# Housing Land Supply Monitor April 2023 to March 2024











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## 1. Introduction

- 1.1 The previous Conservative Government published the latest version of the National Planning Policy Framework (NPPF) in December 2023. The new Government published a revised NPPF for consultation during Summer 2024, however, for the purposes of this document the December 2023 published version is referenced.
- 1.2 Paragraph 76 of the December 2023 NPPF concerning maintaining supply and delivery states:

"Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if the following criteria are met:

- a) their adopted plan is less than five years old; and
- b) that adopted plan identified at least a five-year supply of specific, deliverable sites at the time that its examination concluded.
- 1.3. The Council has an adopted plan which is less than five years old which demonstrated more than a five-year supply of deliverable sites, consequently we are not required to identify deliverable sites sufficient to provide a minimum of five years' worth of housing. However, for the purposes of this monitor we have indicated the current five-year land supply.
- 1.4. This Housing Land Supply Monitor update and trajectory have been produced to provide a more detailed position statement regarding Harlow's housing land supply situation than is available in the published Authority Monitoring Reports.
- 1.5. The Harlow Local Development Plan <sup>1</sup>was adopted in December 2020. The Plan's housing requirement is 9,200 homes from 2011 to 2033. At the time of adoption, the housing land supply situation indicated that there was a six-year supply of housing land for 2011 to 2033<sup>2</sup>.
- 1.6. The Monitor sets out in more detail the land supply situation for 1 April 2023 to 31 March 2024 and recalculates the five-year land supply position.
- 1.7. Since the publication of the Monitor for 2021- 2022 period, there have been several documents and policies produced that will have a bearing on the trajectory going forward. These documents have identified further land supply that have now been introduced into the trajectory.
- 1.8. This housing monitor supplements the published Authority Monitoring Report for 2023-2024 which is published on the Council's website<sup>3</sup>, however it does not include the results from the latest Housing Delivery Test (2023) which will be published on the Council's website as soon as it is received.

<sup>&</sup>lt;sup>1</sup> Harlow Local Development Plan 2020

<sup>&</sup>lt;sup>2</sup> Based on a stepped trajectory – see Harlow Local Development Plan

https://www.harlow.gov.uk/planning-and-building-control/planning-policy/authority-monitoring-reports

# 2. Adopted Harlow Local Development Plan

- 2.1. The Harlow Local Development Plan (HLDP) was adopted in December 2020. The Plan sets out a housing requirement of 9,200 over the Plan period from 2011 to 2033, a significant uplift on the objectively assessed housing need of 7,400 dwellings calculated in the Strategic Housing Market Assessment 2017. This uplift was to help achieve regeneration of the town and improve affordability of housing.
- 2.2. Following modifications agreed by the Inspector after the Examination in Public, a stepped trajectory requirement was established of 361 dwellings per annum between April 2011 and March 2024 and a requirement for 501 dwellings per annum from April 2024 to March 2033. The stepped trajectory acknowledged the contribution to land supply made by larger housing sites that would be delivered in the latter stage of the plan period because of the complexities associated with the size of the developments and level of infrastructure required to bring them forward.
- 2.3. The Inspector said in his report to the Examination:

The sites identified as suitable for housing within the district include a large strategic site east of Harlow, land at Princess Alexandra Hospital and further development at Newhall. However, the lead time to bring forward these sites, particularly the site east of Harlow, means a stepped requirement for the 9,200 dwellings is both necessary and justified. On this basis 361 dwellings should be provided each year in the period 2011-24 and 501 dpa between 2024-33.

- 2.4. The Local Plan identified a dwelling requirement of 9,200 during the Local Plan period. There were 2,463 dwellings completed during the period of 1 April 2011 to 31 March 2019 and an additional 4,723 dwellings had planning permission. This left a residual requirement of 2,014 dwellings to be provided.
- 2.5. The Strategic Housing Site East of Harlow (forming part one of the four new Garden Communities in the Harlow and Gilston Garden Town) will provide 2,600 dwellings in Harlow during the Local Plan period. A further 834 dwellings will also be provided through further site allocations identified in the Local Plan. This totals 3,434 dwellings which is 1,420 dwellings more than the residual requirement of 2,014. This overage was to provide an element of flexibility should some sites not come forward or their capacity was less than expected. Table 1 below is an extract from the Local Plan which sets this out.

Completions at 31 March 2019	2,463
Commitments at 31 March 2019	4,723
Strategic Housing Site East of Harlow	2,600
Policy HS2 sites	834
TOTAL SUPPLY	10,620
Surplus over 9,200 requirement	1,420

Table 1 – Extract from Harlow Local Development Plan showing dwelling supply

## **Local Plan Five-year Supply**

2.6. Following the Examination period for the Local Plan, the Inspector agreed that the Sedgefield approach for dealing with under-supply was appropriate for Harlow. An extract from the Inspector's report is below:

The five-year housing land supply position as at March 2019, using the Sedgefield method to deal with past under-delivery and taking account of the stepped requirement, is 6.0 years supply. With a persistent shortfall of 425 completions having built up over the plan period to 2019, the requirement for the 2019-24 period including a 20% buffer is 2,676 dwellings. The projected supply during the five-year period is 3,229 dwellings including 2,981 dwellings from 24 sites with planning permission and 248 dwellings from the new allocations made in this plan. As a planned new town relatively few windfall sites come forward, so no allowance is made for these and with most of the committed sites already under construction there is no need to apply a lapse rate in this case.

- 2.7. The Adoption of the Local Plan "fixed" the housing requirement at 9,200 dwellings and the annual dwelling requirement at 361 and 501 dwellings over a five-year period or 2,085 dwellings overall
- 2.8. This monitor moves the land supply situation that was fixed in the Local Plan forward four years to March 2024.

# 3. Housing Land Supply 2023 to 2024

- 3.1. This monitor updates the land supply situation to March 2024 with the development progress at that time including new completions and commitments up to 31 March 2024. It then recalculates the five-year supply and sets out a detailed trajectory for the remainder of the Plan period.
- 3.2. There have been several documents and policies produced that have a bearing on the trajectory going forward. These documents have identified further land supply that has been introduced into the trajectory. These documents include adopted Supplementary Planning Documents, and a Cabinet endorsed council house building program.
- 3.3. This approach is supported by both the NPPF and NPPG<sup>4</sup> for both deliverable (0-5 years) and developable (6-10 years) sites.
- 3.4. 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 5 years. For a site to be considered developable, it should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged. Deliverable and developable sites which are not commitments or Local Plan allocations are set out in Appendix A with a description as to why these sites have been included
- 3.5. Although the Council is not required to provide a five-year supply as it meets the current NPPF criteria (see paragraph 1.2 and 1.3 above), this monitor still sets out the current five-year supply position for Harlow. This will help inform the AMR. It uses NPPF Annex 2: Glossary's definition of 'deliverable' housing units, using the NPPG's examples of evidence to demonstrate deliverability, where necessary.
- 3.6. The information in this document will be used for decision-making purposes when determining planning applications or appeal inquiries for residential development.
- 3.7. It should be noted that this update is not an Annual Position Statement (APS) as referred to in Paragraph 78 of the 2023 NPPF and therefore does not follow a notification of intention to submit an APS to the Planning Inspectorate (PINS).

# **Housing Delivery Test**

- 3.8. For the 2019-2020 Housing Delivery Test, homes delivered exceeded the test criteria by 34% and consequently no buffer was required.
- 3.9. The results were published for the 2020-2021 Housing Delivery Test<sup>5</sup>, where it indicated there were no consequences as the number of homes delivered is more than double the requirement.
- 3.10. At time of publication of this Monitor the Housing Delivery Test results for Harlow had not been published but is expected early in the new year (2025) and will cover the period up to 2023.

<sup>&</sup>lt;sup>4</sup> Paragraph: 020 Reference ID: 68-020-20190722 of National Planning Policy Guidance

<sup>&</sup>lt;sup>5</sup> https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement

## **Baseline Data – Completions to 2023**

- 3.11. The housing requirement of 9,200 remains as the baseline of the supply calculation until the Local Plan is reviewed. This is an annual requirement of 418 dwellings per annum, however as explained above this has been split (stepped trajectory) into 361 dwellings per annum up to 2024 and 501 dwellings per annum for the remainder of the plan period.
- 3.12. Table 3 shows the cumulative total of net dwelling completions in Harlow from the beginning of the Plan period. National Guidance stipulates that any shortfall in the housing supply is calculated from the base date of the Plan. Table 3 also shows the cumulative shortfalls over this period.

Year	Completions	Cumulative Completions	Difference from requirement	Cumulative Difference
2011-2012	389	389	28	28
2012-2013	152	541	-209	-181
2013-2014	126	667	-235	-416
2014-2015	204	871	-157	-573
2015-2016	225	1,096	-136	-709
2016-2017	340	1,436	-21	-730
2017-2018	281	1,717	-80	-810
2018-2019	676	2,393	315	-495
2019-2020	725	3,118	364	-131
2020-2021	535	3,653	174	43
2021-2022	416	4,069	55	98
2022-2023	560	4,629	199	297
2023-2024	436	5,065	75	372

Table 3 – Housing completions and cumulative differences

- 3.13. As table 3 shows there had been a consistent shortfall in the number of completions against the Local Plan requirement up until 2018 when the shortfall was beginning to reduce as strategic sites (from the previous Harlow Local Plan 2006) had begun to build out.
- 3.14. Whilst there was a peak of completions in the 2019-2020 period this has slowed down, probably due to the impact of Covid on the development sector. There has since been an increase in completions which is down to the build out of apartment blocks in both the town centre and Edinburgh Way and the steady completions at Newhall and Gilden Park. There has however been a drop in completions in this monitoring year.

#### Five-year Housing Land Supply 31 March 2024

3.15. The five-year supply calculation using the annual requirement set out in the adopted plan at 31 March 2024 is set out in table 4:

а	Requirement to be delivered in plan period	9200
b	Completions since start of plan	5065
С	Residual to be delivered over remaining plan period [a-b]	4135
d	Annual requirement over plan period [a/22]	418
е	Stepped Five-year requirement (501x5)	2505
f	Under/Over Supply since start of plan 2011-2024	-372
g	Five-year requirement plus under or over supply [e+f]	2133
h	Annualised figure with under or over supply [g/5]	427
i	Total 5-year requirement	2133
j	Proposed allocations & Other sites (24/25 to 28/29)	375
k	Commitments	1872
I	Total Five-Year Supply [j+k]	2247
m	Percentage Achievable [i/l*100]	105%
n	Years Supply [i/5=annual: I/annual]	5.27 years

Table 4 - Five-year supply calculation: March 2024

3.16. The calculation indicates that there is a 5.27-year supply of deliverable housing.

## Land Supply 31 March 2024

- 3.17. As set out in the Harlow Local Development Plan the overall housing requirement over the plan period 2011 to 2033 is 9,200 dwellings. The Housing Trajectory set out in Appendix A indicates that with housing completions from 2011 to 2024 and housing commitments to 2033 and other development sites, the housing supply is 9,303 dwellings.
- 3.18. This means there is a small oversupply on the Local Plan's requirement of 103 dwellings. This represents 100.33% of the requirement. A surplus on the requirement is something that will be closely monitored over the remainder of the Plan period through the Council's Authority Monitoring Reports.
- 3.19. The reduction in oversupply compared to the Adopted Plan's has in the main been caused by sites not coming forward at the pace anticipated in the Local Plan. In particular the strategic site to the east of Harlow, where expected completions have now moved well beyond the plan period. An oversupply against the requirement is a useful buffer should sites underperform over the remainder of the Plan period.

## 4. Conclusions

- 4.1. The total supply for housing delivery for the five-year period from 1 April 2024 to 31 March 2029 is 2,247 dwellings. The total land supply for the remainder of the Plan period is 4,238 dwellings.
- 4.2. The figure of 4,238 dwellings over the Plan Period is over 1,000 dwellings less than what was expected to be delivered over the Plan Period in the 2022/23 Supply Monitor. This has therefore affected the over-supply figure which is now only 103 compared to 671 dwellings last year.
- 4.3. Committed and allocated sites (in particular the strategic site east of Harlow) as well as some larger planning consents (such as Strawberry Star in the town centre) have not delivered as quickly as was anticipated in the Local Plan and at the point consent was given. This has not been as a result of a lack of planning permissions being granted or Local Plan delay, but due in the main to the development industry not being able to deliver sites or choosing not to build out the sites either for economic or other reasons. For example, this could be as a result of increases in materials cost, shortage of labour in the market, viability constraints or landownership delivery issues. The Council and wider Garden Town partnership has continued to secure appropriate planning permissions and has been actively working with developers to deliver sites including preparing Supplementary Planning Documents (SPD) and development briefs for new development sites. One example of this has been the adoption of an SPD for the East of Harlow site with Epping Forest District Council.
- 4.4. The Local Plan requirement embraces the objectively assessed housing need (7400 dwellings) and increases that with additional dwellings to help increase affordability and support the Council's policy of regeneration. Table 5 shows the land supply situation at 31 March 2024 for the 5-year period. Table 6 shows the total number of developable sites to the end of the Plan period.

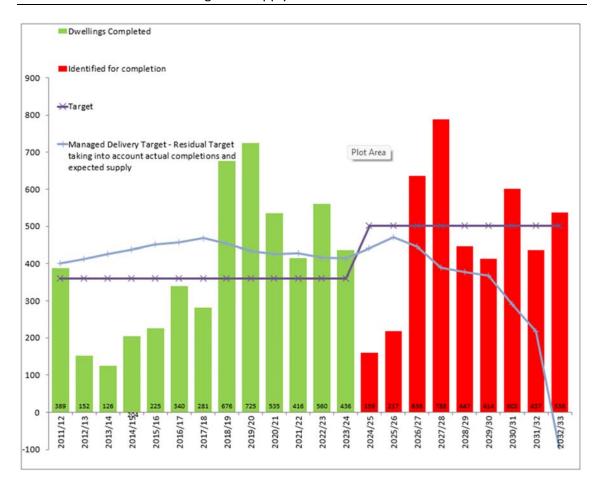
Total Number of Committed Deliverable Dwellings	1872
Total Number of Allocated and other Deliverable Dwellings (see appendix A Other development sites over plan period)	375
Total 5-year Supply	2,247

Table 5 - 5-year Land Supply

Total Number of Committed Developable Dwellings	2436
Total Number of Allocated and other Developable Dwellings (see appendix A Other development sites over plan period)	1,802
Total New Supply to 2033	4,238

Table 6 – Total land supply over the remaining Plan period

- 4.5. At the time of producing the monitor the latest Housing Delivery Test results have not been published. The Council's assessment at this time is that there will likely be no requirement to increase the supply buffer to 20%. Harlow Council is not required to have a buffer in its five-year supply as per the December 2023 NPPF.
- 4.6. The total deliverable supply of 5.27 years meets the NPPF five-year requirement The graph below summarises the current trajectory, and Appendix A details the trajectory on a site-by-site basis.



- 4.7. A detailed breakdown on a site-by-site basis is set out in Appendix A.
- 4.8. The 5-year requirement will be review ed annually through the Authority Monitoring Report.

# **APPENDIX A**

March   Marc		YEAR SUPPLY - 2024 TO 2029 (1/4/24 - 31/3/29)		1		i	YR14	YR15	YR16	YR17	YR18	YR19	YR20	YR21	YR22	YR23	YR24	YR25	YR26	YR27	YR28	YR29
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A		North Of Avimer House, Kitson Way Section 106 signed september 2024 considered deliverable within 5 years	0	56	56	56			56													
Form Full from Name Internal Control C		Northbrooks House COMPLETED	47	47	0	0																
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