



**Harborough Local Plan Examination in Public  
Stage 2 Hearing Statement  
Matter 3 Amount and Distribution of  
Development**

Submitted on behalf of Mulberry Strategic  
Land Ltd.

October 2026

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Jessica Herritty



**Client**

Mulberry Strategic Land Ltd.

**Our reference**

MULS3001

October 2026

# 1. Introduction

- 1.1 This hearing statement has been submitted on behalf of Mulberry Strategic Land Ltd. ('our client') in response to the Inspector's matters, issues and questions to the Harborough Local Plan Stage 2 Examination and in relation to their land interests at land off Uppingham Road, Bushby ('the site').
- 1.2 Mulberry Strategic Land Ltd. is promoting land off Uppingham Road, Bushby ('the Bushby site'). Since the submission of the Regulation 19 representations, an outline planning application was submitted to Harborough District Council (HDC) on 13 November 2025, for *"up to 900 dwellings, a primary school, local centre (including sui generis, C3, E, and F2 uses and a flexible community use building), open space, ancillary infrastructure and associated works (all matters reserved except for access)"* (application Ref: 25/01587/OUT).
- 1.3 The application was submitted for outline planning permission with all matters reserved except for access.
- 1.4 Mulberry Strategic Land Ltd. submitted an appeal in July 2026 on the basis that HDC failed to give notice of its decision within the appropriate period. The appeal is currently ongoing. A six-day inquiry has been agreed with the Planning Inspectorate and HDC, which will commence on the 3<sup>rd</sup> March 2027 (appeal reference: 6013079).
- 1.5 The site has not been included as a proposed housing allocation in the emerging Local Plan. This notwithstanding, the site was assessed in the Council's Strategic Housing and Economic Land Availability Assessment Update 2024 (SHELAA), identified as site 'Land South of A47 Uppingham Road. Ref: 21/8150'.
- 1.6 It is clear that the Council considered the site was acceptable for circa 1100 dwellings. The assessment confirmed that the site is available, suitable, achievable and ultimately developable. The justification for excluding this site from the 2024 SHELAA was that it was a duplicate of a site assessed in 2021 (site reference 10251). Please refer to the submitted Regulation 19 representations for further detail on the site and the assessment of the site by HDC.
- 1.7 We maintain that the site represents a sustainable location for development and would form a logical extension of Bushby. Furthermore, Bushby is located within the Leicester Urban Area, which is identified in the spatial strategy as the key location to accommodate growth in the adopted and emerging Local Plans. As such, the development of this site would align with the overarching spatial strategy for the emerging plan.
- 1.8 The following section sets out our response to the Inspectors issues and questions in relation to **Matter 3 Amount and Distribution of Development**.
- 1.9 All references made to the National Planning Policy Framework (NPPF) are to the 2023 version (unless otherwise specified).

## **The Promoter**

### ***Mulberry Strategic Land Ltd.***

- 1.10 Mulberry Strategic Land Ltd. ('Mulberry') is a privately owned, multi-disciplinary developer within both the commercial and residential sectors. Mulberry work closely with planning authorities to deliver proposals that directly address relevant economic, social and environmental objectives, embracing local and national policies. Mulberry has significant experience and expertise in promoting strategic land, for both residential, commercial and mixed-use schemes. Part of Mulberry Property Developments, they have a growing portfolio of land developments, ranging in size, across the UK.
- 1.11 They work closely with key stakeholders from landowners and local communities through to local planning authorities and politicians, to deliver developments which add value to everyone.
- 1.12 Mulberry uniquely are not only a promoter but also have a house building branch to the business, developing circa 350-400 homes per annum across the Midlands and Essex regions. Mulberry have extensive experience in the Harborough District area, having completed successful and exemplary developments at Great Bowden and Lutterworth more recently. Specifically considering land at Bushby, Mulberry are seeking to work with partners to deliver the residential development, meaning that at any time there would be two developers on site to enable accelerated delivery.
- 1.13 Mulberry has been promoting the land off Uppingham Road, Bushby, for residential development throughout the preparation of the emerging Local Plan.

## 2. Responses to MIQ's: Matter 3 Amount and Distribution of Development

### Issue 1: Spatial Strategy

#### **Question 1: Does the Plan clearly articulate its spatial strategy?**

- 2.1 Given the importance of this matter, the spatial strategy should be explicitly referenced in the policy.

Word count: 17

#### **Question 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?**

- 2.2 This question is addressed by our response to Issue 2, Q.4.
- 2.3 The plan identifies just four strategic site allocations providing over 500 dwellings, a strategy which is considered to leave little flexibility for proactively meeting housing needs over the plan period, and risks maintaining a five-year housing land supply over the plan period, further compounded by the higher than currently planned for LHN<sup>1</sup>.
- 2.4 Bushby forms part of the Leicester Urban Area (LUA), (a Tier 1 settlement). The allocation of 125 new homes over the plan period in Bushby is at odds with the overall development strategy. The distribution of growth does not align with the Council's own settlement hierarchy or spatial strategy. We propose that more homes are allocated in the LUA (and specifically to Bushby), reflecting its sustainable location, in proximity to Leicester, and better reflecting the overall development strategy.

Word count: 175

#### **Question 3: Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?**

- 2.5 This question is addressed by our response to Issue 2, Q.4.
- 2.6 Given the suitability of the land south of Uppingham Road, Bushby (site ref: 21/8150), as assessed by the Council's 2024 SHELAA, we do not consider that the Council has robustly tested all options which would be available to increase the proportion of growth in the LUA, and therefore align with the spatial strategy.

Word count: 66

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<sup>1</sup> HDC base the housing requirement on an LHN of 534dpa. The current LHN, as calculated in March 2026, is 755dpa, significantly higher than the figure the plan uses.

## **Issue 2: Delivering Homes - Policy DS01 Development Strategy: Delivering Homes**

**Question 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?**

- 2.7 This question is addressed by our response to Issue 2, Q.4.
- 2.8 Given the availability of services in the settlements forming the LUA, and their proximity to Leicester City, we consider this to be the most appropriate location to focus growth in the District over the plan period.
- 2.9 The distribution of growth set out in DS01, does not accord with the spatial strategy to direct the most growth to the LUA, and therefore to the most sustainable locations.

Word count: 80

**Question 2: Is the proposed distribution of housing supported by the evidence in the Strategic Housing and Economic Land Availability Assessment (SHELAA), [HSG-NLP4 to 6] settlement hierarchy, and SA, and will it lead to an appropriate pattern of housing growth?**

- 2.10 This question is addressed by our response to Issue 2, Q.4.
- 2.11 As set out in our Regulation 19 representations, the Bushby site generally scores at a similar level to the sites chosen to be allocated for development in the emerging Plan and against several objectives, scores more highly. In the SHELAA, the site was also considered to be available, suitable and achievable. Given the location in the LUA, the site would also align with the spatial strategy for the emerging Plan.
- 2.12 We maintain that there is continued strong evidence that housing in this location would be sustainable and align with the objectives of the emerging plan.

Word count: 109

**Question 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?**

- 2.13 We agree with the Plan's identification of settlements adjoining the LUA as the highest tier in the settlement hierarchy. The justification presented in paragraphs 4.7 and 4.13 strongly supports that conclusion. The implications of that strategy have not been carried through consistently within the Plan's spatial distribution of development.
- 2.14 The rationale for accommodating Leicester's unmet housing need is not merely a numerical exercise. Leicester is the principal economic, employment, cultural and service centre for the wider area. The Plan itself recognises that the authorities form

part of a shared HMA and that Leicester provides many of the jobs, services and opportunities relied upon by residents across the county. In those circumstances, unmet need should, so far as possible, be accommodated in locations which maintain and strengthen those relationships.

- 2.15 This is particularly important in respect of affordable housing. Locating homes close to the city where need arises helps ensure that households, including those with limited transport choices, can access employment, education, healthcare and other services. By contrast, dispersing development to less accessible settlements risks increasing travel demand, weakening social and economic connections, and undermining the sustainability benefits which the Plan identifies as the justification for its spatial strategy.
- 2.16 Policy DS01 explains that 2,450 homes are to be delivered on site allocations in the LUA<sup>2</sup>. In contrast, 1,670 are to be delivered on site allocations in the Market Towns, 1,500 on allocations in the large villages, 425 in medium villages and at 350 in small villages.
- 2.17 Paragraphs 4.7 and 4.13 of the Plan explain:
- “4.7. ... Leicester provides many of the commercial, job opportunities, cultural opportunities and services we rely on, making interdependent growth crucial for the quality of life across Leicestershire.”*
- “4.13 Our decision to focus residential development predominantly on Leicester Urban Area and Market Harborough is largely a reflection of the higher levels of accessibility to public transport (see Harborough Local Plan Sustainability Appraisal, 2024). Market Harborough has the district’s only railway station, and the bus network is more extensive with higher frequency services near Leicester (Infrastructure Delivery Plan, 2024). ...”*
- 2.18 We agree that the Local Plan should categorise the LUA in this way, and that it is right to identify it as tier 1. However, in our submission, there are broader socio-economic conditions which are not addressed in paragraph 4.13. Unmet need is, of course associated with the needs of the City, itself the key regional and economic hub. Addressing unmet needs elsewhere, or in an ad-hoc manner risks undermining that approach. Similarly, those unmet housing needs include the need for affordable housing. Distributing homes to meet those needs risks undermining social cohesion (by separating communities) and making it more difficult for the occupiers of housing, especially those in need of affordable housing, to access job opportunities in the City.
- 2.19 We note the situation regarding the unmet needs arising from Oxford City Council is comparable. This has been considered in a number of Local Plan Examinations in neighbouring authorities. Appendices 1 and 2 include extracts from the Cherwell Local Plan Partial Review Inspector’s ‘Post Hearings Advice Note’ and the South Oxfordshire

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<sup>2</sup> 1,200 homes to be delivered during the plan period in the Land South of Gartree Road Strategic Development Area, 1,125 homes in Scraptoft and 125 homes in Thurnby and Bushby.

Local Plan Inspector's Report. The same principles apply to Leicester and its neighbouring authorities.

2.20 The Local Plan does not maximise, and focus development in tier 1 of the settlement hierarchy as it claims. In essence, the Plan actively supports, despite that clear strategy, development in manifestly less sustainable locations. This is highlighted by the strategy in DS01, whereby the Local Plan supports windfall sites, and a requirement for unidentified sites at small villages, in lieu of further support in the LUA.

2.21 We recognise that the amount of development directed to the LUA is greater than the total quantum of unmet need to be addressed by this Plan (123 homes per year between 2020 and 2036). However:

- There is nothing in the Plan to identify that the dwellings directed to tier 1 only address unmet need, nor that unmet need is not addressed by any homes in the Plan-area;
- The LUA is not defined solely as a vehicle to meet unmet need alone, but because of the merits of that area (see paragraph 4.13 of the Local Plan);
- Even if unmet need was focused against the Urban Area, the spatial strategy is then undermined by the distribution of development more broadly which directs developments to less sustainable locations and/or undefined sites, rather than maximising this inherently sustainable place.

2.22 As table 2 (and paragraph 4.8) of the Plan indicates, the distribution of development cannot only be understood by reference to the 'new' allocations, but through the overall amount of development proposed. In table 2, completions, commitments and new growth are shown to contribute 14,839 dwellings during the plan-period. We note:

- 2,918 dwellings are in the area 'Adjoining Leicester Urban Area';
- That contrasts with 6,596 at the market towns and 2,820 at large villages;
- This is a Plan which relies on a very comparable level in the highest tier of the settlement hierarchy, as it does in the third tier;
- The overall level of growth at the highest tier, in the place that the Plan is so effusive about, is substantially lower (less than half) of that at the market towns (second tier);
- The level of growth at the highest tier (2,918) is ~19.66% of the total (14,839);
- The level of growth at the second tier (6,596) is ~44.45% of the total; and
- The level of growth at the third tier (2,820) is 19% of the total; and
- In combination, the level of growth at medium and small villages (1,862) is ~12.5% of the total.

- 2.23 These figures demonstrate that the highest tier in the settlement hierarchy receives a level of growth broadly equivalent to the third tier and less than half that directed to the second tier. The location presented by the Plan as the most sustainable location for growth receives less than one-fifth of all growth.
- 2.24 The Council's decision to direct growth towards the large, medium and small villages (amounting to 3,972 dwellings in total) is significantly more than the growth in the LUA. This is disproportionate and inappropriate, given the availability of other deliverable sites in the LUA, including land off Uppingham Road, Bushby, and contradicts the overall development strategy.
- 2.25 That outcome is difficult to reconcile with the Plan's own evidence and justification. If development is to be focused on locations with the greatest accessibility to public transport, the closest relationship to Leicester's employment opportunities, and the strongest potential to reduce travel demand, a materially greater proportion of growth should be directed to the LUA, reducing reliance on less sustainable settlements. The current distribution of development does not reflect those objectives and is inconsistent with the spatial strategy.

Word count: 1,153

### **Issue 3: Housing Need and Requirement**

**Question 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 PQ 16 confirms that its latest calculation of LHN is in 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].**

- 2.26 Since the Standard Method already accounts for affordability and past delivery, we submit that any further adjustments reducing the Council's need, and therefore requirement, would be inappropriate.
- 2.27 This is particularly critical given the current calculation is based on the 2022 LHN and there has been a substantial increase in standard method derived LHN since that time, with the current LHN for HDC calculated as 755dpa. Accounting for previous over-delivery could suppress the need and requirement further.

Word count: 78 words

#### **Issue 4: Leicester City's Unmet Need**

**Question 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?**

- 2.28 The apportionment of Leicester City's unmet need was agreed with the Leicestershire authorities, including HDC, in the Leicester & Leicestershire Authorities - Statement of Common Ground (SoCG), June 2022.
- 2.29 This excludes any assumed unmet need from Leicester City during the final years of the HDC plan. The level of unmet need was calculated based on the proposed plan period for Leicester City<sup>3</sup>, 2020 to 2036, at the time of the June 2022 SoCG being agreed. Although the NPPF 2026 does not require the 35% urban uplift, we still anticipate that there will be unmet need from Leicester City in the later years of the HDC plan, which is also an assumption in the Leicester and Leicestershire Strategic Growth Plan.
- 2.30 The matter of unmet need for the remainder of the HDC proposed plan period (2036 to 2041) is identified as a point not agreed in the Leicester City Council and Harborough District SoCG relating to Leicester City Council's Regulation 19 representations April 2026.
- 2.31 Should there be a delay in delivery towards meeting Leicester City's needs from across the HMA or should other authorities experience delays with their plans/agreement to any updates to the SoCG, HDC will be the most suitable and sustainable location to accommodate this unmet need in close proximity to where the need arises, and specifically within the LUA.

Word count: 235

**Question 2: Should the Plan's housing requirement include provision for unmet need beyond 2036? Has Leicester City's unmet need beyond 2026 been quantified through the local plan process? In the absence of robust evidence justifying Leicester City's capacity, is there robust evidence to support such an approach?**

- 2.32 At the current time, the standard method derived local housing need for Leicester City is 1,631 dwellings per annum. Over the remaining five-year period of the HDC Local Plan (2036 to 2041), notwithstanding any increase to the plan period, this would equate to a need of 8,155 dwellings for the City. This also assumes that there is no delay to the delivery of sites identified in the adopted Local Plan for the City, or the delay to the delivery of homes to meet the apportioned unmet need from other Leicestershire authorities. Should there be delays, we would anticipate that this figure would increase.
- 2.33 In light of the above and given the geographical relationship between HDC and Leicester City, and the number of available and suitable sites within the LUA, it is considered that HDC can and should be making a contribution to meet the future needs of Leicester in the last five years of the plan.

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<sup>3</sup> The Leicester City Local Plan was adopted in June 2026.

Word count: 159

### **Issue 5: Housing Supply**

**Question 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 this approach. [ID: 68-012-20190722].**

**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?**

- 2.34 The PPG<sup>4</sup> is clear about the circumstances where a stepped requirement may be justified.
- 2.35 In this situation the 'step' is downward, with a requirement (in the submission Local Plan) of 657 dpa between 2020 and 2036, reducing to 534 dpa between 2036 and 2041. In our view, this approach is entirely justified and reasonable as it addresses the currently identified unmet needs of the City within the period which they arise. To extend (via a flat trajectory) would simply delay meeting those needs. Given the circumstances, delaying those unmet needs would fail to support the City's economic growth and the agenda in the Leicester and Leicestershire Strategic Growth Strategy to make Leicester a "central city", thereby supporting economic and employment growth. The impact of the delay to delivery would be felt by those in the greatest need, namely those who require access to affordable housing.

Word count: 157

**Question 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?**

- 2.36 This response is also partly relevant to Issue 6, Question 1.
- 2.37 Given the passage of time, our response to this is informed by the trajectory included in Appendix 5 of the Local Plan, as per the Appendix 1 to the Council's response to Panel Note 2 which provides a 'Schedule of Proposed Modifications amended following PN2' (HDC2).
- 2.38 If all of the Council's inputs to Appendix 1 to HDC2 are correct, then the Council's position appears to now be that 15,319 dwellings would be delivered, against a requirement of 13,182 during the Plan period. That supply includes dwellings from

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<sup>4</sup> Paragraph: 012 Reference ID: 68-021-20190722, Revision date: 22 07 2019

windfall (450) and small villages (350 (or 345 unrounded)) which we do not consider to be justified.

- 2.39 Using 2027/28 as ‘year one’ Appendix 1 to HDC2 shows that HDC claims a supply of 3,658 dwellings in the forthcoming five-year period. Over the same period the requirement (with a 5% buffer) would be 3,449. With the exclusion of the windfalls in 2031/32 and the 117 dwellings from small villages, that supply falls to 3,541. This is a marginal position.
- 2.40 Appendices 3 and 4 to HDC2 include details on the various sites, including their planning status and the delivery rates. However, we cannot find any evidence to:
- Show the developer or promoter’s expectations of delivery, even where there are Statements of Common Ground, and how these intentions have been scrutinised.
  - Where applications have been submitted, any explanation as to their status, outstanding matters and the prospects / timescales for permission being granted.
- 2.41 Guidance<sup>5</sup> published on 1<sup>st</sup> June 2026 set out the Government’s expectations regarding the evidence required in relation to demonstrating housing land supply in relation to Local Plans proceeding under the ‘legacy’ system. We have copied that guidance to **Appendix 3**.
- 2.42 That guidance states that templates should be completed for every allocation included in the plan that proposes residential development (and for any sites which are not allocations by which are assumed to contribute to the five-year supply following the intended date of adoption).
- 2.43 The guidance explains that *“Start dates and build out rates should be realistic, having regard to developer intentions but also evidence relating to the timing of previous development on similar sites in the district and elsewhere in the country.”*
- 2.44 However, what the templates omit in this case is the critical detail required to scrutinise the delivery. For example, there is no written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates (for developable sites).
- 2.45 In effect, what the appendices to HDC2 demonstrate is what the Council hopes will happen, but this is not informed by any information from promoters (we note that there is reference to an SoCG in relation to MH2, MH3, OA1 and L1).

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<sup>5</sup> (<https://www.gov.uk/guidance/local-plans-housing-land-supply-evidence-december-2024-framework>)

- 2.46 Similarly, there is no evidence as to how the assumptions made in those appendices relate to any evidence of local or national lead in times or build out rates, or how the particular circumstances of a site may impact on the ability to deliver.
- 2.47 **Appendix 4** includes a series of brief comments explaining why, when national evidence (the Lichfield's 'Start to Finish' report (2024)) is applied, the Council's lead in times are overly optimistic. For the sake of clarity, and expediency, our analysis looks only at the proposed allocations in the Council's table at Appendix 1 of HDC2 (rather than all sources) and does not examine delivery rates (only lead in times). Our analysis excludes all such sites of less than 50 dwellings. That is not to say that the Council's evidence is justified in other respects.
- 2.48 Our analysis is simply presented to demonstrate the flaws in the Council's evidence which relies on a very high level analysis and does not provide the level of detail necessary to conclude when, and how, sites will deliver.
- 2.49 HDC's optimism inflates the extent to which sites will deliver, particularly in the earlier period after the Plan's adoption.
- 2.50 In our view, HDC's delivery trajectory, has been designed to try and indicate that a five-year supply would be maintained, but when any degree of scrutiny is applied, this is not the case.
- 2.51 **Appendix 5** of this Statement then replicates the Council's latest delivery trajectory (from Appendix 1 of HDC2), to show the effect of our revised delivery assumptions (alongside the removal of the windfall sources and small village requirement).
- 2.52 These adjustments in our **Appendix 5** utilise Lichfield's evidence in light of the lack of any equivalent information from HDC to support their assumptions.
- 2.53 The Inspectors will note that all our calculations do is delay a number of the new allocations (but do not dispute delivery rates, or the inclusion of any site in particular) and remove the windfalls and small village requirement.
- 2.54 **Appendix 5** shows (in green) where an application has been submitted, permission granted, or when we assume permission is granted. Yellow cells show when we assume applications would be submitted. The orange cells show when HDC expects sites to commence.
- 2.55 The result is that the Plan-supply then supports housing supply as shown in the table below (with no adjustments for previous over or under supply). In that scenario, there remains a housing land supply shortfall for a number of years following the adoption of the Plan, before the key new allocations deliver greater numbers in the next decade.

**Table 2.1: HDC's Housing Land Supply Position with Turley Deductions**

| 2027/28 | 2028/29 | 2029/30 | 2030/31 |
|---------|---------|---------|---------|
| 3.52    | 3.89    | 4.37    | 4.73    |

- 2.56 We recognise that the Local Plan explains how any ‘oversupply’ will be deducted from the future requirement using the ‘Liverpool’ method (i.e. with oversupply spread over the remaining period). As table 2.3 below shows, the use of the Liverpool approach to oversupply does not ‘solve’ the problem and a housing supply shortfall remains for several years post adoption.

**Table 2.2: HDC's Housing Land Supply Position with Turley Deductions**

| 2027/28 | 2028/29 | 2029/30 | 2030/31 |
|---------|---------|---------|---------|
| 3.81    | 4.13    | 4.45    | 4.92    |

- 2.57 When these assumptions are applied:
- Using 2027/28 as the first year post-adoption, the baseline requirement would be 3,285, or 3,449 with a 5% buffer. Our table at **Appendix 2** shows there would be a deliverable supply of 2,395.
  - Using 2028/29 as the first year post-adoption, the baseline requirement would be 3,285, or 3,449 with a 5% buffer. Our table at **Appendix 2** shows there would be a deliverable supply of 2,431.
- 2.58 In both cases, the Local Plan would fail to provide a sufficient supply of specific deliverable sites for five-years.
- 2.59 Our table at **Appendix 5** shows how there would be a supply of 14,334 dwellings, against a requirement for 13,182. The issue of whether that is a sufficient buffer could be a matter of soundness as the extent to which it has been demonstrated that those sites are deliverable and developable will need to be taken into account.

Word count: 1,155

**Question 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 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?**

- 2.60 In our view, if this approach were adopted, the Plan period would need to be rebased.

Word count: 17

**Question 5: NPPF paragraph 72 expects that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable 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?**

- 2.61 We can find no explanation in the evidence base to support the windfall allowance of 450 homes in the Local Plan supply from 2031 to 2041.

- 2.62 There is no such evidence in the SHELAA Assessment Update Feb 2024 (HSG-NLP 4) or the Housing Numbers Topic Paper April 2026 (TPC-NLP 7) for example (or any of the other evidence documents in the examination library).
- 2.63 The inclusion of a windfall allowance appears to be a constant theme throughout many of the evidence documents, but no supporting evidence to justify this is provided.
- 2.64 Just because windfalls have occurred, that does not indicate that they will continue to do so.
- 2.65 Consequently, the inclusion of a windfall allowance has not been justified and should be excluded.

Word count: 126

**Question 6: The Plan's housing supply includes a small villages requirement. That is made up of completions 2020-2023, commitments (at 1 April 2023), and new growth through this Plan of 350 homes. Plan paragraph 4.16 outlines that small villages have housing targets. What is the robust evidence to justify these housing targets?**

- 2.66 Aside from the 'evidence' to justify the inclusion of 350 homes from small villages, clarification is required as to how these dwellings (aside from any commitments and completions) are to be delivered.
- 2.67 Paragraph 6.4 of the Housing Numbers Topic Paper April 2026 (TPC-NLP 7) states "The Submission Local Plan allocations comprise a mix of sites of all sizes to maintain sufficient supply of homes across the plan period. This includes large strategic sites allocations at Land South of Gartree Road and proportionate extensions to Market Towns and large and medium villages." Taken at face value, the 350 dwellings (beyond commitments and completions) are not proposed allocations and therefore appear to comprise windfall sources.
- 2.68 We note the trajectory allows for 23 dwellings per annum from this 'small villages requirement' (totalling 345, rather than 350). This may seem a small disparity (but a difference nonetheless), but we note the Council anticipates a consistent delivery rate, suggesting that there is little information or certainty regarding this source.

Word count: 167

#### **Issue 6: Five-Year Housing Land Supply**

**Question 1: NPPF paragraph 69 requires that the Plan identifies a supply of specific, deliverable sites for 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 Panel's PQs [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?**

- 2.69 **Appendix 5** of this Statement includes an updated version of the trajectory appended to document HDC2.

- 2.70 Appendix 5 utilises the same delivery assumptions as the Council does and shows the rolling housing land supply position from 2027 / 2028 onwards (for this purpose, this is assumed to be 'year 1 post adoption').
- 2.71 Our calculation shows a position without any adjustments being made to the five-year requirement to reflect previous delivery (Scenario A). In this scenario, the Council's five-year supply calculation includes 117 dwellings from small villages, however as far as we can tell the source of this supply is unknown and should therefore be excluded (they would not satisfy limb A or B of the NPPF definition of 'deliverable').
- 2.72 If these dwellings from the small village sources are removed (alongside the removal of the windfall allowance), the Council would only have a very marginal five-year supply (without any other changes being made). The lack of evidence regarding the delivery of other sources is of critical concern.
- 2.73 **Appendix 5** demonstrates that the Local Plan will not support a five-year supply of deliverable housing sites.

Word count: 188

**Appendix 1: Extract from the Inspector's Report  
to the Cherwell Local Plan 2011 -  
2031 (Part 1) Partial Review –  
Oxford's Unmet Housing Need  
(Paragraph 46)**

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# **Report to Cherwell District Council**

**by Paul Griffiths BSc(Hons) BArch IHBC**

**an Inspector appointed by the Secretary of State**

**Date: 6 August 2020**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Cherwell Local Plan 2011 - 2031 (Part 1) Partial Review – Oxford's Unmet Housing Need**

The Plan was submitted for examination on 5 March 2018

The examination hearings were held on 28 September 2018 and 5, 6, 12 and 13 February 2019

File Ref: PINS/C3105/429/5

maximises the potential to create travel patterns that obviate the need for the use of the private car. Further, (most of) the sites would place affordable housing designed to meet Oxford's needs as close as practicable to the city, along a line of communication (the A44) that would facilitate easily accessible means of travelling into the city by bus or cycling.

42. It is important too that, separated from the centres of development in the Cherwell Local Plan 2015 and Banbury, Bicester and RAF Upper Heyford in particular, these sites are unlikely to have a significant impact on the delivery of housing designed to meet Cherwell's own needs.

### *Conclusion*

43. Taking all these points together, the vision and spatial strategy of the Plan have been positively prepared; they are justified; and likely to be effective. That said, most of the sites identified lie within the Oxford Green Belt and if adopted, the Plan will result in areas of land being removed from the Green Belt. I turn to that issue next.

### **Issue 3: Are the exceptional circumstances necessary to justify the alterations to Green Belt boundaries proposed in the Plan in place so that the Plan is consistent with national policy?**

44. Paragraph 83 of the Framework says that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Evidently, in preparing a Plan that proposes changes to the boundaries of the Oxford Green Belt, the Council has met the second part of that requirement.
45. In relation to the first part, there a number of factors in play that combined, lead me to the firm conclusion that the exceptional circumstances necessary to justify the alterations proposed to Green Belt boundaries have been demonstrated.
46. Chief amongst these is the obvious and pressing need to provide open-market and affordable homes for Oxford; a need that Oxford cannot meet itself. On top of that, in seeking to accommodate their part of Oxford's unmet need, the Council has undertaken a particularly rigorous approach to exploring various options. That process has produced a vision and a spatial strategy that is very clearly far superior to other options. There is a simple and inescapable logic behind meeting Oxford's open market and affordable needs in locations as close as possible to the city, on the existing A44/A4260 transport corridor, with resulting travel patterns that would minimise the length of journeys into the city, and not be reliant on the private car. On top of that, existing relationships with the city would be nurtured. Finally, this approach is least likely to interfere with Cherwell's own significant housing commitments set out in the Local Plan 2015.
47. It is important to note too the scale of what is proposed. The Oxford Green Belt in the District of Cherwell covers 8,409 Ha. As submitted, and I come on to further removals below, the Plan makes provision in Policy PR3 for the removal of 253 Ha, a reduction of 3%. That is a relatively small reduction that

**Appendix 2: Extract from the Inspector's Report  
on the Examination of the South  
Oxfordshire Local Plan 2011-2034  
(paragraph 91)**

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# **Report to South Oxfordshire District Council**

**by Jonathan Bore MRTPI**

**an Inspector appointed by the Secretary of State**

**Date: 27 November 2020**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the South Oxfordshire Local Plan 2011-2034**

The Plan was submitted for examination on 29 March 2019

The examination hearings were held between 14 July 2020 and 7 August 2020

File Ref: PINS/Q3115/429/6

89. Restricting the size of the Green Belt releases solely to the anticipated built areas would not be appropriate, partly because the boundaries of the built areas are not yet known and will be defined through future masterplans, and partly because such an approach would fail to take into account important related features of the allocation that must be implemented along with the development, including necessary infrastructure, landscaping, buffer zones and mitigation measures.
90. The overall integrity and purpose of the Oxford Green Belt would remain and would be protected by Policy STRAT6. To bring the policy into line with the NPPF, **MM9** indicates that the strategic allocations should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land, with measures supported by evidence of landscape, biodiversity or recreational needs and opportunities.

### *Conclusions on Issue 2*

91. The plan seeks to meet overall development needs in the right places through a logical and evidence based spatial strategy. The spatial strategy meets Oxford's unmet housing need close to where it arises in well-chosen sites which encourage sustainable movement. It allocates appropriate housing and employment sites within the Science Vale area to support the economic growth of that area, it provides housing where it is needed, and it takes advantage of and supports the infrastructure improvements unlocked by the Housing Investment Fund. It makes the best use of previously developed land. A proportionate approach is taken towards growth at the market towns and the villages. The spatial strategy has innate logic and integrity and is supported by an extensive evidence base. Alternatives have been fully evaluated over a period of several years.
92. The spatial strategy requires land to be removed from the Green Belt to allow for all but one of the strategic allocations. The evidence demonstrates that the appropriate exercise under NPPF paragraph 137 has been carried out and all reasonable non-Green Belt options for meeting the identified need for development have been examined. The alternatives would locate development in the wrong places, resulting in longer journeys, higher costs, additional pollution, and additional pressure on existing settlements and their facilities; they would promote much less sustainable development patterns and would not address the area's pressing housing needs and housing affordability issues.
93. The allocations are of a size that can support employment, a range of facilities, public transport, cycling and walking connections and the necessary highway infrastructure to mitigate the impact of development. The spatial strategy both supports and responds to planned and funded infrastructure improvements and supports the potential for other improvements.
94. Subject to the main modification described above, the spatial strategy is appropriate having regard to the alternatives, logical, justified on the evidence, integrated and sound.

**Appendix 3:    Guidance: Local plans: housing land  
supply evidence (December 2024  
Framework)**

## Guidance

# Local plans: housing land supply evidence (December 2024 Framework)

This note includes templates that local planning authorities may wish to use (in the legacy system) to provide evidence about the housing land supply in a local plan in the context of relevant national policy and guidance.

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From: **Planning Inspectorate**  
**(/government/organisations/planning-inspectorate)**

Published: 1 June 2026

**Applies to England**

## Contents

- National policy
- Developable sites
- Deliverable sites
- Templates

## National policy

The National Planning Policy Framework (NPPF) at paragraph 72 states that planning policies should identify a supply of:

- a) specific, **deliverable** sites for five years following the intended date of adoption (with an appropriate buffer); and
- b) specific, **developable** sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

## Developable sites

To be considered developable, sites 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.

PPG ID: 68-020-20190722 advises that in demonstrating that there is a reasonable prospect, plan-makers can use evidence such as (but not exclusively):

- written commitment or agreement that relevant funding is likely to come forward within the timescale indicated, such as an award of grant funding;
- written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- likely buildout rates based on sites with similar characteristics; and
- current planning status - for example, a larger scale site with only outline permission where there is supporting evidence that the site is suitable and available, may indicate development could be completed within the next 6-10 years.

## Deliverable sites

To be considered deliverable, sites 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 five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (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).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

For sites that fall within the definition in (b) above, PPG ID: 68-007-20190722 advises that clear evidence 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.

## Templates

The templates should be completed for every allocation included in the plan that proposes residential development.

A template should also be completed for any sites that are not allocations in the plan but are assumed to contribute towards the five year supply following the intended date of adoption. It should be assumed that the plan will be adopted no earlier than one year after the date on which it is submitted for examination, and that the 15 year period starts on the 1 April following the date of adoption. So, for example, if a plan is submitted for examination in August 2026, year 1 following adoption would start 1 April 2028.

Relevant, up-to-date evidence as referred to above should be summarised succinctly for each site in the relevant part of the template. This should be proportionate to whether the site is considered “deliverable” or “developable”.

Start dates and build out rates should be realistic, having regard to developer intentions but also evidence relating to the timing of previous development on similar sites in the district and elsewhere in the country.

For non-major housing sites with planning permission that are anticipated to be part of the five year supply, local planning authorities may wish to provide information in summary form in the small sites summary template, a link to which is provided below.

### Local plan housing land supply template

([https://assets.publishing.service.gov.uk/media/6a16f3aeb95db968c8f3bb23/Housing\\_land\\_supply\\_template-word.CFI.docx](https://assets.publishing.service.gov.uk/media/6a16f3aeb95db968c8f3bb23/Housing_land_supply_template-word.CFI.docx))

MS Word Document, 28.1 KB

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### Local plan housing land supply template

([https://assets.publishing.service.gov.uk/media/6a16f3ef050971fbeb3bb1f/Housing\\_land\\_supply\\_template\\_WF\\_March\\_2026.pdf](https://assets.publishing.service.gov.uk/media/6a16f3ef050971fbeb3bb1f/Housing_land_supply_template_WF_March_2026.pdf))

PDF, 75.1 KB, 1 page

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### Local plan small sites summary template

([https://assets.publishing.service.gov.uk/media/6a16f40d65bc5f798327f3cf/Small\\_sites\\_template.word.CFI.docx](https://assets.publishing.service.gov.uk/media/6a16f40d65bc5f798327f3cf/Small_sites_template.word.CFI.docx))

MS Word Document, 20.4 KB

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### Local plan small sites summary template

([https://assets.publishing.service.gov.uk/media/6a16f41c65bc5f798327f3d0/Small\\_sites\\_template.word.CFI.pdf](https://assets.publishing.service.gov.uk/media/6a16f41c65bc5f798327f3d0/Small_sites_template.word.CFI.pdf))

PDF, 86.4 KB, 2 pages

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## Local plan small sites summary template

([https://assets.publishing.service.gov.uk/media/6a16f426916cd732dcdaabf4/small\\_sites\\_template\\_excel.cfi.xlsx](https://assets.publishing.service.gov.uk/media/6a16f426916cd732dcdaabf4/small_sites_template_excel.cfi.xlsx))

MS Excel Spreadsheet, 10.8 KB

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## Appendix 4: Comments on New Allocations

- Site TB1: HDC assumes delivery from 2028/29.
  - Appendix 3 to HDC2 indicates that an outline application (25/01615/OUT) has been submitted for up to 130 dwellings (in December 2025). The application remains undetermined. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 100 – 499 dwellings is 6 years (2.8 years for the planning approval period and 3.2 years from planning to delivery). Our calculation assumes first completions in 2031/32.
  - No developer identified
- Site S1: HDC assumes delivery from 2030/31.
  - Appendix 3 to HDC2 indicates that an outline application (26/00289/OUT) has been submitted for up to 950 dwellings (in March 2026). The application remains undetermined and is subject to a number of consultee comments which require further information. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 500 – 999 dwellings is around 5 years (3.4 years for the planning approval period and 1.5 years from planning to delivery). Our calculation assumes the first dwellings are delivered from 2031/32.
  - Application promoted by Davidsons and Jelson
- Site S2: HDC assumes delivery from 2028/29.
  - Appendix 3 to HDC2 indicates that an outline application (25/00767OUT) has been submitted for up to 200 dwellings (in March 2026) and is approved, subject to a S106. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 100 – 499 dwellings is 6 years (2.8 years for the planning approval period and 3.2 years from planning to delivery). Our calculation assumes the permission would be granted this year (2026/27) and around 3 years to first completions in 2029/30.
  - Application promoted by Bloor Homes
- Site OA1: HDC assumes delivery from 2033/34.
  - Appendix 3 to HDC2 indicates that the site was not (in June 2026) subject to an application, but that "Contact with developer is underway. Planning Performance Agreements have been prepared between the landowner and two LPAs (Harborough District Council and Oadby and Wigston

Borough Council)”. No timescales are given for the submission of the application. Document HDC 4C is a SoCG in relation to this site, but this does not indicate when an application is likely to be submitted, or include a trajectory, or discussion over the delivery during the Plan-period. The Lichfield’s ‘Start to Finish’ report (2024) indicates that the ‘median average timeframes from validation of the first application to completion of the first dwelling’ for schemes of 1,000 – 1,499 dwellings is 6.2 years (4.9 years for the planning approval period and 1.3 years from planning to delivery). Given the scale of the proposal, our calculation assumes that an application is submitted in 2028/29 and that the first completions would occur around 6 years later in 2034/35.

- Site promoted by Homes England and Urban & Civic – no housebuilder involved
- Site L1: HDC assumes delivery from 2028/29.
  - Appendix 3 to HDC2 indicates that an application (26/00447/FUL) has been submitted for up to 230 dwellings (submitted April 2026). The application is undetermined. The Lichfield’s ‘Start to Finish’ report (2024) indicates that the ‘median average timeframes from validation of the first application to completion of the first dwelling’ for schemes of 100 – 499 dwellings is 6 years (2.8 years for the planning approval period and 3.2 years from planning to delivery). Our calculation assumes the first completions would occur around 6 years post submission in 2023/33.
  - Recent planning application submitted by William Davis Homes.
- Site L2: HDC assumes delivery from 2026/27.
  - Appendix 3 to HDC2 indicates that an outline application (25/00746/OUT) for up to 90 dwellings approved (subject to S106 agreement). This was granted in August 2026. However, the Council’s trajectory includes delivery in 2026/27. Our calculation allows for delivery from 2028/29, thus allowing for the determination of reserved matters, the discharge of conditions and so on.
  - No developer identified
- Site MH1: HDC assumes delivery from 2028/29.
  - Appendix 3 to HDC2 indicates that no applications have been submitted (as at June 2026) and does not indicate when they are expected to be submitted. The Lichfield’s ‘Start to Finish’ report (2024) indicates that the ‘median average timeframes from validation of the first application to completion of the first dwelling’ for schemes of 100 – 499 dwellings is 6 years (2.8 years for the planning approval period and 3.2 years from planning to delivery). Our calculation assumes an application is submitted in 2027/28 and that the first dwellings are delivered 6 years later (2033/34).

- Site promoted by Jelson
- Site MH2: HDC assumes delivery from 2033/34. As of June 2026, no applications have been submitted. Document HDC 4D includes a SoCG 'Relating to swapping land uses between allocations MH2 East of Market Harborough Road & MH3 Land south of Gallow Field Road'. There is nothing in that SoCG to indicate when an application will be forthcoming, or in relation to how the quantum of development would be achieved. Our analysis assumes an application is submitted in 2028/29. On the basis of the Lichfields' analysis, we do not amend the lead-in time for this site.
  - Site promoted by William Davis / Hallam Land
- Site MH3: HDC assumes delivery from 2031/32.
  - As of June 2026, no applications have been submitted. Document HDC 4D includes a SoCG 'Relating to swapping land uses between allocations MH2 East of Market Harborough Road & MH3 Land south of Gallow Field Road'. There is nothing in that SoCG to indicate when an application will be forthcoming, or in relation to how the quantum of development would be achieved. Our analysis assumes an application is submitted in 2028/29. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 500 – 999 dwellings is around 5 years (3.4 years for the planning approval period and 1.5 years from planning to delivery). Our calculation assumes the first dwellings are delivered from 2031/32.
  - Site promoted by William Davis / Hallam Land
- Site BA1: HDC assumes delivery from 2030/31.
  - An application (26/00480/OUT) has been submitted for up to 550 dwellings in March 2026 but is undetermined and subject to a National Highways response (for example) stating that permission should not be granted for a specified period in order to allow the applicant to provide further information. Using the median average from Lichfields (3.4 years for the planning approval period and 1.5 years from planning to delivery) for a scheme of this size, we have delayed first completions to 2031/32.
  - Site promoted by IM Land. No housebuilder identified.
- Site F1: HDC assumes delivery from 2028/29.
  - An application (25/00515/OUT) has been submitted for up to 170 dwellings and is subject to a resolution to grant. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 100 – 499 dwellings is 6 years (2.8 years for the planning approval period and 3.2 years from planning to delivery). Our calculation

assumes the application is permitted submitted in 2026/27 and that the first dwellings are delivered around 3 years later (2029/30).

- Recent application submitted by David Wilson Homes
- Site GG1: HDC assumes delivery from 2030/31.
  - An application (25/01467/OUT) has been submitted for up to 450 dwellings. The application is subject to numerous objections and comments from consultees which seek additional information. No material has been submitted in around six months. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 100 – 499 dwellings is 6 years (2.8 years for the planning approval period and 3.2 years from planning to delivery). Our calculation assumes an application is submitted in 2026/27 and that the first dwellings are delivered 6 years later (2031/32).
  - Recent application submitted by Davidsons
- Site K1: HDC assumes delivery from 2030/31.
  - Appendix 3 to HDC2 indicates that no applications have been submitted (as at June 2026) and does not indicate when they are expected to be submitted (although an EIA Scoping Opinion has been issued and public consultation was held in April 2026. We understand that an application is imminent. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 100 – 499 dwellings is 6 years (2.8 years for the planning approval period and 3.2 years from planning to delivery). Our calculation assumes an application is submitted in 2026/27 and that the first dwellings are delivered 6 years later (2032/33).
  - Site promoted by Manor Oak Homes
- Site B1: Below the 50 unit threshold of our analysis.
- Site B2: Below the 50 unit threshold of our analysis.
- Site B3: Below the 50 unit threshold of our analysis.
- Site GB1: Below the 50 unit threshold of our analysis.
- Site GB2: HDC assumes delivery from 2028/29.
  - Appendix 3 to HDC2 indicates that no applications have been submitted (as at June 2026) and does not indicate when they are expected to be submitted. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 50 – 99 dwellings is 3.8

years (1.5 years for the planning approval period and 2.3 years from planning to delivery). Our calculation assumes an application is submitted in 2027/28 and that the first dwellings are delivered 4 years later (2031/32).

- No developer identified.
- Site HH1: HDC assumes delivery from 2028/29.
- An application (25/00599/OUT) has been submitted for up to 80 dwellings and is subject to a resolution to grant subject to S106 Agreement and resolution of outstanding drainage matters. The latest response from the LLFA recommended that conditions be applied. If the application is now granted prior to the end of s026/27, our calculation assumes delivery delayed to 2029/30.
  - Site promoted by Clarendon Land and Development. No housebuilder identified.
- Site HH2: Below the 50 unit threshold of our analysis.
- Site HB1: HDC assumes delivery from 2029/30.
  - An application (26/00470/OUT) has been submitted for up to 150 dwellings in March 2026, but this is undetermined and is subject to numerous consultee comments. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 100 – 499 dwellings is 6 years (2.8 years for the planning approval period and 3.2 years from planning to delivery). Our calculation assumes an application is submitted in 2027/28 and that the first dwellings are delivered 6 years later (2033/34).
  - Site promoted by Catesby Strategic. No housebuilder identified
- Site U1: Below the 50 unit threshold of our analysis.
- Site U2: HDC assumes delivery from 2028/29.
  - Appendix 3 to HDC2 indicates that no applications have been submitted (as at June 2026) and does not indicate when they are expected to be submitted. The Lichfield's 'Start to Finish' report (2024) indicates that the 'median average timeframes from validation of the first application to completion of the first dwelling' for schemes of 50 – 99 dwellings is 3.8 years (1.5 years for the planning approval period and 2.3 years from planning to delivery). Our calculation assumes an application is submitted in 2027/28 and that the first dwellings are delivered 4 years later (2031/32).
  - Site promoted by Leicestershire County Council. No housebuilder identified

## **Appendix 5: Turley's Revised Housing Trajectory**

## APPENDIX 2: Deliverable Sites 1 April 2028 - 31 March 2033 (data as of 31 March 2025)

**Note 1:** Sites that are not anticipated to deliver in the 2028-33 5 year period are not listed below.

**Note 2:** The Local Plan housing trajectory also accounts for Windfall (90 units) and the Small Villages Requirement (117 units) during the 2028-33 5 year period (these sources are not site specific but have been included below).

**Note 3:** The Local Plan housing trajectory shows that all minor sites are anticipated to complete by 31 March 2030.

**Note 4:** 222 units are anticipated to be delivered on minor sites in the 2028-33 5 year period which all have planning permission.

| REFERENCE                                                | ADDRESS                                                    | SITE TYPE                                                                                   | NET SUPPLY | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | Total 5 year net supply 2028-33 | Total 5 year net supply 2033-38 | Total 3 year net supply 2038-41 | Total net supply in plan period 2020-41 |
|----------------------------------------------------------|------------------------------------------------------------|---------------------------------------------------------------------------------------------|------------|---------|---------|---------|---------|---------|---------|---------|---------|---------------------------------|---------------------------------|---------------------------------|-----------------------------------------|
| 19/00250/OUT<br>(Policy L1 2011-2031 Adopted Local Plan) | Land East of Lutterworth                                   | OUTLINE MAJOR                                                                               | 2,750      |         |         |         |         |         |         | 150     | 150     | 300                             | 750                             | 450                             | 1500                                    |
| 23/01104/OUT                                             | Gaulby Road                                                | OUTLINE MAJOR                                                                               | 48         |         |         | 16      | 16      | 16      |         |         |         | 32                              | 0                               | 0                               | 48                                      |
| 22/01090/OUT                                             | Industrial Brushes Ltd, 103 Bath Street, Market Harborough | OUTLINE MAJOR                                                                               | 18         |         |         | 6       | 6       | 6       |         |         |         | 12                              | 0                               | 0                               | 18                                      |
| NP/GRTE/01                                               | Rear of 2 High Street, Great Easton                        | Neighbourhood plan allocation: Neither permitted, allocated in the local plan, nor windfall | 11         |         |         | 4       | 4       | 3       |         |         |         | 7                               | 0                               | 0                               | 11                                      |
| NP/20/GG/01                                              | Land north of Glen House, Great Glen                       | Neighbourhood plan allocation: Neither permitted, allocated in the local plan, nor windfall | 10         |         |         | 4       | 4       | 2       |         |         |         | 6                               | 0                               | 0                               | 10                                      |
| NP/LUB/01                                                | Land north of Foxton Rd, Lubenham                          | Neighbourhood plan allocation: Neither permitted, allocated in the local plan, nor windfall | 27         |         | 7       | 7       | 7       | 6       |         |         |         | 13                              | 0                               | 0                               | 27                                      |
| NP/18/MED/01                                             | NDP Site 1: Station House Livery Yard, Medbourne           | Neighbourhood plan allocation: Neither permitted, allocated in the local plan, nor windfall | 12         |         |         | 4       | 4       | 4       |         |         |         | 8                               | 0                               | 0                               | 12                                      |
| NP/19/SKL/01                                             | Abattoir site, South Kilworth                              | Neighbourhood plan allocation: Neither permitted, allocated in the local plan, nor windfall | 10         |         |         | 4       | 4       | 2       |         |         |         | 6                               | 0                               | 0                               | 10                                      |

|                                                                    |                                                                                             |                                                                                                               |     |    |    |    |    |    |    |    |    |     |    |   |     |
|--------------------------------------------------------------------|---------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|-----|----|----|----|----|----|----|----|----|-----|----|---|-----|
| NP/18/SWN/02                                                       | Lutterworth Rd,<br>Swinford                                                                 | Neighbourhood<br>plan allocation:<br>Neither<br>permitted,<br>allocated in the<br>local plan, nor<br>windfall | 17  |    |    | 6  | 6  | 5  |    |    |    | 11  | 0  | 0 | 17  |
| NP/TUG/01                                                          | Harbrook Farm,<br>Tugby                                                                     | Neighbourhood<br>plan allocation:<br>Neither<br>permitted,<br>allocated in the<br>local plan, nor<br>windfall | 11  |    |    | 4  | 4  | 3  |    |    |    | 7   | 0  | 0 | 11  |
| NP/18/MED/03                                                       | NDP Site 3:<br>Manor Farm,<br>Hallaton Rd                                                   | Neighbourhood<br>plan allocation:<br>Neither<br>permitted,<br>allocated in the<br>local plan, nor<br>windfall | 4   |    |    | 2  | 2  |    |    |    |    | 2   | 0  | 0 | 4   |
| NP/LGTN/01                                                         | Land at<br>Coopers<br>Cottages                                                              | Neighbourhood<br>plan allocation:<br>Neither<br>permitted,<br>allocated in the<br>local plan, nor<br>windfall | 4   |    |    | 2  | 2  |    |    |    |    | 2   | 0  | 0 | 4   |
| NP/LGTN/02                                                         | Land top of<br>Back Lane                                                                    | Neighbourhood<br>plan allocation:<br>Neither<br>permitted,<br>allocated in the<br>local plan, nor<br>windfall | 6   |    |    | 3  | 3  |    |    |    |    | 3   | 0  | 0 | 6   |
| 17/00257/REM                                                       | Land north of<br>Uppingham<br>Road, AKA<br>Land Part OS<br>8797,<br>Houghton on<br>the Hill | DETAILED<br>MAJOR                                                                                             | 70  | 7  | 7  | 7  | 7  | 6  |    |    |    | 13  | 0  | 0 | 64  |
| 17/00177/REM                                                       | William Davis<br>Parcel: Land at<br>Airfield Farm,<br>Market<br>Harborough                  | DETAILED<br>MAJOR                                                                                             | 445 | 27 | 27 | 27 | 27 | 27 | 27 | 27 | 27 | 135 | 41 | 0 | 416 |
| 15/02006/OUT<br>(Policy MH1<br>2011-2031<br>Adopted Local<br>Plan) | Land Adj<br>Overstone Park,<br>Kettering Road,<br>Market<br>Harborough                      | DETAILED<br>MAJOR                                                                                             | 600 | 53 | 53 | 54 | 54 | 54 | 54 | 54 | 54 | 270 | 45 | 0 | 600 |
| 20/00891/FUL<br>(Policy MH2<br>2011-2031<br>Adopted Local<br>Plan) | MH2:Land At<br>Eady Drive,<br>Market<br>Harborough                                          | DETAILED<br>MAJOR                                                                                             | 350 | 57 | 57 | 57 | 57 | 57 | 8  |    |    | 122 | 0  | 0 | 350 |

|                                                                 |                                                                         |                 |     |   |   |    |    |    |    |     |     |     |     |     |     |
|-----------------------------------------------------------------|-------------------------------------------------------------------------|-----------------|-----|---|---|----|----|----|----|-----|-----|-----|-----|-----|-----|
| 21/02089/REM                                                    | Land north of High Acres, Uppingham Rd, Billesdon                       | DETAILED MAJOR  | 35  | 6 | 7 | 7  | 7  | 7  |    |     |     | 14  | 0   | 0   | 35  |
| 16/00579/FUL                                                    | Land East of Kates Hill Farm AKA Land east of Rolleston Road, Billesdon | DETAILED MAJOR  | 10  | 1 | 1 | 1  | 1  |    |    |     |     | 1   | 0   | 0   | 10  |
| 21/01493/FUL                                                    | Land At St Wilfrids Close, Kibworth                                     | DETAILED MAJOR  | 10  |   |   | 5  | 5  |    |    |     |     | 5   | 0   | 0   | 10  |
| 19/00853/FUL                                                    | Allotments, De verdon Rd, Lutterworth                                   | DETAILED MAJOR  | 72  |   |   | 24 | 24 | 24 |    |     |     | 48  | 0   | 0   | 72  |
| 20/00770/FUL                                                    | Fisher German, 40 High Street, Market Harborough                        | DETAILED MAJOR  | 21  |   |   | 7  | 7  | 7  |    |     |     | 14  | 0   | 0   | 21  |
| 21/01519/FUL                                                    | Land To The West Of Leicester Road, Market Harborough                   | DETAILED MAJOR  | 19  |   |   | 7  | 7  | 5  |    |     |     | 12  | 0   | 0   | 19  |
| 20/00718/FUL                                                    | The Welland Quarter, St Marys Road, Market Harborough                   | DETAILED MAJOR  | 77  |   |   | 25 | 26 | 26 |    |     |     | 52  | 0   | 0   | 77  |
| 21/02224/FUL                                                    | 20 - 24 Church Road, Great Glen                                         | DETAILED MAJOR  | 14  |   |   | 5  | 4  | 5  |    |     |     | 9   | 0   | 0   | 14  |
| TB1: Land north of the A47, east of Zouche Way.                 | THURNBY & BUSHBY                                                        | ALLOCATION ONLY | 125 |   |   |    | 50 | 50 | 25 |     |     | 125 | 0   | 0   | 125 |
| S1: Land between Scraptoft & Bushby                             | SCRAPTOFT                                                               | ALLOCATION ONLY | 950 |   |   |    |    |    | 50 | 100 | 100 | 250 | 500 | 200 | 950 |
| S2: Land East of Beeby Road                                     | SCRAPTOFT                                                               | ALLOCATION ONLY | 175 |   |   |    | 50 | 50 | 50 | 25  |     | 175 | 0   | 0   | 175 |
| L1: Land off Leicester Road                                     | LUTTERWORTH                                                             | ALLOCATION ONLY | 230 |   |   |    | 50 | 50 | 50 | 50  | 30  | 230 | 0   | 0   | 230 |
| MH1: Land east of Leicester Road and south of Grand Union canal | MARKET HARBOROUGH                                                       | ALLOCATION ONLY | 250 |   |   |    | 50 | 50 | 50 | 50  | 50  | 250 | 0   | 0   | 250 |
| MH3: Land south of Gallow Field Road                            | MARKET HARBOROUGH                                                       | ALLOCATION ONLY | 600 |   |   |    |    |    |    | 30  | 50  | 80  | 400 | 120 | 600 |
| BA1: Land off Frolesworth Road                                  | BROUGHTON ASTLEY                                                        | ALLOCATION ONLY | 475 |   |   |    |    |    | 40 | 80  | 80  | 200 | 275 | 0   | 475 |

|                                                                            |                      |                 |       |     |     |     |     |     |     |     |     |       |       |     |       |
|----------------------------------------------------------------------------|----------------------|-----------------|-------|-----|-----|-----|-----|-----|-----|-----|-----|-------|-------|-----|-------|
| F1: Land north of Kilby Road and west of Longgreay                         | FLECKNEY             | ALLOCATION ONLY | 150   |     |     |     | 50  | 50  | 50  |     |     | 150   | 0     | 0   | 150   |
| GG1: Land to the North of London Road and east of Leicester Grammar School | GREAT GLEN           | ALLOCATION ONLY | 400   |     |     |     |     |     | 40  | 80  | 80  | 200   | 200   | 0   | 400   |
| K1: Land west of Warwick Road                                              | KIBWORTH             | ALLOCATION ONLY | 475   |     |     |     |     |     | 40  | 80  | 80  | 200   | 275   | 0   | 475   |
| B1: Land at Gaulby Road                                                    | BILLEDON             | ALLOCATION ONLY | 48    |     |     |     | 20  | 20  | 8   |     |     | 48    | 0     | 0   | 48    |
| B2: Billesdon Depot south of Gaulby Road                                   | BILLEDON             | ALLOCATION ONLY | 10    |     |     |     | 5   | 5   |     |     |     | 10    | 0     | 0   | 10    |
| B3: Former Lorry Park Gaulby Road                                          | BILLEDON             | ALLOCATION ONLY | 5     |     |     |     |     | 5   |     |     |     | 5     | 0     | 0   | 5     |
| GB1: Land north of Dingley Road                                            | GREAT BOWDEN         | ALLOCATION ONLY | 15    |     |     |     | 5   | 10  |     |     |     | 15    | 0     | 0   | 15    |
| GB2: Land off Dingley Road and Nether Green                                | GREAT BOWDEN         | ALLOCATION ONLY | 85    |     |     |     | 25  | 25  | 25  | 10  |     | 85    | 0     | 0   | 85    |
| HH1: Land north of Uppingham Road                                          | HOUGHTON ON THE HILL | ALLOCATION ONLY | 80    |     |     |     | 25  | 25  | 25  | 5   |     | 80    | 0     | 0   | 80    |
| HH2: Land north of Stretton Lane                                           | HOUGHTON ON THE HILL | ALLOCATION ONLY | 24    |     |     |     | 12  | 12  |     |     |     | 24    | 0     | 0   | 24    |
| HB1: Land east of Welford Road                                             | HUSBANDS BOSWORTH    | ALLOCATION ONLY | 105   |     |     |     |     | 50  | 50  | 5   |     | 105   | 0     | 0   | 105   |
| U1: Land south of Ashby Road                                               | ULLESTHORP E         | ALLOCATION ONLY | 30    |     |     |     | 15  | 15  |     |     |     | 30    | 0     | 0   | 30    |
| U2: Land north of Ashby Road                                               | ULLESTHORP E         | ALLOCATION ONLY | 50    |     |     |     | 25  | 25  |     |     |     | 50    | 0     | 0   | 50    |
| TOTAL:                                                                     |                      |                 | 8,933 | 151 | 159 | 288 | 670 | 707 | 592 | 746 | 701 | 3,416 | 2,486 | 770 | 7,648 |
| MINOR SITES:                                                               |                      |                 | 247   | 2   | 3   | 20  | 112 | 110 | 0   | 0   | 0   | 222   | 0     | 0   | 247   |
| SMALL VILLAGES REQUIREMENT:                                                |                      |                 |       |     | 23  | 23  | 23  | 23  | 23  | 23  | 23  | 117   | 117   | 70  | 350   |
| WINDFALL:                                                                  |                      |                 |       |     |     |     |     |     |     | 45  | 45  | 90    | 225   | 135 | 450   |
| OVERALL TOTAL:                                                             |                      |                 | 9,180 | 153 | 185 | 331 | 805 | 840 | 615 | 814 | 769 | 3,845 | 2,828 | 975 | 8,695 |

|                                                                                                               | 01/01/2021 | 01/01/2022 | 01/01/2023 | 01/01/2024 | 01/01/2025 | 01/01/2026 | 01/01/2027 | 01/01/2028 | 01/01/2029 | 01/01/2030 | 01/01/2031 | 01/01/2032 | 01/01/2033 | 01/01/2034 | 01/01/2035 | 01/01/2036 | 01/01/2037 | 01/01/2038 | 01/01/2039 | 01/01/2040 | 01/01/2041 | 01/01/2042 | 01/01/2043 | 01/01/2044 | 01/01/2045 | Total in Plan Period |
|---------------------------------------------------------------------------------------------------------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|----------------------|
| Plan period years remaining                                                                                   | 23         | 20         | 19         | 18         | 17         | 16         | 15         | 14         | 13         | 12         | 11         | 10         | 9          | 8          | 7          | 6          | 5          | 4          | 3          | 2          | 1          |            |            |            |            | 4,214                |
| Completions                                                                                                   | 1,010      | 1,026      | 929        | 758        | 491        |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |                      |
| Commitments at 01.04.2025: Sites with planning permission including Local and Neighbourhood Plan allocations. |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |                      |
| Commitments*                                                                                                  |            |            |            |            |            |            | 567        | 550        | 509        | 400        | 375        | 89         | 231        | 231        | 222        | 164        | 150        | 150        | 150        | 150        | 150        | 150        | 150        | 150        | 150        | 4,238                |
| Windfall Allowance                                                                                            |            |            |            |            |            |            |            |            |            |            |            |            | 45         | 45         | 45         | 45         | 45         | 45         | 45         | 45         | 45         | 45         | 45         | 45         | 45         | 430                  |
| Total Commitments and Windfall Allowance                                                                      |            |            |            |            |            |            | 567        | 550        | 509        | 400        | 375        | 89         | 276        | 276        | 267        | 209        | 195        | 195        | 195        | 195        | 195        | 195        | 195        | 195        | 195        | 4,668                |
| Total Completions, Commitments and Windfall Allowance                                                         | 1,010      | 1,026      | 929        | 758        | 491        | 567        | 550        | 509        | 400        | 375        | 89         | 276        | 276        | 267        | 267        | 209        | 195        | 195        | 195        | 195        | 195        | 195        | 195        | 195        | 195        | 8,902                |
| New Local Plan Allocations:                                                                                   |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |                      |
| TB1: Land north of the A47, east of Zouch Way (THURNBY & BUSHBY)                                              |            |            |            |            |            |            |            | 50         | 50         | 25         |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            | 125                  |
| S1: Land between Scraftoft & Bushby (SCRAFTOFT)                                                               |            |            |            |            |            |            |            |            |            | 50         | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 100        | 950                  |
| S2: Land east of Beeby Road (SCRAFTOFT)                                                                       |            |            |            |            |            |            |            | 50         | 50         | 50         | 25         |            |            |            |            |            |            |            |            |            |            |            |            |            |            | 175                  |
| GA1: Land south of Gartree Road & East of Dadby (DADBY - GLEN WARD)                                           |            |            |            |            |            |            |            |            |            |            |            |            |            | 150        | 150        | 150        | 150        | 150        | 150        | 150        | 150        | 150        | 150        | 150        | 1,200      |                      |
| L1: Land off Leicester Road (LUTTERWORTH)                                                                     |            |            |            |            |            |            |            | 50         | 50         | 50         | 50         | 30         |            |            |            |            |            |            |            |            |            |            |            |            |            | 230                  |
| L2: Land at M1, Junction 20/Swindford Road (LUTTERWORTH)                                                      |            |            |            |            |            |            | 40         | 50         |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            | 90                   |
| MH1: Land east of Leicester Road and south of Grand Union canal (MARKET HARBOUROUGH)                          |            |            |            |            |            |            |            | 50         | 50         | 50         | 50         | 50         |            |            |            |            |            |            |            |            |            |            |            |            |            | 250                  |
| MH2: East of Market Harborough Road (MARKET HARBOUROUGH)                                                      |            |            |            |            |            |            |            |            |            |            |            |            |            | 40         | 40         | 50         | 50         | 80         | 80         | 80         | 80         | 80         | 80         | 80         | 80         | 500                  |
| MH3: Land south of Gallowfield Road (MARKET HARBOUROUGH)                                                      |            |            |            |            |            |            |            |            |            |            |            |            | 30         | 50         | 80         | 80         | 80         | 80         | 80         | 80         | 80         | 40         |            |            |            | 600                  |
| BA1: Land off Frolesworth Road (BROUGHTON ASTLEY)                                                             |            |            |            |            |            |            |            |            |            |            | 40         | 80         | 80         | 80         | 80         | 80         | 35         |            |            |            |            |            |            |            |            | 475                  |
| F1: Land north of Kilby Road and west of Langney (LECKNEY)                                                    |            |            |            |            |            |            |            | 50         | 50         | 50         |            |            |            |            |            |            |            |            |            |            |            |            |            |            |            | 150                  |
| GG1: Land to the north of London Road and east of Leicester Grammar School (GREAT GLEN)                       |            |            |            |            |            |            |            |            |            |            | 40         | 80         | 80         | 80         | 80         | 40         |            |            |            |            |            |            |            |            |            | 400                  |
| K1: Land west of Warwick Road (BIBWORTH)                                                                      |            |            |            |            |            |            |            |            |            |            | 40         | 80         | 80         | 80         | 80         | 80         | 35         |            |            |            |            |            |            |            |            | 475                  |

[illegible][illegible]

|                                                                                                               | 2020/2021 | 2021/2022 | 2022/2023 | 2023/2024 | 2024/2025 | 2025/2026                      | 2026/2027 | 2027/2028          | 2028/2029          | 2029/2030 | 2030/2031 | 2031/2032 | 2032/2033 | 2033/2034 | 2034/2035 | 2035/2036 | 2036/2037 | 2037/2038 | 2038/2039 | 2039/2040 | 2040/2041 | Total In Plan Period |
|---------------------------------------------------------------------------------------------------------------|-----------|-----------|-----------|-----------|-----------|--------------------------------|-----------|--------------------|--------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|----------------------|
| Plan period years remaining                                                                                   | 21        | 20        | 19        | 18        | 17        | 16                             | 15        | 14                 | 13                 | 12        | 11        | 10        | 9         | 8         | 7         | 6         | 5         | 4         | 3         | 2         | 1         |                      |
| Completions                                                                                                   | 1,010     | 1,026     | 929       | 758       | 491       |                                |           |                    |                    |           |           |           |           |           |           |           |           |           |           |           |           | 4,214                |
| Commitments at 01.04.2025: Sites with planning permission including Local and Neighbourhood Plan allocations. |           |           |           |           |           |                                |           |                    |                    |           |           |           |           |           |           |           |           |           |           |           |           |                      |
| Commitments*                                                                                                  |           |           |           |           |           | 567                            | 550       | 509                | 400                | 375       | 89        | 231       | 231       | 222       | 164       | 150       | 150       | 150       | 150       | 150       | 150       | 4,238                |
| Windfall Allowance                                                                                            |           |           |           |           |           |                                |           |                    |                    |           |           | 0         | 0         | 0         | 0         | 0         | 0         | 0         | 0         | 0         | 0         | 0                    |
| Total Commitments and Windfall Allowance                                                                      |           |           |           |           |           | 567                            | 550       | 509                | 400                | 375       | 89        | 231       | 231       | 222       | 164       | 150       | 150       | 150       | 150       | 150       | 150       | 4,238                |
| Total Completions, Commitments and Windfall Allowance                                                         | 1,010     | 1,026     | 929       | 758       | 491       | 567                            | 550       | 509                | 400                | 375       | 89        | 231       | 231       | 222       | 164       | 150       | 150       | 150       | 150       | 150       | 150       | 8,452                |
|                                                                                                               |           |           |           |           |           |                                |           |                    |                    |           |           |           |           |           |           |           |           |           |           |           |           |                      |
| <a href="#">New Local Plan Allocations:</a>                                                                   |           |           |           |           |           |                                |           |                    |                    |           |           |           |           |           |           |           |           |           |           |           |           |                      |
| TB1: Land north of the A47, east of Zouche Way (THURNBY & BUSHBY)                                             |           |           |           |           |           | Application submitted December |           |                    | HDC START          |           |           | 50        | 50        | 25        |           |           |           |           |           |           |           | 125                  |
| S1: Land between Scraftoft & Bushby (SCRAPTOFT)                                                               |           |           |           |           |           | Application (March 2026)       |           |                    |                    |           | HDC START | 50        | 100       | 100       | 100       | 100       | 100       | 100       | 100       | 100       | 950       |                      |
| S2: Land east of Beeby Road (SCRAPTOFT)                                                                       |           |           |           |           |           | Assume permission granted.     |           |                    | HDC START          | 50        | 50        | 50        | 25        |           |           |           |           |           |           |           |           | 175                  |
| OA1: Land south of Gartree Road & East of Oadby (OADBY - GLEN WARD)                                           |           |           |           |           |           |                                |           |                    | Assume application |           |           |           |           | HDC START | 150       | 150       | 150       | 150       | 150       | 150       | 1,050     |                      |
| L1: Land off Leicester Road (LUTTERWORTH)                                                                     |           |           |           |           |           | Application (April 2026)       |           |                    | HDC START          |           |           |           | 50        | 50        | 50        | 50        | 30        |           |           |           |           | 230                  |
| L2: Land at M1 Junction 20/Swinford Road (LUTTERWORTH)                                                        |           |           |           |           |           | Permission granted HDC START   |           | 40                 | 50                 |           |           |           |           |           |           |           |           |           |           |           |           | 90                   |
| MH1: Land east of Leicester Road and south of Grand Union canal (MARKET HARBOROUGH)                           |           |           |           |           |           |                                |           | Assume application | HDC START          |           |           |           |           | 50        | 50        | 50        | 50        | 50        |           |           |           | 250                  |
| MH2: East of Market Harborough Road (MARKET HARBOROUGH)                                                       |           |           |           |           |           |                                |           |                    | Assume application |           |           |           |           | 40        | 40        | 50        | 50        | 80        | 80        | 80        | 340       |                      |
| MH3: Land south of Gallow Field Road (MARKET HARBOROUGH)                                                      |           |           |           |           |           |                                |           |                    | Assume application |           |           | HDC START |           | 30        | 50        | 80        | 80        | 80        | 80        | 80        | 560       |                      |
| BA1: Land off Frolesworth Road (BROUGHTON ASTLEY)                                                             |           |           |           |           |           | Application (March 2026)       |           |                    |                    |           | HDC START | 40        | 80        | 80        | 80        | 80        | 80        | 35        |           |           |           | 475                  |
| F1: Land north of Kilby Road and west of Longrey (FLECKNEY)                                                   |           |           |           |           |           | Assume permission granted.     |           |                    | HDC START          | 50        | 50        | 50        |           |           |           |           |           |           |           |           |           | 150                  |
| GG1: Land to the north of London Road and east of                                                             |           |           |           |           |           | Application submitted October  |           |                    |                    |           | HDC START | 40        | 80        | 80        | 80        | 80        | 40        |           |           |           |           | 400                  |
| Leicester Grammar School (GREAT GLEN)                                                                         |           |           |           |           |           |                                |           |                    |                    |           |           |           |           |           |           |           |           |           |           |           |           | 0                    |
| K1: Land west of Warwick Road (KIBWORTH)                                                                      |           |           |           |           |           | Assume application             |           |                    |                    |           | HDC START |           | 40        | 80        | 80        | 80        | 80        | 80        | 35        |           |           | 475                  |
| B1: Land at Gaulby Road (BILLESDON)                                                                           |           |           |           |           |           |                                |           |                    | 20                 | 20        | 8         |           |           |           |           |           |           |           |           |           |           | 48                   |
| B2: Billesdon Depot south of Gaulby Road (BILLESDON)                                                          |           |           |           |           |           |                                |           |                    | 5                  | 5         |           |           |           |           |           |           |           |           |           |           |           | 10                   |
| B3: Former Lorry Park Gaulby Road (BILLESDON)                                                                 |           |           |           |           |           |                                |           |                    |                    | 5         |           |           |           |           |           |           |           |           |           |           |           | 5                    |
| GB1: Land north of Dingley Road (GREAT BOWDEN)                                                                |           |           |           |           |           |                                |           |                    | 5                  | 10        |           |           |           |           |           |           |           |           |           |           |           | 15                   |
| GB2: Land off Dingley Road and Nether Green (GREAT BOWDEN)                                                    |           |           |           |           |           |                                |           | Assume application | HDC START          |           |           | 25        | 25        | 25        | 10        |           |           |           |           |           |           | 85                   |

HDC2 rates the same. Developer interest but not confirmed. Application, but not determined. 25/01615/OUT

|                                                             |      |      |     |     |     |     |                                 |     |           |     |     |       |     |     |     |     |       |     |     |     |     |       |        |     |
|-------------------------------------------------------------|------|------|-----|-----|-----|-----|---------------------------------|-----|-----------|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|--------|-----|
| HH1: Land north of Uppingham Road<br>(HOUGHTON ON THE HILL) |      |      |     |     |     |     | Assume<br>permisio<br>n granted |     | HDC START | 25  | 25  | 25    | 5   |     |     |     |       |     |     |     |     |       |        | 80  |
| HH2: Land north of Stretton Lane<br>(HOUGHTON ON THE HILL)  |      |      |     |     |     |     |                                 |     | 12        | 12  |     |       |     |     |     |     |       |     |     |     |     |       |        | 24  |
| HB1: Land east of Welford Road<br>(HUSBANDS<br>BOSWORTH)    |      |      |     |     |     |     | Applicatio<br>n (March<br>2026) |     | HDC START |     |     |       | 50  | 50  | 5   |     |       |     |     |     |     |       |        | 105 |
| U1: Land south of Ashby Road<br>(ULLESTHORPE)               |      |      |     |     |     |     |                                 |     | 15        | 15  |     |       |     |     |     |     |       |     |     |     |     |       |        | 30  |
| U2: Land north of Ashby Road<br>(ULLESTHORPE)               |      |      |     |     |     |     | Assume<br>applicatio<br>n       |     | HDC START |     |     | 25    | 25  |     |     |     |       |     |     |     |     |       |        | 50  |
| Small villages requirement                                  |      |      |     |     |     |     | 0                               | 0   | 0         | 0   | 0   | 0     | 0   | 0   | 0   | 0   | 0     | 0   | 0   | 0   | 0   | 0     | 0      | 0   |
| Total Allocations                                           | 0    | 0    | 0   | 0   | 0   | 0   | 0                               | 0   | 97        | 242 | 133 | 355   | 530 | 610 | 695 | 720 | 660   | 575 | 445 | 410 | 410 |       | 5,882  |     |
| Projected Annual Total                                      | 1010 | 1026 | 929 | 758 | 491 | 567 | 550                             | 509 | 497       | 617 | 222 | 586   | 761 | 832 | 859 | 870 | 810   | 725 | 595 | 560 | 560 |       | 14,334 |     |
| 5 Year Totals (following<br>adoption during 26/27)          |      |      |     |     |     |     |                                 |     |           |     |     | 2,431 |     |     |     |     | 4,132 |     |     |     |     | 2,440 |        |     |
| Annual Requirement                                          | 657  | 657  | 657 | 657 | 657 | 657 | 657                             | 657 | 657       | 657 | 657 | 657   | 657 | 657 | 657 | 657 | 534   | 534 | 534 | 534 | 534 |       | 13,182 |     |

\*Commitments figure includes 1,500 homes on Lutterworth East (see the Local Plan Housing Supply Tables).

| Scenario A                           |  |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |  |
|--------------------------------------|--|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|--|
| No adjustments for previous delivery |  |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |  |
|                                      |  | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | 2033/34 | 2034/35 | 2035/36 | 2036/37 | 2037/38 | 2038/39 | 2039/40 | 2040/41 |  |
| Requirement                          |  | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 657     | 534     | 534     | 534     | 534     | 534     |  |
| 5 year requirement (as of 01/04)     |  | 3285    | 3285    | 3285    | 3285    | 3285    | 3285    | 3285    | 3285    | 3285    | 3285    | 3285    | 3285    | 3162    | 3039    | 2916    | 2793    | 2670    | 2670    | 2670    | 2670    | 2670    |  |
| plus a 5% buffer                     |  | 3449    | 3449    | 3449    | 3449    | 3449    | 3449    | 3449    | 3449    | 3449    | 3449    | 3449    | 3449    | 3320    | 3191    | 3062    | 2933    | 2804    | 2804    | 2804    | 2804    | 2804    |  |
| Annualised requirement               |  | 690     | 690     | 690     | 690     | 690     | 690     | 690     | 690     | 690     | 690     | 690     | 690     | 664     | 638     | 612     | 587     | 561     | 561     | 561     | 561     | 561     |  |
| Annual supply                        |  | 1010    | 1026    | 929     | 758     | 491     | 567     | 550     | 509     | 497     | 617     | 222     | 586     | 761     | 832     | 859     | 870     | 810     | 725     | 595     | 560     | 560     |  |
| Forecast five-year supply            |  |         |         |         |         |         |         |         | 2431    | 2683    | 3018    | 3260    | 3908    | 4132    | 4096    | 3859    | 3560    | 3250    | 2440    | 1715    | 1120    | 560     |  |
| 5YHLS                                |  |         |         |         |         |         |         |         | 3.52    | 3.89    | 4.37    | 4.73    | 5.66    | 6.22    | 6.42    | 6.30    | 6.07    | 5.80    | 4.35    | 3.06    | 2.00    | 1.00    |  |

| Cumulative Supply vs Requirement |  |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |  |
|----------------------------------|--|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|--|
|                                  |  | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | 2033/34 | 2034/35 | 2035/36 | 2036/37 | 2037/38 | 2038/39 | 2039/40 | 2040/41 |  |
| Cumulative requirement           |  | 657     | 1314    | 1971    | 2628    | 3285    | 3942    | 4599    | 5256    | 5913    | 6570    | 7227    | 7884    | 8541    | 9198    | 9855    | 10512   | 11046   | 11580   | 12114   | 12648   | 13182   |  |
| Cumulative Supply                |  | 1010    | 2036    | 2965    | 3723    | 4214    | 4781    | 5331    | 5840    | 6337    | 6954    | 7176    | 7762    | 8523    | 9355    | 10214   | 11084   | 11894   | 12619   | 13214   | 13774   | 14334   |  |
| Difference                       |  | 353     | 722     | 994     | 1095    | 929     | 839     | 732     | 584     | 424     | 384     | -51     | -122    | -18     | 157     | 359     | 572     | 848     | 1039    | 1100    | 1126    | 1152    |  |

| Scenario B                                                                                   |  |         |         |         |         |
|----------------------------------------------------------------------------------------------|--|---------|---------|---------|---------|
| Liverpool adjustments for oversupply (presented until 2030/31, after which a deficit arises) |  |         |         |         |         |
|                                                                                              |  | 2027/28 | 2028/29 | 2029/30 | 2030/31 |
| Remaining plan period                                                                        |  | 14      | 13      | 12      | 11      |
| Oversupply                                                                                   |  | 584     | 424     | 384     | -51     |
| Oversupply at end of previous year (divided by years remaining)                              |  | 49      | 39      | 28      | 26      |
| Requirement                                                                                  |  | 657     | 657     | 657     | 657     |
| Revised annual requirement                                                                   |  | 608     | 618     | 629     | 631     |
| 5 year requirement (as of 01/04)                                                             |  | 3041    | 3090    | 3144    | 3157    |
| plus a 5% buffer                                                                             |  | 3193    | 3245    | 3301    | 3315    |
| Revised annual requirement                                                                   |  | 639     | 649     | 660     | 663     |
| Forecast five-year supply                                                                    |  | 2431    | 2683    | 3018    | 3260    |
| 5YHLS                                                                                        |  | 3.81    | 4.13    | 4.57    | 4.92    |

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