

Sent by email to: myHarlow@harlow.gov.uk

07/09/2017

Dear Sir/ Madam

Response by the House Builders Federation to the Harlow Development Management Policies consultation

Thank you for consulting the Home Builders Federation (HBF) on these development management policies. 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.

We have commented in the past on the more strategic elements of the Harlow Local Plan and we hope to see these progressed as soon as possible. It is important that the Council moves forward with its Local Plan to ensure sufficient sites are allocated to meet Harlow's housing needs. The Council has consistently under delivered against its planned targets and having an adopted plan will secure the necessary allocations to meet its housing needs. However, as this consultation is purely on proposed development management policies we will not comment further on the strategic concerns relating to housing needs and supply.

Viability evidence

Our principal concern is that the Council does not appear to have undertaken any assessment as to the viability of the policies it is proposing in this consultation. The most recent evidence on the Council's website is the 2010 study prepared by Levvel for the London Commuter Belt (East)/M11 Sub Region. This study cannot be considered an appropriate evidence base to support the preparation of a local plan and the we would expect the Council to undertaken a full assessment of whole plan viability prior to any further consultation. Without this evidence the Council cannot support any of the policies in the consultation document which will place additional costs on the development industry in the Borough. As such the H5 Accessible and Adaptable Housing, H8 Affordable Housing and H9 Self and Custom Build Housing are not justified and cannot be considered to be sound.

In addition to concerns with regard to the lack of an up to date viability assessment supporting these polices, and in fact the whole plan, we also have concerns regarding the approach taken to each of these polices.

Accessible and adaptable housing

The Council must provide more detailed evidence relating to the need for these optional standards. Planning Practice Guidance (PPG) sets out the evidence required to support the introduction of such policies and this must be considered by the Council if it is to justify this policy. The policy is also vague and does not provide the required certainty that will allow the development industry to consider the implications of this policy on development viability. If the Council can justify the need for this policy then it must set out the proportion of homes to the higher optional standard are required on major sites. At present this policy is not consistent with the NPPF which sets out in paragraph 17 the need for plans to provide a practical framework within which decision can be made with a high degree of predictability.

Affordable housing

Similarly the policy on affordable housing must also send out clear signals to the market about the Council's intentions. By stating that the Council will require "at least 30%" of major residential development to be affordable homes suggests that in some circumstances a higher proportion may be required. This does not meet the principles set out in paragraph 17 as highlighted above and makes it difficult for the development industry to be sure as to the actual costs of bringing a site forward in Harlow. We would also suggest that the Council ensures that this policy reflects national guidance on planning contributions for affordable housing to ensure clarity and support predictable decision making.

Self and Custom-build housing

This policy sets out that all allocated sites must include an element of serviced plots for self-build housing. Such an approach is ineffective and unjustified. Firstly, the Council does not appear to have considered that some allocated sites may well be a purely flatted development. On such sites it would not be possible to deliver any self-build units and the Council should ensure such sites are not required to include an element of self-build plots. Secondly, the policy provides no indication as to the amount of self-build plots that will be required from allocated sites. This makes it impossible to assess the impact on viability of this policy. We would suggest that the Council first considers the evidence of the need for self-build plots using its statutory register. This would then give an indication as to the number of self-build plots required. From this starting point an appropriate evidence based strategy for supporting self and custom-build housing could be developed.

We also consider the two year time frame for commencement before the plots revert to conventional development to be too long. If there is a demand for such units as evidenced by the Council's self-build register there should be very little delay in the plots being acquired a development commenced. We would suggest that the time frame is reduced to 12 months.

We trust that these issues will be considered carefully by the Council and look forward to further consultation on the next iteration of the Local Plan. I would also like to be

placed on your consultee database and receive updates on any further consultations with regard to the emerging Local Plan.

Yours faithfully

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