

UTTLESFORD DISTRICT COUNCIL

Extraordinary Council Meeting – The Local Plan 30th April 2020

My name is Richard Haynes. I am a former Chartered Surveyor who specialised in advising central and local government on property valuation and development viability.

The history of Plan making in Uttlesford is not good. This is of course due, in part, to the difficulties created by unrealistic central government policy which has sought to impose more housing on rural communities than they can satisfactorily accommodate. The flaws and inadequacies in the previous Regulation 19 draft however were so obvious that it was almost inevitable that they would lead to a second rejection at an Examination in Public.

The examining inspectors found fault in many areas but principally in relation to:

- The Spatial Strategy analysis;
- The lack of assurance on Garden Community principles;
- Transport and other infrastructure;
- Heritage sensitivities;
- The fact that the boundaries of development areas were not clearly defined; and
- The viability analysis.

These issues are so fundamental in establishing the soundness of the Plan that I cannot see how as a council, you can do anything other than start afresh.

The Garden Communities were clearly perceived as an easy solution to the housing need where single landowning developers could be left to 'get on with it'. Sadly, Garden Communities cannot be created in that way. They require a level of master-planning, infrastructure assessment and viability analysis way beyond what was undertaken for the Regulation 19 stage. A complete understanding of the detail is necessary if they are to form the basis for housing allocations in Plan policy for the next 20 years.

It is clear that there is still some resistance to withdrawing the Plan. This is partly due to the amount of resource that has already been applied to the development of it. I suspect, however, that it is also due to reluctance on the part of councillors whose wards have previously got off lightly to subject their constituents to the uncertainty of a new spatial strategy.

There also seems to be a general view that by fiddling with the current draft an historic level of housing need can be maintained. As the Peer Review study (and the Inspectors' letter) points out however there will be a need for re-appraisal whatever happens. First, the Plan period will have to be extended meaning that the projected 10 year average growth will be using a different base; and secondly, it is inevitable that new guidance and new data will emerge over the Plan development period and which will have to be taken into account.

It is therefore worth considering what might emerge over the next two or three years. The current household growth projections used as the baseline for establishing housing need relate to 2014 data. A re-appraisal of that data is (or perhaps was) anticipated this year. Given that 2014 was pre-Brexit and that according to the Office for National Statistics, 37% of household growth is due to net international migration, this element of the growth could reduce significantly.

It is also interesting that the recent paper 'Planning for the Future' published by the MHCLG refers throughout to building 'within and near to urban areas'. It may be that this heralds a new approach to satisfying housing need and a realisation that effectively allocating huge amounts of development to rural authorities ill-equipped to accommodate it, is neither sustainable nor practical. I, and others, have been arguing for some time that attempts to increase supply in high value areas (through the Step 2 affordability adjustment to the standard method of assessing housing need) will not bring down house prices. Building more houses simply increases demand for both materials and skilled labour leading to cost-push inflation in the housing market while developers will in any case, regulate the housing build-out rate so as to at least maintain prices at current levels. Perhaps that message is at last getting through to politicians and civil servants and we may see a change of policy which ultimately reduces housing need in areas like Uttlesford.

After the failure of the Stansted Airport planning application and the current crisis in the airline industry it will in any case be hard to argue for airport related growth.

I do not see therefore, that there can be any justification for trying to work any further with the current draft and that a fresh start is the only option.