

Sent by email to: [myharlow@harlow.gov.uk](mailto:myharlow@harlow.gov.uk)

23/09/2020

Dear Sir/ Madam

### **Harlow Local Plan EIP – consultation on 2018-based Household Projections**

The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

On the whole we support the approach taken by the Council in its assessment of OAN using the 2018-based household projections which recognises the limitations with regard to principal projections from this latest data which use only 2 years of trend data and the fact that household formation will have been suppressed due to restricted supply. We continue to have concerns regarding the application of such a low market signals uplift across the HMA given the significant affordability concerns across many parts of this area, but we agree with the Council's overall assessment that there has been no meaningful change in the housing situation following the publication of the 2018-based household projections.

As is noted in EX0088, PPG outlines that Councils must not only consider the latest available information and whether there has been a meaningful change in the housing situation but also that any consideration should be made in the context of keeping the plan up to date. It is therefore important to recognise that the context within which this plan is being examined – namely under the transitional arrangements as set out in paragraph 214 of the 2019 NPPF. This transitional period was included in the NPPF to allow LPAs that had submitted plans, or were close to submission, to continue with their existing evidence base. The transitional period reflects the Government's desire for a plan led system and the drive to ensure all LPAs had adopted local plans in place. What the transitional period was not meant to lead to was a continued updating of the evidence of supporting local plans submitted prior to January 2019 – particularly were this would not be consistent with the Government's continued aims to boost housing supply<sup>1</sup> to 300,000 homes per year.

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<sup>1</sup>Paragraph 6 'Changes to the current planning system' (MHCLG, 2020)

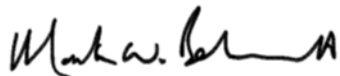
<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>



Indeed the continued reliance on the submitted evidence for transitional plans is supported in the November 2018 letter to Chief Planning Officers which states in its update on the use of the 2016-based household projections in the standard method that plans submitted on or before the 24 January 2019 can be based on existing assessments of housing need at the time of submission. This would suggest that the Government were not endorsing the use of the later household projections within transitional plans in the same way that they have not endorsed their use in the current standard method. It is also important to note that an up to date plan under the 2019 NPPF would require Harlow to deliver 442 dwellings per annum.

As such we would agree with the Council that it is not necessary to modify the housing requirement on the basis of the latest demographic projections. As required by the PPG the Council have considered the latest data and concluded that the 5% change in the OAN across the HMA does not represent a meaningful change in the housing situation. Indeed, maintaining the housing requirement would also take into account the context within which the plan is being prepared, the advice provided by MHCLG in relation to transitional plans, and the Government's continued goal of delivering 300,000 homes per year.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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