
EXAMINATION STATEMENT – MATTER 2

Harlow Local Development Plan

Representations on behalf of
Redrow Homes

March 2019

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HARLOW LOCAL DEVELOPMENT PLAN

**REPRESENTATIONS ON BEHALF OF
REDROW HOMES**

MARCH 2019

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore LLP on behalf of our Client, Redrow Homes, who has an interest in land to the south of Moor Hall Road, hereafter referred to as “the Site”.
- 1.2 The Site forms a land parcel and is located within the wider Strategic Housing Allocation to the East of Harlow (ref. HS3) in the submitted Local Plan. The allocation provides for 2,600No. dwellings and associated infrastructure as forming one of the new Garden Communities in the Harlow and Gilston Garden Town.
- 1.3 Representations have been made on behalf of our Client during the production of the Local Plan. Our representations to the Reg 19 Pre-Submission Publication Local Plan were supportive of the Plan (and the Site allocation), however, we sought to provide commentary on some areas of the Plan for which we did not consider to be sound. These aspects are addressed again in matter statements to the Examination of the Local Plan.
- 1.4 Notwithstanding the land interests of our Client, these representations have been prepared in recognition of prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.5 The Local Plan was submitted during the period for when transitional arrangements for applying the 2012 NPPF were in place. Reference is therefore made to the 2012 NPPF in responses to the Inspector’s questions, unless otherwise stated. These representations respond to the Inspector’s questions within Matter 2 and have been considered in the context of the tests of ‘Soundness’ as set out at Para 182 of the NPPF which requires that a Plan is:
- **Positively Prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

2.0 RESPONSE TO MATTER 2 – HOUSING PROVISION

Topic: Housing – Quantitative Requirements, Overall Provision and Five-Year Supply.

Question 2.6 – Five Year Supply

Does the Plan provide for a five-year supply of deliverable housing sites against the housing requirement? Is an allowance made for the non-implementation of commitments, and if not, should one be? Is the housing trajectory, for individual sites and all the allocation sites combined, realistic?

- 2.1 The Council's 5-year supply methodology contains two assessments of the supply as including both a 5% and 20% buffer. We consider that the methodology should be based solely on a 20% buffer in accordance with the NPPF.
- 2.2 The NPPF sets out that where there has been a persistent record of under-delivery, the buffer should be 20% to provide a realistic prospect of achieving planned supply and ensuring choice and competition in the market for land.
- 2.3 Delivery in Harlow since the beginning of the proposed Plan period (2011/12) has fallen significantly below of the requisite target. This is evidenced in the table below.

Table 1: Annual Dwelling Delivery (2011/12 – 2016/17)

Year	Annual Dwelling Target	Annual Dwelling Completion
2011/12	418	389
2012/13	418	152
2013/14	418	126
2014/15	418	204
2015/16	418	225
2016/17	418	340
Total	2,508	1,436 (1,072 shortfall)

- 2.4 The table demonstrates persistent under delivery therefore justifying the need for a 20% buffer – in order to address the supply going forward.

- 2.5 The Council's assessment of the 5-year supply results in 5.2 years. This does not provide an appropriate amount of flexibility in terms of the potential for lapse rates/non-implementation of sites for which allowance is not made (but should be) in the supply. We consider that a 10% reduction should be factored in to the supply for delivery either being delayed beyond the five-year period or not being implemented.
- 2.6 Furthermore, we consider there to be uncertainty on the delivery of specific allocated sites within the first five years (as per the Council's trajectory). These are:

Table 2: Allocated Sites Not Considered Deliverable in 5-Year Period

Site Allocation	Dwellings	Proposed Start	Reasons for delivery outside 5-year period
Evangelical Lutheran Church (HS2-8)	35	2020/21	Site includes existing church/community use. Delivery within 5 years is therefore not considered likely.
Pollard Hatch (HS2-10)	20	2020/21	Site includes existing uses including takeaway food outlet and newsagents with flats above. Delivery within 5 years is therefore not considered likely.
Slacksbury Hatch (HS2-17)	10	2019/20	Site includes newsagents and other retail uses. Delivery within 5 years is therefore not considered likely.
Total	65		

- 2.7 Having regard to our recommended 10% lapse rate/non-implementation and the position regarding the three allocated sites above (table 2), we undertake (below) our assessment of the Council's five-year supply, utilising the Council's methodology.

Table 3: Harlow Five Year Requirement (as per Council's Assessment)

a.	Plan period requirement	9,200
b.	Annual requirement	418
c.	Five Year requirement	2,091
d.	Undersupply 2011 – 2017 (see table 1)	1,072
e.	Five Year requirement + undersupply	3,164
f.	Annualised requirement with undersupply	633
g.	20% buffer	633
h.	Five Year Requirement (f x 5 +g)	3,798

Table 4: BW Assessment of Five-Year Supply

i.	Proposed allocations (2016 - 2021)	506
j.	Commitments	3,416
k.	Total HDC supply	3,922
l.	10% lapse rate (BW addition)	392
m.	Deductions per table 2 above (BW addition)	65
n.	Total deductions (l + m)	457
o.	Total supply (k – n)	3,465
p.	Five-year supply (o / p)	4.5 years

- 2.8 The above, demonstrates that the Council is only able to demonstrate a 4.5-year supply of housing land. For the Plan to be sound, it will therefore be important to deliver small sites which are ready to be delivered within the first five years of the Plan. This can also include increasing densities at allocated sites which are able to be delivered early in the Plan period.
- 2.9 It is recommended that the Council seeks to secure a supply ranging from 5.5 – 6 years (as a minimum). This will provide appropriate flexibility in terms of delivery of sites early in the Plan period.