

Harborough Local Plan (“HLP”) (March 2025) – Examination¹
Inspectors’ Panel Note 8: Stage 2 Matters, Issues and Questions
MATTER 3: Hearing Statement on behalf of Richborough
15 October 2026

¹ Each Question relevant to matters Planning Prospects raised in submissions to the Regulation 19 consultation on behalf of Richborough is set out in bold with Planning Prospects’ summary response to each question then set out which we will expand upon when taking part in the scheduled hearing session. We have focussed here on the specific matters raised in Panel Note 8’s questions, without prejudice to the wider points around the soundness of the draft HLP’s housing policies and provisions as we have set out in more detail in our submitted Regulation 19 Housing Assessment and representations as a whole, which should also be referred to.

Matter 3: Amount and Distribution of Development

Whether the amount and distribution of development is positively prepared, justified, effective and consistent with national policy?

Policies DS01, DS02, DS03, DS04, DS05, SA01 and AP01 to AP05

Issue 1: Spatial Strategy

- 1. Does the Plan clearly articulate its spatial strategy?**
- 2. Is the spatial strategy as set out in Strategic Policies DS01 to DS05, and elsewhere in the Plan, an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?**
- 3. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?**

No. It is not appropriate that the strategy suppresses and does not meet fully the need for development. As set out elsewhere (in relation to Matter 5) the approach to defining Areas of Separation is not robust and the realistic option of defining these restricted areas more tightly, so opening a wider area available for development and allowing a broadening of the distribution of development, has not been properly considered.

Issue 2: Delivering Homes

- 1. The Settlement Hierarchy Assessment January 2025 [PPL-NLP1] scores settlements and groups them according to a number of sustainability factors, which provides the settlement hierarchy in the District. That underpins the hierarchy set out in Policy DS01 and AP01. Is the methodology in determining the Plan's settlement hierarchy robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?**
- 2. Is the proposed distribution of housing supported by the evidence in the Strategic Housing and Economic Land Availability Assessment (SHEELAA), [HSG-NLP4 to 6] settlement hierarchy, and SA, and will it lead to an appropriate pattern of housing growth?**

Richborough support the identification of Lutterworth as a Market Town at the top of Harborough's settlement hierarchy.

However, our previous submissions highlighted that despite Lutterworth being one of two Market Towns and a 'focus for growth', it has very limited growth apportioned to it within the HLP period. Table 2 of the draft HLP is updated through MM7.2 reflecting latest data² but still shows just 320 new homes allocated to Lutterworth within the HLP. This represents just under 5% of the New Local Plan Growth (Policy DS01) and just 24% of growth directed towards Market Harborough, the other Market Town in the hierarchy. Indeed it is *less* than each of the "large villages" on the tier *below* Lutterworth in the hierarchy.

² At 1st April 2025

The HLP says this reflects the higher number of homes already permitted in Lutterworth (nearly all in Lutterworth East SDA allocated in the previous Plan). Our previous submissions highlight the lack of progress at Lutterworth East and the over reliance there. It is therefore entirely appropriate for alternatives to be considered.

The HLP references Lutterworth's smaller population compared with Market Harborough, to justify its lower provision. However, it says Lutterworth's population was less than half Market Harborough's, but Market Harborough has more commitments³, has had 4x more completions since 2020 and has over 4x as many homes allocated in the HLP (Policy DS01). Lutterworth has seen fewer completions than Scraftoft/Thurnby/Bushby and Fleckney since 2020.

The lack of growth for Lutterworth is unjustified, ineffective and indicates the plan has not been positively prepared or drafted with any recognition of, or attempts to address, the failure of Lutterworth's historic SDA allocation.

The distribution of development between tiers is not justified and will lead to an inappropriate pattern of growth within Harborough, and Lutterworth in particular.

3. –

4. **How has the Plan's aim to accommodate some of Leicester's unmet housing need been reflected in the Plan's spatial strategy? Does it strike the right balance between promoting development between the Leicester urban area and the District's market towns?**

No.

HLP Policy DS01 sets a requirement of 13,182 between 2020 and 2041. It sets a requirement of 657 dpa for 2020 to 2036, decreasing to 534 dpa between 2036 and 2041. This comprises Harborough's LHN (534 dpa) and a proportionate share of unmet need from neighbouring Leicester (as informed by the L&L SOCG⁴). As such, the HLP requirement includes 123 dpa for 2020 to 2036 (i.e. not the whole Plan period) to meet Leicester's (unmet) housing need, not Harborough's own LHN.

Without its contribution to Leicester's unmet need the HLP fails to satisfy the NPPF transitional arrangements it has been submitted against.⁵ It is Richborough's contention that the gateway test at paragraph 234(a) NPPF has not been passed.⁶

³ 2,008 at 01.04.23 vs Lutterworth's 1,704

⁴ Leicester and Leicestershire Statement of Common Ground, which forms a key part of the adopted Leicester Local Plan's evidence base – and other recently adopted plans in the Housing Market Area (HMA).

⁵ Subject to Stage 1 Hearings and further detail provided below in response to Issue 4 Q1

⁶ Following the Stage 1 Hearing Richborough remain unconvinced that the approach taken by the Inspectors is consistent with what the NPPF says, and does not make sense in planning terms. The interpretation of policy wording alongside comparing the aggregated requirement with a solus LHN does not grapple properly with what policy says, and this makes the approach vulnerable to challenge.

The HLP states that its focus on locations adjoining Leicester Urban Area also arises because of higher levels of accessibility to public transport. MM7.4 adds that the strategy also aligns with the non-statutory Leicester and Leicestershire Strategic Growth Plan (LLSGP).

HLP Paragraph 4.9 says that its strategy identifies a development pattern seeking to support Harborough's economy, provide balance between homes and jobs, and ensure access to services and facilities.

However, the lack of homes allocated in Lutterworth over the HLP period does not support Lutterworth's economy, services or facilities. The LLSGP encourages managed growth at Harborough's Market Towns including Lutterworth (MM5.1) and being a Market Town at the top of Harborough's settlement hierarchy Lutterworth should be a focus for growth within the HLP.

Instead, the strategy directs higher growth towards less sustainable settlements and relies too heavily on large allocations adjoining the Leicester Urban Area and at Market Harborough, and from locations in Lutterworth with a history of non-delivery during the 2019 Plan period to date.

The HLP is not striking the right balance in Harborough or its Market Towns.

Issue 3: Housing Need and Requirement

- 1. The Plan area's housing need is calculated using the standard method set out in PPG [ID: 2a-002-20241212] [ID:2a-004-20201216]. That results in a Local Housing Need (LHN) figure for the District of 534 homes per year. The Council in its response to the Panel's PQ16 confirms that its latest calculation of LHN in is 2022 [HDC2]. The Plan's housing requirement includes an element of LHN plus an allowance for unmet needs in the Leicester City. The Plan's housing requirement is the same as the housing to be delivered by this Plan.**

In deriving the Plan's housing requirement from the calculation of LHN, should supply prior to the latest calculation of LHN be taken into account? Given that the PPG explains that the purpose of the affordability adjustment applied in the Standard Method takes account of past delivery would this be a justified approach consistent with national policy? [ID:2a-011-20241212] [2a-011-20190220].

- 2. The Panel notes the Council's response to the Panel's PQ16 [HDC2]. If the Panel were to decide that the Plan's housing supply prior to the latest calculation of LHN should be discounted from its housing requirement, what is the implication for the Plan housing requirement?**

Notwithstanding our concerns over the HLP's approach to supplement Harborough's own LHN (calculated using a previous Standard Method (SM)) with a proportion of Leicester's unmet needs to create a requirement just over 80% of its known LHN now (calculated using the latest SM) to make use of the 2024 NPPF's transitional arrangement, the PPG states:

“The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.

Where an alternative approach to the standard method is used, past under delivery should be taken into account.”

The Harborough part of the HLP requirement is calculated using a SM (and not an alternative method) so past delivery should not be taken into account in identifying the HLP requirement and should not be used to suppress future supply.

- 3. NPPF paragraph 63 sets out, in the context of establishing need, the size, type and tenure of housing needed for different groups in the community that should be assessed and reflected in planning policies. The non-exclusive list of those with specific housing needs includes those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. How has the Plan assessed and sought to meet the needs of those with specific housing needs as required by NPPF paragraph 63?**

Our previous submissions highlighted that the HLP identifies a need of 421 Affordable Homes annually⁷. It says that most of the District’s affordable need can be met if major developments deliver 40% affordable. Whilst the Plan anticipates some developments by registered providers will deliver higher percentages, the Plan relies on most major developments delivering 40%.

However, the annual need of 421 affordable homes is 79% of Harborough’s LHN (534 dpa). We have highlighted the over-reliance on strategic allocations to deliver the housing required, particularly the Lutterworth East SDA which has significantly reduced its affordable provision due to viability concerns. If this strategic development cannot deliver the affordable homes needed of it then the affordable homes needed in the District, and Lutterworth in particular, will not be delivered.

4. –

Issue 4: Leicester City’s Unmet Need

- 1. The Plan’s housing requirement includes an allowance for Leicester City’s unmet need until 2036. This is made up of a requirement above LHN of 123 homes per annum 2020-2036 based on evidence in the Housing Distribution Paper (June 2022) [HSG-NLP3]. What is the robust justification for this approach?**
- 2. Should the Plan’s housing requirement include provision for unmet need beyond 2036? Has Leicester’s unmet need beyond 2026 been quantified through the local**

⁷ paragraph 6.7

plan process? In the absence of robust evidence justifying Leicester City's capacity, is there robust evidence to support such an approach?

MM7.1 suggests Harborough now has a pipeline of 8,902 homes built since 2020, already committed with planning permission / allocated in Neighbourhood Plans or which the Council expects as windfall sites by 2041. MM7.1 then suggests that this brings the total supply to 15,324 between 2020 and 2041, 2,412 more than the 13,182 home HLP requirement. This, it suggests, provides additional contingency to allow for possible future circumstances affecting supply, including potential future unmet need from other HMA authorities.

Our earlier submissions raised concerns over the HLP previously suggesting it made provision for a total of 14,839 dwellings to meet the requirement of 13,182 dwellings, representing a contingency of 1,657 homes (or 12.5%).

The HLP requirement (13,182) is substantially below Harborough's latest LHN calculated using the Government's updated SM, so any 'contingency' should be recognised in context of the HLP under delivering the homes needed locally. We also highlighted that the 'contingency' was roughly equal to the contribution anticipated from any one of the planned SDAs such that if any of these does not deliver as anticipated, the contingency will disappear.

Whilst MM7.1 indicates a larger contingency, it is only 755 homes larger – not enough to remove our concerns. It is still only 16%, which is below the 20% that we (and others such as the HBF) typically support in normal circumstances where a contingency is added to ensure that an LPA's own needs can be met.

The lower (16%) contingency in the draft HLP is considered particularly deficient given its over-reliance on sites unlikely to deliver the housing relied upon in the draft Plan's Trajectory.

Here, the HLP also includes a housing requirement made up of a significantly deficient LHN for Harborough plus a contribution to meeting Leicester's unmet needs. Its contingency is already being relied on to meet unmet needs arising from its neighbours.

The Harborough LHN (forming part of the HLP requirement) was just 74%⁸ of Harborough's LHN known at the time of preparing the Regulation 19 draft (723dpa). It is now even less⁹ as Harborough's LHN calculated using the latest SM has gone up (755dpa). Indeed, all HMA authorities have seen an increase in LHN calculated using the latest SM¹⁰. Therefore, the likelihood of Harborough having to meet other neighbours' unmet needs is increased, and the amount of unmet need is likely to be higher also.

The suggested contingency is insufficient and also relied upon for multiple purposes. If it is needed for just one of those purposes it could quickly be eliminated.

⁸ 73.8%

⁹ 70.7%

¹⁰ Using latest data

Issue 5: Housing Supply

1. PPG confirms that a Plan's housing requirement may be set as a stepped requirement in plan-making where this is appropriate to reflect circumstances within the area. In doing so, planning authorities will need to set out the stepped requirement in the strategic housing policy and provide evidence to support their approach. [ID: 68-012-20190722¹¹].

It also confirms that a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the Plan period. [ID: 68-021-20190722].

The Plan includes a stepped housing requirement. What is the robust justification specific to this Plan's circumstances to justify the approach taken?

The stepped requirement is presented to meet Leicester's unmet needs until 2036 and not to reflect a significant change in the level of housing requirement between Harborough's own emerging and previous policies.¹²

Regarding strategic sites, the HLP trajectory does not show the level of delivery anticipated from all its SDAs (such as Lutterworth East¹³) but many of the larger and strategic allocations shown in the trajectory do assume delivery in earlier years of the Plan period, including when the requirement reflects Harborough's contribution to Leicester's needs. The Council's response to Panel Note 2 includes (at Appendix 2) its Deliverable Sites list which indicates delivery from Lutterworth East from 2031/32, during the period when the HLP requirement includes a contribution towards Leicester's unmet need. As such, Harborough is not suggesting the requirement should be stepped to reflect phasing of its strategic and larger sites (which are already significantly overdue).

The only justification provided for its stepped trajectory is to meet Leicester's unmet needs until 2036, but the HLP requirement will not meet Harborough's own needs during either of its stepped requirement phases.

2. **Will the Plan provide a supply of deliverable and / or developable sites and / or broad locations to meet the full housing requirement for the whole of the Plan period?**
3. **It is intended that the Plan's housing requirement will be met through new local plan allocations, a small villages requirement, a windfall allowance, commitments (extant planning permissions and neighbourhood plan allocations), and completions**

¹¹ Note: this reference to PPG is in reference to 5YHLS Annual Position Statement. We believe the correct reference to be **ID: 68-021-20190722**

¹² Notwithstanding there is a significant change in Harborough's housing need in application of the latest LHN using the latest SM but this is not being planned for.

¹³ As the Trajectory has a single number shown for all of the 'commitments' and has a footnote that confirms '*commitment figure includes 1,500 homes on Lutterworth East (see the Local Plan Housing Supply Tables)'

- since the beginning of the new Plan period (1 April 2020). Should the supply prior to the latest calculation of LHN be taken into account?
4. **Would the Plan promote the development of a good mix of sites, including small and medium sites in accordance with the NPPF paragraph 70? Would the Plan provide land to accommodate at least 10% of the housing requirement on sites no larger than 1ha?**
 5. **NPPF paragraph 72 expects that where an allowance is made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliance source of supply, taking account of strategic land availability, historic windfall delivery rates and expected future trends. The Plan's expected housing supply includes a windfall allowance of 450 homes from 2031 to 2041. Would this accord with national policy?**

Site allocations enable the delivery of the Development Strategy. This is outlined in Policies DS01 to DS05. The HLP recognises their importance for delivering the Plan's overall strategy (paragraph 5.4). It is fundamental that the site allocations, and particularly the SDAs, are deliverable and in the correct, and most sustainable, locations.

The HLP's over-reliance on the Lutterworth East SDA to deliver homes needed over the planned period also highlights the continued over-reliance on existing commitments (including 2019 Local Plan allocations) and completions, as well as a significant windfall allowance.

The emerging Plan seeks to allocate just 6,422 homes from new sites. Over half of the proposed housing requirement will be delivered through existing commitments and completions, and a significant windfall allowance.

Reliance on previous commitments identified, but failing to deliver, against previous housing requirements, is compounded where the HLP is not planning for Harborough's now known needs.

If Harborough wishes to rely on existing permissions and allocations as part of its housing supply to meet its emerging requirement, it should provide robust evidence to demonstrate existing sites remain deliverable and developable over the emerging Plan period.

Including windfall sites within the planned requirement removes opportunity for windfalls to provide additional contingency to the planned supply. Windfalls often do not provide the market choice and flexibility that allocations do and any supply provided by windfalls should be in addition to the lower than necessary 'contingency' identified in the Plan and also in addition to the necessary buffer added to the housing need figures when undertaking the 5YHLS calculation¹⁴.

6. –

¹⁴ This in the context that the draft HLP fails to plan for enough homes to deliver Harborough's identified housing needs anyway, and by a significant margin, and where it continues to follow the same over-reliance on stalled sites and locations set out in the 2019 HLP that have so far failed to deliver the homes needed from them in Harborough since 2011.

7. –
8. –
9. **Would the Plan deliver an appropriate balance between size of site, given the longer lead in times associated with larger sites? Would the Plan’s reliance on large strategic sites, including East of Lutterworth Strategic Development Area (SDA), put delivery at undue risk? And if so, how would this be mitigated?**

Our previous submissions raise concerns with the continued over-reliance on large and strategic sites, particularly in locations that have failed to deliver any homes despite being allocated for housing in the previous Local Plan.

The HLP trajectory includes numerous sizeable allocations which have no planning applications referenced, but where the trajectory assumes delivery will begin well ahead of typical average times¹⁵. If some of these sites do not come forward in the timeframes the trajectory anticipates, and instead come forward more in keeping with the timeframes identified in research (or even do not come forward at all, as has been the case for the 2019 SDAs to date), this would mean hundreds (possibly thousands) of homes anticipated in the HLP period will not come forward in that period at all, further eroding the HLP’s suggested ‘contingency’, and casting further doubt on the Plan’s ability to deliver even its suppressed housing requirement.

Additional housing should be identified, particularly in Lutterworth, to ensure that Lutterworth can make a suitable contribution to Harborough’s housing needs, in a sustainable location at the top of the HLP’s settlement hierarchy.

Issue 6: Five-Year Housing Supply

1. **NPPF paragraph 69 requires that the Plan identifies a supply of specific, deliverable sites or five years following the intended date of adoption. The Council provides an assessment of its five year housing land supply from adoption in appendix 2 to its response to the Panels PQ [HDC2]. That assessment includes an allowance for small villages (117 homes). In so doing would this accord with national policy? Would this be a justified approach?**
2. **The Council includes 222 homes for minor sites (fewer than 10 dwellings) contributing to the 5-year supply from 1st April 2028. What is the robust evidence to justify this approach?**

Only specific deliverable sites can be included in the 5YHLS period and form part of the specific deliverable supply of sites to provide a minimum five years’ worth of housing as required by NPPF paragraph 69. General ‘allowances’ such as the small village allowance (and in our view windfall allowance) are not specific deliverable sites and should not be included in a deliverable (or 5 year) supply¹⁶.

¹⁵ Identified in the Third Edition of the ‘Start to Finish’ report (Lichfields, March 2024) referred to in our previous submission.

¹⁶ Appendix 2 of the Council’s response to Panel Note 2 states “these sources are not site specific but have been included below” i.e. in its Deliverable Sites table

Paragraph 69 also references Footnote 35 which refers to the NPPF's Glossary for relevant definitions¹⁷.

The NPPF definition of 'deliverable'¹⁸ is important as it sets out the type of sites which can be included in a 5YHLS. Its "Category a)" sites¹⁹ should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years²⁰. Its "Category b)" sites²¹ should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. In other words, Category b) sites are not deliverable unless clear evidence is provided to demonstrate that they are.

Any sites from sources not specifically included in the NPPF definition at the relevant base date, including sites with a resolution to grant subject to Section 106 for example, should only be included if supported by clear evidence demonstrating homes will be delivered on the site within five years – aligning them with the Category b) site types.

In general terms, Category b) sites are not available for development now and do not offer a suitable location for development now, and there is not a realistic prospect that housing will be delivered on these sites within five years.

Their availability and suitability cannot be assumed at the base date of the 5YHLS calculation, and they must be accompanied by clear evidence to support that they are deliverable at the base date. Otherwise, they cannot be considered deliverable.

The expectation is that such evidence must be clear. It must be tangible. It must be made available. The onus is on the LPA to provide it.

The Local Plan Trajectory provided within the Council's Proposed Modifications has greyed out the five-year period 2027/28 to 2031/32 and says that the Council can demonstrate a supply amounting to 3,658 homes over that five-year period (which it says represents "5 Year Totals (following adoption during 26/27)").

The Council's response to Panel Note 2 includes (at Appendix 2) its Deliverable Sites list for the five-year period 1st April 2028 to 31st March 2033. This indicates delivery from a number of sites within that five-year period, which is the five-year period after the five-year period indicated as following adoption of the HLP in its Trajectory. Appendix 2 also sets out that it uses data as of 31 March 2025, which would be 3 years old (and out of date) in April 2028. The Council's Panel Note 2 Response Appendix 3 ("LP allocations (housing land supply templates)") and Appendix 4 ("non allocation major sites (Housing Land Supply Templates)")

¹⁷ And requires application of an appropriate buffer (in reference to NPPF paragraph 77)

¹⁸ PPG provides supporting guidance as to what constitutes a 'deliverable' housing site in the context of plan-making and decision-taking [ID: 68-007-20190722] (reproduced here at Appendix 1 for ease of reference).

¹⁹ Comprising non-major development with planning permission and all sites with detailed planning permission

²⁰ For example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans

²¹ Major site with outline planning permission, allocated in a development plan, have grant of permission in principle (PIP), or identified on a brownfield land register – for example

provides what we assume to be the Council's justification, or evidence, for including sites within its deliverable housing land supply for that five-year period.

For the majority of sites, the evidence within these templates does not amount to the clear evidence required and does not support the inclusion of the majority of Category b) sites within the deliverable supply suggested by the Council. There also appears to be some double counting²².

The Council's assumed deliverable supply of 3,658 (for the period 2027/28 to 2031/32) and / or 3,833 (for the period 2028/29 to 2032/33) both represent supply amounts that are only marginally above²³ the DS01 five-year requirement of 690dpa²⁴ for the relevant period. If even modest deductions are made to the Council's anticipated supply(ies) this could quickly bring the figure below the five-year minimum. Given the inadequacy of evidence provided to support the majority of Category b) sites relied upon being deliverable (for example) a number of these sites should be removed from the 5YHLS – and the Council will be unable to demonstrate the minimum required 5YHLS at the point of the HLP's adoption.

Further, and in recognition that even with the contribution to Leicester's unmet need inflating the HLP requirement to 2036, the HLP requirement is only marginally above 80% of the latest LHN using SM, if it falls below 80% the August 2026 NPPF²⁵ requirement for a 20% buffer to be applied would result in a five-year requirement of 3,942. This figure is more than each of the Council's indicated 5YHLS figures at face value. Where Harborough's LHN using the latest SM continues to increase year on year there is a very real risk of a 20% buffer being applicable on adoption.

If Harborough is unable to demonstrate a deliverable (or 5YHLS) supply upon adoption of the HLP its policies for the supply of housing will be inconsistent with, and superseded by, the latest NPPF decision-making policies.

²² For example, Land at Gaulby Road appears to be contributing 48 self-build homes as a draft allocation (B1) in row 36 of Appendix 2 and 48 as a major site with outline planning permission in row 2 of Appendix 2 – albeit with no clear evidence provided to justify inclusion of this site against either of these supply sources in any event – and noting that these are self-build homes

²³ 5.3 years, 208 homes over; and 5.6 years, 383 homes over respectively

²⁴ 657 dpa plus 5% buffer

²⁵ Annex D paragraph 9 part c)

APPENDIX 1: PPG guidance

*“What constitutes a ‘deliverable’ housing site in the context of plan-making and decision-taking”
[ID: 68-007-20190722]:*

“As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;*
- are allocated in a development plan;*
- have a grant of permission in principle; or*
- are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- firm progress with site assessment work; or*
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

Plan-makers can use the [Housing and Economic Land Availability Assessment](#) in demonstrating the deliverability of sites.”