission	141
3. Small sites (5 or less dwellings)	Small sites with planning permission	647
4. Windfall allowance (for years 4 to 5)		228
Sub Total		3,874
5. Slippage and Non-Implementation Rate at Small Sites less than 6 dwellings		- 239
6. Slippage and Non-Implementation Rate at Communal Establishments		- 75
Total		3,560

Category 1a - Large Sites

- 4.4.3. UDC has incorporated 40 large sites within the housing trajectory amounting to a stated supply of 2,691 dwellings.
- 4.4.4. The following table identifies the sites that only benefit from only outline planning permission and 314 dwellings should be removed if there is no additional clear evidence of delivery. Each site is considered in turn in the table below.

Table 4.2: Sites within the UDC Housing Trajectory - Outline Planning Permission Only

UDC Housing Trajectory Sites with Outline Permission Only			Savills Comments	Savills Conclusion
Sav Ref	Site Address	Projected Delivery 2022/23 to 2026/27 (Dwellings)		
SAV026	Land south of Rush Lane, Elsenham	40	Outline planning permission was allowed at appeal in September 2020. The additional information provided by UDC at Column AG Row 10 of the Housing Trajectory does not constitute clear evidence of deliverability.	Remove from five year supply.

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SAV034	Land To The West Of Buttleys Lane, Dunmow	60	Outline planning permission was allowed at appeal in January 2022. The additional information provided by UDC at Column AG Row 46 of the Housing Trajectory does not constitute clear evidence of deliverability.	Remove from five year supply.
SAV036	Land south of Stortford Road, Dunmow (outline phase of hybrid application)	61	Hybrid application approved in January 2022. The additional information provided by UDC at Column AG Row 24 of the Housing Trajectory does not constitute clear evidence of deliverability in respect of the outline aspect of the application. Reference is made to Reserved Matters submission in June 2022 but no such submission appears to have been made.	Remove 61 dwellings from five year supply.
SAV047	Land South Of Vernons Close Mill Road, Henham	45	Outline planning permission granted in February 2021. The additional information provided by UDC at Column AG Row 44 of the Housing Trajectory does not constitute clear evidence of deliverability. Reference is made to site being sold to a developer who may have alternative plans and timescales for the site.	Remove from five year supply.
Total		206		

4.4.5. The following table identifies the sites which only benefit from only outline planning permission but are subject to other planning applications and should be removed if there is no additional clear evidence of delivery. Each site is considered in turn in the table below.

Table 4.3: Commentary abouts Sites within the UDC Housing Trajectory - Outline Planning Permission and Reserved Matters Pending in December 2022

Sites with Outline Permission and Reserved Matters Pending in December 2022			Savills Comments	Savills Conclusion
Sav Ref	Site Address	Projected Delivery 2022/23 to 2026/27		
SAV027	Land To The West Of, Isabel Drive, Elsenham	99	Outline planning permission granted at appeal in December 2020. Reserved matters application (LPA UTT/21/2461/DFO) validated in August 2021 but still pending. The existence of an application for reserved matters approval on its own does not constitute clear evidence of delivery.	Remove from five year supply.

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			No additional evidence is provided by UDC in the housing trajectory.	
SAV028	Land East And North Of Clifford Smith Drive Watch House Green Felsted	41	<p>Outline planning permission granted at appeal in April 2020.</p> <p>Reserved matters application (LPA UTT/22/3178/DFO) validated in November 2022 but still pending.</p> <p>The existence of an application for the reserved matters approval on its own does not constitute clear evidence of delivery.</p> <p>Additional evidence is provided by UDC in the Housing Trajectory Column AG Row 14 but does not constitute clear evidence of delivery.</p>	Remove from five year supply.
SAV035	Land At Smiths Farm Chelmsford Road Great Dunmow Essex (West of Chelmsford Road)	80	<p>Outline planning permission granted in November 2014.</p> <p>Reserved matters application (LPA Ref: UTT/17/3106/DFO) was submitted in 2017 but still pending.</p> <p>The existence of an application for the reserved matters approval on its own does not constitute clear evidence of delivery.</p> <p>No additional evidence provided by UDC in the Housing Trajectory Column AG Row 23.</p>	Remove from five year supply.
SAV044	Land To The North Of, Stewarts Way, Manuden	22	<p>Outline planning permission granted on January 2021. Reserved matters application (LPA UTT/22/2519/DFO) validated in September 2022 but still pending.</p> <p>The existence of an application for reserved matters approval on its own does not constitute clear evidence of delivery.</p> <p>Additional evidence is provided by UDC in the Housing Trajectory Column AG Row 50 but does not constitute clear evidence of delivery.</p>	Remove from five year supply.
SAV057	Land North Of Shire Hill Farm, Shire Hill, Saffron Walden	100	<p>Outline planning permission granted in July 2020. Reserved matters application (LPA UTT/21/3565/DFO) validated in December 2021 but still pending.</p> <p>The existence of an application for reserved matters approval on its own does not constitute clear evidence of delivery.</p> <p>Additional evidence is provided by UDC in the Housing Trajectory Column AG Row 62</p>	Remove from five year supply.

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			but does not constitute clear evidence of delivery.	
SAV60	Land east of Warehouse Villas, Stebbing Road, Stebbing (market dwellings only)	17	Outline planning permission was granted in February 2022. The additional evidence provided by UDC in the Housing Trajectory makes reference to an reserved matters application that was submitted in October 2022 (LPA Ref: UTT/22/2763/DFO), some 6 months post the base date of the 5YHLSS. The existence of an application for reserved matters approval on its own does not constitute clear evidence of delivery. Further, reference to this application constitutes attempted retrospective justification for the inclusion of the site.	Remove from five year supply.
Total		359		

Large Sites Summary: For the reasons stated above 565 dwellings should be removed from the stated five year housing trajectory from Large Sites. This reduces the supply of sites from large sites to 2,126 dwellings.

Category 1b – Communal Establishments

- 4.4.6. Three sites are incorporated at the end of the housing trajectory relating to communal establishments.
- Site SAV064 benefits from both outline planning permission and reserved matters permission. Discharge of conditions have been approved.
 - Site SAV066 was granted full planning permission in March 2021. Subsequent discharge of conditions applications have been approved.
- 4.4.7. As such SAV064 and SAV066 two sites have a reasonable prospect of delivery within the five year period.
- 4.4.8. Site SAV065 was granted outline planning permission in January 2020 following appeal. Additional evidence is provided by UDC in the Housing Trajectory Column AG Row 99 but does not constitute clear evidence of delivery, thus this site should be removed from the supply.
- 4.4.9. It is Savills position that it is reasonable to include 101 dwellings (or equivalent) within the housing trajectory, removing SAV065 from the supply.
- 4.4.10. However it is noted that the UDC Housing Trajectory spreadsheet row 102 columns J, K and M identify that the supply from communal establishments within the five year period has been adjusted downwards to 56 dwellings from sites SAV064 and SAV066, utilising a reduction factor of 1.8. There is no explanation to this approach provided by UDC. However, it is noted within the Housing Delivery Test Measurement

Rule Book³ (para 11) that “*The ratio applied to other communal accommodation [other than student accommodation] will be based on the national average number of adults in all households, with a ratio of 1.8*” as such this approach is endorsed.

4.4.11. This would reduce the supply to 56 dwellings from communal establishments.

Communal Establishments Summary: Overall it is considered reasonable that 56 dwellings are included within the housing trajectory from communal establishments rather than 92 dwellings suggested by UDC. This approach removes site SAV065 from the supply and is inclusive of the slippage and non-implementation rate.

Category 2 – Minor Sites with Planning Permission

4.4.12. UDC has incorporated 21 sites within the housing trajectory of 6 to 9 dwellings which we are classifying as ‘minor sites’ amounting to 141 dwellings.

4.4.13. UDC has not applied any discount to the minor sites for slippage and non-implementation.

4.4.14. Due to the scale of the proposals, assumptions about delivery are not subject to challenge.

Minor Sites Summary: It is reasonable to include 141 dwellings within the housing trajectory as identified in the 5YHLSS.

Category 3 – Small Sites

4.4.15. UDC has included a supply of small sites delivering 5 or less dwellings amounting to 408 homes.

4.4.16. UDC state within the 5YHLSS:

“18. There are currently 647 dwellings with planning permission on sites delivering 5 or less homes (net), discounting this source to 63% results in 408 homes assumed to be deliverable.”

4.4.17. In terms of assumptions regarding delivery, UDC explain within the 5YHLSS:

“18 ... Small sites with planning permission have been included and are assumed to be completed in the next three years - this is in line with the evidence presented in the windfall allowance paper.”

4.4.18. This is evidenced at paragraph 23 and Table 5 of the Windfall Allowance for Uttlesford Paper (June 2021).

4.4.19. UDC also explain within the 5YHLSS that a lapse rate has been applied of 37%:

“18 ... This source of supply has been discounted to 63% to reflect the evidence around delivery of windfall sites, which is again in line with the evidence presented in the windfall allowance paper ...”

³ MHCLG (2018) Housing Delivery Test Measurement Rule Book

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1012931/HDT_Measurement_Rule_Book.pdf

- 4.4.20. However, as noted previously in this Assessment, The NPPF (paragraph 73) requires that the 5YHLS comprise:

“... a supply of specific deliverable sites ...”

- 4.4.21. UDC has not provided any details of the small sites that make up the projected supply, so it is impossible for Savills to conclude as to whether it is robust. As a strict interpretation of the NPPF / PPG, none of this supply can be included without further evidence; however on this occasion, and noting the approach taken by UDC to small sites, the figure included in the 5YHLSS has been used for the purposes of this Assessment.

Small Sites Summary: It is reasonable to include 408 dwellings within the housing trajectory as identified in the 5YHLSS.

Category 4 – Windfall allowance

- 4.4.22. UDC has incorporated an allowance for windfall delivery of 114 dwellings Years 4 (2025/26) and 5 (2026/27).

- 4.4.23. UDC explain within the 5YHLSS:

“17. It also includes an allowance for windfall sites of 114 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. The evidence for this allowance is set out in the Windfall Allowance for Uttlesford Paper (June 2021) paper available on the Council's website.”

- 4.4.24. UDC published 'Windfall Allowance for Uttlesford' in June 2021. The document considers delivery of windfall sites in the period 2021/11 to 2019/20.

- Table 1 of that document identifies that the annual average windfalls built was 123.3 dwellings.
- Table 2 identifies that an annual average for that period, excluding rural exception sites, was 114.3 dwellings.

- 4.4.25. UDC states at paragraph 18 of the 'Windfall Allowance for Uttlesford' Paper in respect of rural exception sites:

“...Although these sites meet the criteria of being windfall and policy is supportive of such sites it is not possible to be certain over the future delivery of such sites.”

As such UDC concludes at paragraph 27 of the 'Windfall Allowance for Uttlesford' Paper that the 114 dwelling allowance is considered “a realistic allowance”. Overall, Savills agrees with this approach.

- 4.4.26. UDC explain within the 5YHLSS:

“18. To avoid double counting, no allowance for windfall is made in the three years 2022/23 - 2024/25, and all deliverable sites are assumed to have planning permission...”

- 4.4.27. Savills agrees with this approach.

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Windfall Summary: It is therefore considered reasonable to include 228 dwellings within the five year supply as windfall.

4.5. Summary

4.5.1. In summary, Savills considers that amendments are required to the overall 5YHLS as shown in Table 4.4 below.

Table 4.4: Components of the Five-Year Supply

Site Type at 1 st April 2022		Projected Delivery 2022/23 to 2026/27 (dws) (UDC 5YHLSS)	Increase / Decrease	Projected Delivery 2022/23 to 2026/27 (dws) (Savills)
1. Large sites (more than 10 dwellings)	a. Large sites with planning permission	2,691	- 565	2,126
	b. Large sites – Communal Establishments	167	- 66	101
2. Minor Sites (6 to 9 dwellings)	Minor sites with planning permission	141	-	141
3. Small sites (5 or less dwellings)	Small sites with planning permission	647	-	647
4. Windfall allowance (for years 4 to 5)		228	-	228
Sub Total		3,874	- 631	3,243
5. Slippage and Non-Implementation Rate at Small Sites less than 6 dwellings		- 239	-	- 239
6. Slippage and Non-Implementation Rate at Communal Establishments		- 75	-30	-45
Total		3,560	-661	2,959

5. Five-Year Housing Land Supply

5.1.1. The respective UDC and Savills positions for 1st April 2022 can be summarised as set out in the Table 5.1 below.

Table 5.1 Calculation of 5YHLS at 1st April 2022

	Component	Calculation	UDC	Savills
A	Requirement	Section 3	3,638 dwellings	3,638 dwellings
B	Supply	Section 4	3,560 dwellings	2,959 dwellings
C	5YHLS	$(B / A) \times 5$	4.89 years	4.06 years

6. Consideration of Future Supply

6.1.1. Savills has also considered the likely housing land supply position at 1st April 2023. In doing so Savills has considered additional sites that have been granted planning permission in the period 1st April 2022 to date, which would contribute to the supply over the period 1st April 2023 to 31st March 2028.

6.2. Additional Contributions to the Supply

6.2.1. Savills is aware of a number of applications which have received planning permission in the period 1st April 2022 to 23rd March 2023. A list of permissions is attached hereto at **Appendix 1**. This includes Minor Sites, Large Sites, and a Communal Establishment.

6.2.2. The majority of new permissions granted have the benefit of full planning permission and it is therefore anticipated that those sites will deliver within the five year period. The sites which have been granted outline planning permission have been discounted as there is no clear evidence of delivery.

6.2.3. Savills has given consideration to the UDC Housing Trajectory and rolled it forward to relate to 1st April 2023 to 31st March 2028 period and added the additional sites with planning permission.

Table 6.1: Components of the Five-Year Supply

Site Type as anticipated at 1 st April 2023		Projected Delivery 2023/24 to 2027/28 (dws) (Savills)	Savills Commentary	Increase / Decrease
1. Large sites (more than 10 dwellings)	c. Large sites with planning permission	2,282	UDC Housing Trajectory rolled forward with additional full planning permissions at SAV092, SAV095, SAV096, SAV097, SAV114, and SAV122 added. Sites SAV026, SAV027, SAV028, SAV034, SAV035, SAV036, SAV044, SAV047, and SAV057 removed where they only benefit from outline permission at the base date.	- 648
	d. Large sites – Communal Establishments	220	UDC Housing Trajectory rolled forward with additional permission SAV098 added. SAV065 removed as only benefits from outline permission.	- 66
2. Minor Sites (6 to 9 dwellings)	Minor sites with planning permission	71	UDC Housing Trajectory rolled forward with additional full planning permissions at SAV091, SAV099, SAV107 added.	-

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3. Small sites (5 or less dwellings)	Small sites with planning permission	647	No published data by UDC so 2022 data applied.	-
4. Windfall allowance (for years 4 to 5)		228	No published data by UDC so 2022 data applied.	-
Sub Total		3,448		
5. Slippage and Non-Implementation Rate at Small Sites less than 6 dwellings		- 239	No change.	-
6. Slippage and Non-Implementation Rate at Communal Establishments		-98	1.8 ratio applied as per UDC Housing Trajectory	-
Sub Total		-337		
Total		3,111		

6.2.4. This results in the following overall calculation of the future 5YHLS:

Table 6.2 Anticipated Calculation of 5YHLS at 1st April 2023

	Component	Calculation	Savills
A	Requirement	Section 3	3,587 dwellings
B	Supply	Section 4	3,111 dwellings
C	5YHLS	(B / A) x 5	4.34 years

7. Summary & Conclusion

7.1. Summary

- 7.1.1. This assessment of the 5-Year Housing Land Supply (5YHLS) in Uttlesford has been undertaken by Savills (UK) Ltd on behalf of the Countryside Partnerships PLC.
- 7.1.2. The latest assessment of the five year housing land supply (5YHLS) in Uttlesford is that published by Uttlesford District Council (UDC) and associated housing trajectory in December 2022 relating to the position at 1st April 2022. The Uttlesford District Council 5 Year Land Supply Statement concludes that UDC is able to demonstrate a housing land supply of 4.89 years.
- 7.1.3. This assessment by Savills is based on the content of the UDC 'Five Year Land Supply Statement and Housing Trajectory' for the period 1st April 2022 to 31st March 2027.
- 7.1.4. Given the Uttlesford Local Plan was adopted in 2005 it is necessary to use the Standard Method for the calculation of Local Housing Need to establish the requirement for the period. UDC has calculated this to be 693 dwellings per annum. The Housing Delivery Test Results for 2021 require the application of a 5% buffer which takes the requirement to 3,638 dwellings for the period. Savills agrees with this calculation.
- 7.1.5. UDC has calculated the supply for the period to be 3,560 dwellings, a deficient of 78 dwellings. This equates to a housing land supply of 4.89 years.
- 7.1.6. Savills has calculated the supply for the period to be 2,959 dwellings, a deficit of 679 dwellings. The disputed sites are identified in section 4 of this report. **This equates to a housing land supply of 4.06 years.**

7.2. Consideration of Future Housing Land Supply Position

- 7.2.1. UDC is required to publish an updated housing land supply report based at 1st April 2023, once available a further review of UDC's evidence would need to be completed at that time it is published to ascertain whether it is robust.
- 7.2.2. In the meantime Savills has considered available information to project forward the likely supply position as at 1st April 2023 to 31st March 2028.
- 7.2.3. Given the Uttlesford Local Plan was adopted in 2005 it is necessary to use the Standard Method for the calculation of Local Housing Need to establish the requirement for the period. Savills has calculated this to be 684 dwellings per annum. The Housing Delivery Test Results for 2021 require the application of a 5% buffer. The Housing Delivery Test Results for 2022 are not yet available, as such a 5% buffer has continued to be applied. This takes the requirement to 3,587 dwellings for the period.
- 7.2.4. Savills has calculated the supply for the period to be 3,111 dwellings, when compared to the 3,587 dwelling requirement, a deficient of 476 dwellings. **This equates to a housing land supply of 4.34 years.**



Appendix 1

New Planning Permissions 1st April 2022 to 31st March 2023

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Table A.1 – Sites granted Planning Permission – 1st April 2022 to 31st March 2023

SAV Ref	Site Address	Description of Development	Capacity (Dwellings)	LPA Reference	Date of Decision	Savills Commentary
Minor Sites						
SAV091	Old Cottage Start Hill Stane Street Great Hallingbury Bishops Stortford CM22 7TG	Proposed erection of 7 no. dwellings including the closure of existing access, creation of new access and associated infrastructure.	7	UTT/21/3339/FUL	28/07/2022	
SAV099	Land North Of Bonningtons Latchmore Bank Little Hallingbury	Proposed erection of 9 no. dwellings and associated development.	9	UTT/22/1063/FUL	02/08/2022	There was a scheme proposed as an alternative for this for 4 dwellings (UTT/22/1049/FUL) approved on 08/08/2022
SAV107	Land At The Former Takeley Service Station Dunmow Road Takeley Essex CM22 6SP	Proposed redevelopment of the Dunmow Road Car Park to provide 8 no. Dwellings including associated parking and landscaping works.	8	UTT/22/2185/FUL	02/11/2022	
Minor Sites Sub Total			24			
Large Sites						
SAV092	Lea Hall Dunmow Road Hatfield Heath CM22 7BL	Proposed refurbishment of Lea Hall including the addition of new detached garage and detached swimming pool	11	UTT/19/3173/FUL	24/06/2022	

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		building. Conversion of barns and cottage to 8 no. Dwellings. Demolition of existing stables to be replaced by 3 no. Dwellings with cart lodges and associated landscaping.				
SAV09 3	Land West Of Hall Road Elsenham Essex	Full planning application comprising a residential development for 130 dwellings (including affordable housing); the provision of open space; play areas; car parking; new pedestrian linkages; landscaping and ancillary works, with access off Hall Road, and the change of use of 0.371ha of agricultural land for educational use.	130	UTT/19/0462/FUL	27/07/2022	
SAV09 4	Land At Sunnybrook Farm Braintree Road Felsted Essex	Construction of 24 no. dwellings and school related community car park served via a new access from Braintree Road, complete with related	24	UTT/20/1882/FUL	19/08/2022	

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		infrastructure and landscaping				
SAV09 5	Land Rear Of Malt Place Cornells Lane Widdington CB11 3SP	Demolition of five existing buildings, and erection of three new buildings forming 10 residential dwellings. Alternative scheme to that approved under references UTT/20/2154/FUL , UTT/20/0876/FUL and UTT/20/3016/FUL	10	UTT/21/2649/FUL	05/09/2022	
SAV09 6	Land North Of Cox Ley Cox Ley Hatfield Heath	Erection of 12 no. dwellings including new access and associated landscaping. Creation of parking area for adjacent playing field.	12	UTT/20/0422/FUL	17/10/2022	
SAV09 7	Land North Of Braintree Road Dunmow	Proposed erection of 32 no. self build and custom build dwellings	32	UTT/21/2719/FUL	04/11/2022	
SAV11 4	Former Friends School Mount Pleasant Road Saffron Walden Essex CB11 4AL	Conversion of buildings and demolition of buildings to allow redevelopment to provide 96 dwellings, swimming pool and changing facilities, associated recreation	96	UTT/22/1040/PINS	1/10/2022	Section 62A Application

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		facilities, access and landscaping.				
SAV12 0	Moors Fields Station Road Little Dunmow Essex	Outline planning application (with all matters reserved except for means of access from Station Road) for residential development of up to 160 dwellings	0	UTT/21/3596/OP	02/03/2023	Whilst the site benefits from outline planning permission no additional evidence has been provided to demonstrate delivery within the five year period.
SAV12 1	Helena Romanes School, Parsonage Downs, Great Dunmow CM6 2AU	Outline planning application for up to 200 dwellings, demolition of existing school buildings, public open space, landscaping, sustainable drainage system and vehicular access from the B1008 Parsonage Downs. All matters reserved except for means of access.	0	UTT/20/1929/OP APP/C1570/W/22/329606 4	13/03/2023	Whilst the site benefits from outline planning permission no additional evidence has been provided to demonstrate delivery within the five year period.
SAV12 2	Land at 'Venn House', Tenterfields , Great Dunmow CM6 1HH	The demolition of existing buildings and construction of 12 no. residential dwellings (Use Class C3) with associated landscaping, access, and infrastructure	12	UTT/21/0245/FUL APP/C1570/W/21/328965 0	04/01/2023	
SAV12 3	Land South Of (East Of Griffin Place)	Outline application for the erection of up to 233 residential	0	UTT/21/2509/OP APP/C1570/W/22/329642 6	05/10/2022	Whilst the site benefits from outline planning permission no

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	Radwinter Road Swards End Essex	dwelling including affordable housing, with public open space, landscaping, sustainable drainage system (SuDS) and associated works, with vehicular access point from Radwinter Road. All matters reserved except for means of access				additional evidence has been provided to demonstrate delivery within the five year period.
Large Sites Sub Total			327			
Communal Establishments						
SAV098	Land South Of Radwinter Road (former Printpack Site) Saffron Walden	Demolition of existing buildings and erection of a discount foodstore, a 70 bed care home and 49 no. retirement living apartments with access, car parking, landscaping and associated works.	119	UTT/20/2007/FUL	21/12/2022	With slippage and non-implementation rate this reduces to 66 units
Communal Establishments Sub Total			119			
Slippage and non-implementation Rate			-53			
Total			417			

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