

**From:** Planning <planning@uttlesford.gov.uk>  
**Sent:** Tuesday, August 13, 2024 4:49 PM  
**To:** Section 62A Applications <section62a@planninginspectorate.gov.uk>  
**Cc:** [REDACTED]  
**Subject:** S62A/2024/0049

Dear Leanne

We are contacting you in respect of the section 62a (Ref. S62A/2024/0049) which is for: *Application for approval of matters reserved (layout, scale, landscaping, and appearance) pursuant to Appeal Decision ref: APP/C1570/W/22/3311069 (up to 50 market and affordable dwellings, public open space and associated highways and drainage infrastructure – all matters reserved except for access.*

As per your request below and in respect of the proposed changes to the NPPF which is open for consultation we have the following comments in respect of the above application:

- We support the revised wording to paragraph 11(d)(ii). The Council has not been able to demonstrate a 5 year housing land supply and the presumption in favour of sustainable development is in place. We have found several schemes have been submitted including this site which is proposing a low quality development (due in part to the affordable housing cluster around the apartment block which is acting as a buffer to the noise from the M11) and this should not be granted.
- We support the changes to new paragraph 135 in respect of Uttlesford's new District Wide Design Code SPD in that this should be the primary means of assessing and improving the design of developments in line with national guidance. This will help to ensure high quality schemes and help to provide guidance to refuse proposals which are not high quality, like this proposal.
- We support any increase in the provision of affordable housing (particularly affordable rent) and the provision of a mixed tenure site. As per the suggested wording in paragraph 69 this proposal does not deliver a mix of tenures with all the affordable housing as flats in one part of the site.

Furthermore, we have the following comments in respect of the proposed changes to how housing supply will be calculated.

The Government's proposed (draft) changes to the Standard Method calculation for Uttlesford, would result in an additional 74 dwellings per annum, totalling 749.

However, alongside the proposed changes to the Standard Method, the Government is proposing to introduce transitional arrangements (paragraph 226 of the draft NPPF for consultation) whereby Local Authorities which have reached the Regulation 19 stage of the plan-making process can proceed on the basis of their original Standard Method figure, so long as this is not 200 or more dwellings less than the new Standard Method figure.

These draft arrangements (as of the Regulation 19 Plan publication 08/08/24) would apply to Uttlesford and therefore, the Council's draft Local Plan will be submitted for examination based on the original Standard Method figure of 675 per annum. Subject to the Local Plan's adoption, the original Standard Method figure would become the adopted housing requirement for Uttlesford, against which the 5-Year Housing Land Supply would be tested. In this context, the emerging proposed higher Standard Method figure would apply only temporarily for solely development management purposes and

would be at odds with the annual housing requirement that is being planned for in full through the draft Local Plan, including a substantive buffer.

It is also pertinent that as the Council has published its Regulation 19 Local Plan for consultation, including a policy map and proposed allocations, the provision of the current paragraph 226 of the NPPF is engaged which reduces the housing land supply requirement to four-years (including a 20% buffer). The Government is presently consulting on changes to the NPPF which would remove this provision, and it is not currently known when this change may occur in relation to the determination of this application, or if the proposed changes will proceed in an amended form following the consultation feedback.

Taking account of the likely temporary nature of both the 4-Year Housing Land Supply proviso and the new Standard Method figure, the changes proposed to national policy in relation to housing need and supply are not considered to alter the Council's position in relation to the S62A application.

We would be grateful if you could confirm receipt of this email.

Thanks

Tim Cakebread  
Principal Planning Officer