

Housing Land Supply Monitor

April 2024 to March 2025



Harlow Local Development Plan

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1. Introduction

- 1.1 The Government published an update to the National Planning Policy Framework (NPPF) for consultation during Summer 2024, and published the new version of the NPPF in December 2024¹.
- 1.2 Paragraph 78 of the December 2024 NPPF concerning maintaining supply and delivery states:

"Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or*
- b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply"*

The Harlow Local Development Plan ²was adopted in December 2020 and at the end of the monitoring year, it was less than five years old. Therefore, this Housing Land Supply Monitor and Five Year-Land Supply are based on the housing numbers in the adopted Local Plan.

- 1.3 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 Report for the year 2024-2025](#)³. However, it does not include the results from the latest Housing Delivery Test (2024) which will be published on the council's website as soon as it is received from the government.
- 1.4 Since the publication of the first Monitor for 2021- 2022 period, there have been several guidance documents and council policies produced that have had a bearing on the trajectory going forward. These documents have identified further land supply that have now been introduced into the trajectory. These documents include adopted Supplementary Planning Documents, and a Cabinet endorsed council house building programme.
- 1.5 The information in this document will be used for decision-making purposes when determining planning applications or appeal inquiries for residential development.

¹ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

² [Harlow Local Development Plan 2020](#)

³ <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 HLDP 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 HLDP 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) was to provide 2,600 dwellings in Harlow during the Local Plan period. A further 834 dwellings across the district will also be provided through further site allocations identified in the HLDP. 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 HLDP 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 for the HLDP, the Inspector agreed that the council could identify sufficient sites for the first five years of the Plan. The Inspector also agreed with

using the Sedgefield⁴ approach for dealing with under-supply. 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 HLDP "fixed" the housing requirement at 9,200 dwellings and the annual dwelling requirement at 361 (and later 501 dwellings), over the lifetime of the plan.
- 2.8. This monitor moves the land supply situation that was fixed in the Local Plan to March 2025.

⁴ The Sedgefield method of calculating land supply involves adding any shortfall of housing in the local plan from previous years over the next five years of the plan period, whereas the Liverpool method spreads the shortfall over the whole remaining plan period.

3. Housing Land Supply 2024 to 2025

- 3.1. This monitor updates the land supply situation to March 2025 with the development progress at that time including new completions and commitments up to the 31st of March. It then recalculates the five-year supply and sets out a detailed trajectory for the remainder of the Plan period to 2033.
- 3.2. In addition to completions and commitments the trajectory has considered other documents and evidence prepared by the council which either supports or has identified new homes across Harlow. These documents include adopted Supplementary Planning Documents, and a Cabinet endorsed council house building programme.
- 3.3. This approach is supported by both the NPPF and NPPG⁵ for deliverable (built in 0-5 years) and developable (built in 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 it will be available and could be viably developed at the point envisaged.
- 3.5. All sites the council consider to be deliverable and developable including commitments and HLDP allocations are set out in Appendix A with a description as to why they have been included or a log of their progress where appropriate.
- 3.6. This monitor sets out the current five-year supply position for Harlow which is informed by the information collected for Appendix A. This sits alongside the 2024/25 AMR. It uses the NPPF Annex 2: Glossary definition of 'deliverable' housing units, using the NPPG examples of evidence to demonstrate deliverability, where necessary.

Housing Delivery Test

- 3.7. The Housing Delivery Test is an annual measurement of housing delivery for plan-making authorities. It is calculated by using a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the area, over a rolling 3-year period. It is calculated and published by the government.
- 3.8. The level of under-supply determines the potential consequence the authority must implement. An action plan may be required setting out how the Local Authority will look to provide additional homes, a buffer of 20% may be required to the five-year land supply or applications will be determined against the Presumption in Favour of Sustainable Development as per the NPPF.
- 3.9. For the 2023 Housing Delivery Test⁶, which is the most recent one supplied by government, the number of homes provided in Harlow (1,504 dwellings) exceeded the test requirement (964 dwellings) and consequently no buffer or action plan is required.
- 3.10. At time of publication of this Monitor the 2024 Housing Delivery Test results for Harlow had not been published but they are expected early in 2026.

⁵ <https://www.gov.uk/guidance/housing-supply-and-delivery#demonstrating-a-housing-land-supply-beyond-5-years-~:text=Paragraph%3A%20011%20Reference%20ID%3A%2068%2D020%2D20190722>

⁶ <https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement>

Baseline Data – Completions to 2025

3.11. The housing requirement of 9,200 remains as the baseline of the supply calculation until the council is required to use the government’s “standard method” to calculate need. This is currently 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. The NPPG 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
2024-2025	118	5,183	-383	-11

Table 3 – Housing completions and cumulative differences

3.13. As table 3 shows there had been a consistent shortfall in the number of cumulative completions against the HLDP requirement up until 2020 when the shortfall was beginning to reduce as strategic sites (from the previous Harlow Local Plan 2006) had begun to build out. However, due to the drop off in completions there is now a cumulative undersupply of 11 dwellings. This will need to be added to the next five-year supply requirement.

3.14. Whilst there was a peak of completions in the 2018-2020 period this has since begun to slow down, as the impacts of rising construction and labour costs are impacting the development sector. There had 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 completion rate at Newhall and Gilden Park.

3.15. During the monitoring year, dwelling completions have reduced significantly to 118, short of the higher target of 501 dwellings, as some larger sites have now built out (such as Gilden Park, Edinburgh Way, Burnt Mill, Wych Elm and Harlow Rugby Club) and existing permissions and the East of Harlow Strategic Site have been slow to build. This may have an impact on the Housing Delivery Test going forward.

Five-year Housing Land Supply 31 March 2025

3.16. The five-year supply calculation using the annual requirement set out in the HLDP at 31 March 2025 is set out in table 4:

a	Requirement to be delivered in plan period	9,200
b	Completions since start of plan	5,183
c	Residual to be delivered over remaining plan period [a-b]	4,017
d	Annual requirement over plan period [a/22]	418
e	Stepped Five-year requirement (501x5)	2,505
f	<i>Under Supply</i> since start of plan 2011-2024	11
g	Five-year requirement plus addition of under supply [e+f]	2,516
h	Annualised figure with under supply [g/5]	503
i	Total 5-year requirement	2,516
j	Proposed allocations & Other sites (25/26 to 29/30)	1,005
k	Commitments	1,571
l	Total Five-Year Supply [j+k]	2,576
m	Percentage Achievable [i/l*100] plus 5% buffer	97.51%
n	Years Supply [i/5=annual] with 5% buffer	4.9 years

Table 4 - Five-year supply calculation: March 2025

3.17. Although the council has estimated more homes will come forward over the next five years than is required (60 homes – row l), the addition of a 5% buffer as per the NPPF results in a 4.9-year supply of deliverable housing.

Land Supply 31 March 2025

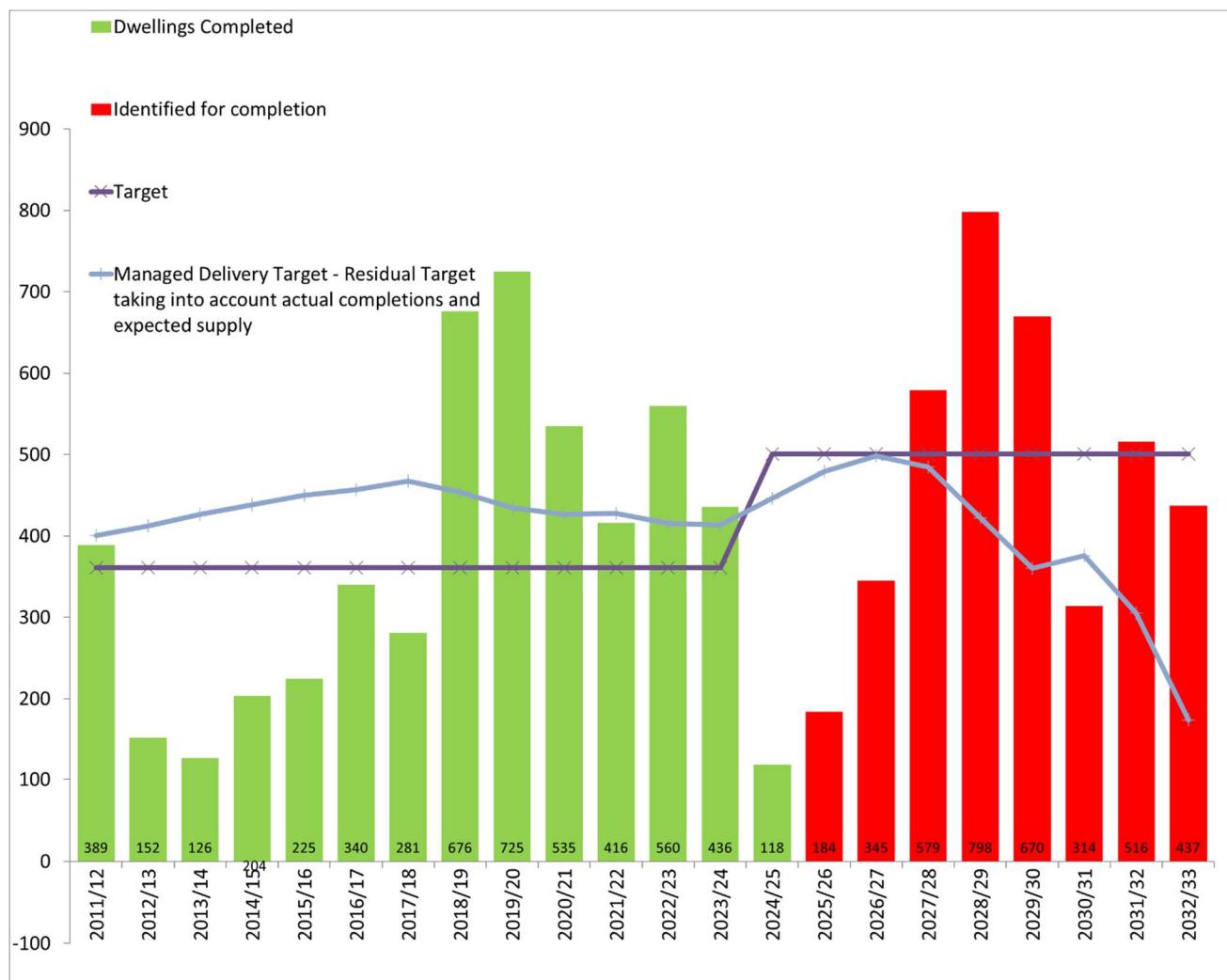
3.18. As set out in the HLDP the overall housing requirement over the plan period 2011 to 2033 is 9,200 dwellings. The Housing Trajectory set out in Appendix A indicates that with housing completions from 2011 to 2025 and housing commitments and other development sites identified to 2033, the housing supply is 9,026 dwellings.

3.19. Consequently, there is an undersupply on the Local Plan's requirement of 174 dwellings or 98%. This shortfall on the requirement, although minimal, is something that will be closely monitored over the remainder of the Plan period through the council's Authority Monitoring Reports.

3.20. As previously stated, the shortfall has predominantly been caused by sites not coming forward at the pace anticipated in the HLDP, in particular the Strategic Housing Site East of Harlow and the relocation of Princess Alexandra Hospital, where expected completions have now moved beyond the plan period.

4. Conclusions

- 4.1. The total supply for housing delivery for the five-year period from 1 April 2025 to 31 March 2030 is 2,576 dwellings. Therefore the total land supply for the remainder of the Plan period is 3,843 dwellings.
- 4.2. The figure of 3,843 dwellings over the Plan Period is 395 dwellings less than that forecast to be delivered over the remainder of the plan period in the previous 2023/24 Supply Monitor. The reason for this is some completions have not come forward at the rate expected and have consequently fallen outside the local plan period. This has therefore affected the supply figure which is now a shortfall of 174 dwellings compared to an oversupply of 103 dwellings last year.
- 4.3. Committed and allocated sites, in particular the Strategic Housing Site East of Harlow and relocation of Princess Alexandra Hospital, have not delivered as quickly as was anticipated in the Local Plan. Furthermore, some larger planning consents (such as Strawberry Star in the town centre) have been slower to implement their planning permissions.
- 4.4. The delay in the HLDP's two largest sites has moved their completions further into the future. The Strategic Housing Site East of Harlow is only providing a minimum contribution to the five-year supply and the existing Princess Alexandra Hospital site now falls outside of the Local Plan period. The stepped trajectory increase to 501 dwellings per annum was to be met by the East of Harlow site and therefore this delay has had a significant impact on housing delivery outside of the council's control.
- 4.5. The council and wider Garden Town partnership strive to secure appropriate planning permissions and are actively working with developers to deliver sites including preparing Supplementary Planning Documents (SPD) and development briefs for new development sites. One example was the adoption of an SPD for the Strategic Housing Site East of Harlow with Epping Forest District Council.
- 4.6. The total deliverable supply of 4.9 years just falls short of the NPPF five-year requirement. However, despite this there is clear support and for providing for Harlow's housing needs. The slight drop below the 5-year requirement 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 because of increases in materials cost, shortage of labour in the market, viability constraints or landownership delivery issues.
- 4.7. The council's commitment to meet the housing needs of the town is clearly demonstrated in the trajectory in appendix A. The total number of dwellings which the council has identified as commitments, allocations and other sites (such as those identified in Supplementary Planning Documents and development briefs) totals 7,750 dwellings from 2025 onwards, along with past completions there will be over 12,700 dwellings built or identified for development. This is significantly higher than that required in the HLDP.
- 4.8. The graph below summarises the current trajectory, and Appendix A details the trajectory on a site-by-site basis and demonstrates the council's commitment to meeting future housing needs.



4.9. A detailed breakdown on a site-by-site basis is set out in Appendix A.

4.10. The 5-year requirement will be reviewed annually through the Authority Monitoring Report.

APPENDIX A