



**TOWN AND COUNTRY PLANNING ACT 1990**

**PROPOSAL**

**Consultation on S62A/2023/0023 – Proposed erection of 5 no. residential dwellings and associated infrastructure.**

**AT**

**Eastfield Stables, May Walk, Elsenham Road, Stansted, Essex.**

**REPRESENTATION OF UTTLESFORD DISTRICT COUNCIL  
FOR THE RECENT UPDATES OF THE  
NATIONAL PLANNING POLICY FRAMEWORK AND THE  
HOUSING DELIVERY TEST**

PLANNING INSPECTORATE REF: S62A/2023/0023

LOCAL PLANNING AUTHORITY REF: UTT/23/2193/PINS

## 1.0 Comments on updated National Planning Policy Framework

- 1.1 Following the latest revision of the National Planning Policy Framework (NPPF) in December 2023, the paragraphs of the NPPF referenced in the officer's report, the covering letter and any other documents submitted by Uttlesford District Council shall be updated as follows to correspond with the new numbering:

Superseded NPPF (September 2023)	Revised NPPF (December 2023)
8	8
11	11
39	39
43	43
57	57
79	83
80	84
104	108
110	114
111	115
119	123
120	124
125	129
130	135
159	165
167	173
169	175
174	180
180	186
192	198
219	225

## 2.0 Comments on updated Housing Delivery Test

- 2.1 Notwithstanding the references in the officer's committee report or elsewhere for a 5-Year Housing Land Supply (5YHLS) of **5.14 years** with a 5% buffer (see paragraph 13.3.1 of the officer's report), which was updated in October 2023, there is a more recent position that reflects the government update of the Housing Delivery Test (HDT).
- 2.2 The new position regarding the 5YHLS is analytically explained in **Appendix 1**.
- 2.3 As a result of the recent updates in the HDT, for the most recent HDT period (01 April 2019 to 31 March 2022) housing completions within the district made up **58%** of the required number of homes (in comparison to 99% in the previous period). Whilst a significant number of residential permissions have been granted in recent years, many have not yet been built and so are not accounted for in the backwards looking HDT.
- 2.4 Following paragraph 79(c) of the updated NPPF, a 20% buffer must be added to the local planning authority's housing requirement. This means that the Council's current 5YHLS figure is **4.50 years** (instead of 5.14 years). As the Council cannot demonstrate a 5YHLS that includes a 20% buffer, the presumption in favour of sustainable

development under paragraph 11(d) of the NPPF is engaged when determining applications for residential development within the district.

- 2.5 However, the same presumption was applied in the officer's committee report anyway given that the Council's Development Plan cannot be viewed as being fully up to date (see paragraph 13.3.1 and Section K of the officer's committee report). Despite the 5YHLS shortfall identified above, given the limited number of dwellings proposed, the weight to be afforded to the development's contribution to the district's housing supply would still be limited and the adverse impacts of the proposal would still significantly and demonstrably outweigh the benefits. The proposal would not be sustainable development for which paragraph 11(d) of the NPPF indicates a presumption in favour.

**APPENDIX 1 – UTTLESFORD 5YHLS STATUS FOLLOWING HDT PUBLICATION**

(see separate document)