

Harborough Local Plan Examination. Hearing Statement.

Matter 3 – Amount and Distribution of Development.

On behalf of Vistry Group.

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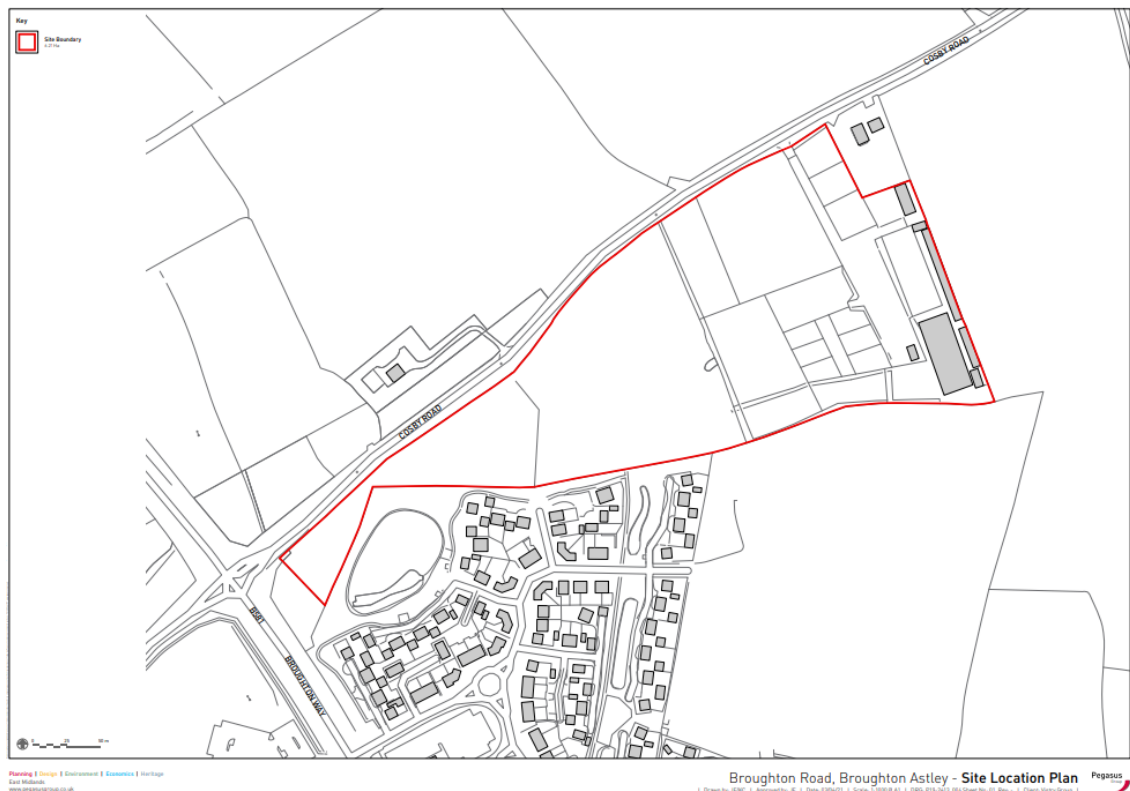
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Appendix A: Draft Melton South Sustainable Neighbourhood Masterplan

1. Introduction

- 1.1. This Hearing Statement has been prepared by Pegasus Group on behalf of Vistry Group to inform the Harborough Local Plan Examination in Public.
- 1.2. Vistry Group have an interest in the Land at Witham Villa, Broughton Road, Broughton Astley which provides an opportunity to deliver 138 homes. The site, shown below, is an allocation in the draft Broughton Astley Neighbourhood Plan, for a which a positive Examiners Report has recently been published but the site is not allocated in the draft Local Plan.



- 1.3. Our client's site was appraised in the Sustainability Appraisal supporting the Local Plan and given Site ID 21/8220: Land at Witham Villa, Broughton Road. The site extends to approximately 6.33 hectares and is north of the existing 'Estley Green' housing development. The site comprises of an existing paddock with associated stables and is in a central location.
- 1.4. The site is in single ownership and our client, Vistry Group, are one of the top five housebuilders in the UK by volume. The site will deliver 138 homes, extend the existing green corridor from the development to the south as well as additional provision of play area space. A Concept Masterplan for the site is included in Appendix A, demonstrating how the site how the development could be achieved.
- 1.5. Vistry Group has engaged throughout the preparation of the Harborough Local Plan. This includes submitting representations to the consultation undertaken under Regulation 19 in relation to the matters dealt with in this statement. The following hearing statement responds to the Matters, Issues and Questions published for the Examination.

2. Matter 3 – Amount and Distribution of Development

Whether the Amount and Distribution of Development is positively prepared, justified, effective and consistent with national policy?

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

Issue 1: Spatial Strategy

Q1. Does the Plan clearly articulate its spatial strategy?

- 2.1. Policy DS01 sets out the location of the allocations rather than providing a clear spatial strategy that can be understood beyond the development planned.
- 2.2. It does not articulate the role and function of the settlements in the different tiers of the hierarchy, the pattern of development that is sought or the scale or type of development that will be acceptable at in different settlements beyond the allocations made.
- 2.3. This is important in the context of the new NPPF and the presumption in favour of sustainable development.

Q2. 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?

- 2.4. The Sustainability Appraisal explains how the Council considered six broad distribution options in November 2023 which led to 3 further refined options for the level and distribution of housing. The reasons for rejecting or selecting different options are not clearly set out in the SA report, which is important in understanding whether this was an appropriate strategy taking account of the reasonable alternatives.

Q3. 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. No comments.

Issue 2: Delivering Homes

Policy DS01 Development Strategy: Delivering Homes

Q1. 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?

- 2.6. The identification of Broughton Astley as a Larger Village, one of the most sustainable settlements outside the urban area and Market Towns is an accurate reflection of the sustainability of the village which provides access to a range of services and facilities to meet residents day to day needs including Primary School, Community College, Aldi Store, Broughton Astley Leisure Centre, Pre-School, Recreation Ground, Village Hall, Veterinary, Church, Pub and employment sites such as Estley Green Business Park and Cottage Lane Industrial Estate.
- 2.7. The basis of the distribution of development between the tiers is unclear. The Sustainability Appraisal explains how the Council considered six broad distribution options in November 2023 which led to 3 further refined options for the level and distribution of housing. The reasons for rejecting or selecting different options are not clearly set out in the SA report.
- 2.8. The reason for selecting or rejecting certain site options relies on the fact that council has decided the level of development that should be accommodated in certain settlements. However, without a clear description of the process that led to the identification of levels of development in certain settlements, the site selection process is not clearly justified.

Q2. 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?

- 2.9. No comments.

Q3. Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?

- 2.10. No comments.

Q4. 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?

- 2.11. Harborough District falls fully within the Leicester and Leicestershire Housing Market Area and therefore the distribution of unmet needs from Leicester can be reasonably met anywhere within the Borough.
- 2.12. In this context and taking account of the scale of unmet need relative to the local housing need for Harborough, the plan focuses sufficient development in the Leicester urban area.

Issue 3: Housing Need and Requirement

Q.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-01120190220]

- 2.13. Supply prior to the calculation of Local Housing Need (LHN) that has informed the housing requirement, should not be taken into account.
- 2.14. This is however a supply side issue rather than a housing requirement one. The housing requirement reflects the LHN at 1st April 2022 plus provision for unmet needs from Leicester, the supply from before 1st April 2022 does not appear to have informed the housing requirement.
- 2.15. We make separate representations on the need to make provision Leicester's unmet need throughout the plan period, but in terms of the question, the supply before 1st April 2022 has not informed housing requirement.
- 2.16. This said, the current proposed approach of including supply from before the Local Housing Need calculation is flawed from a supply side perspective. As stated in the question, the standard methodology takes into account past delivery through the affordability adjustment and therefore including past over delivery to reduce the supply required throughout the remainder of the plan period could led to double counting.
- 2.17. The relevant version of the Planning Practice Guidance on this point states that (Paragraph: 011 Reference ID: 2a-011-20190220):

'The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.'
- 2.18. The guidance is clear that the affordability adjustment removes the need to consider delivery prior to the calculation of the Local Housing Need, this applies equally to over delivery as it does under delivery. It would therefore not be justified to take account of the supply from the two years prior to the calculation of housing need to reduce the supply needed through the plan period.

Q2. The Panel notes the Council's response to the Panel's PQ16 [HDC2]. If the Panel were to decide that the Plan's housing supply prior to the latest calculation of LHN should be discounted from its housing requirement, what is the implication for the Plan housing requirement?

- 2.19. This is not an issue with the annual housing requirement calculation, as set out in our answer to Q1 above, it is an issue with the period over which the housing requirement it is applied.
- 2.20. The supply prior to the latest calculation of LHN should not be discounted from the housing requirement as it was not factored into the housing requirement. The housing requirement is based solely on the LHN and provision for unmet need; no account was taken of over or under delivery.

- 2.21. The annual housing requirement should, however, be used over a period starting from when the LHN was calculated, currently 2022 not 2020. The first two years of the housing requirement and the first two years of supply should be removed.
- 2.22. On the assumption that the 2022 LHN is found to be the appropriate LHN calculation to have used, the annual housing requirement derived from this, plus provision for unmet needs, should be applied to a period which also starts in 2022.
- 2.23. The housing requirement is based on the calculation of the Local Housing Need at 1st April 2022 and therefore the Local Plan should be rebased to 2022. There is no justification for a plan period which start two years before the base date of the calculation that informed the housing requirement.
- 2.24. This will remove two years from the housing requirement and two years from the supply, any delivery before the rebased plan period should be removed from the housing trajectory and supply calculations.
- 2.25. We have made separate representations that the plan period should also be extended beyond 2041 to ensure there is a 15 year time horizon at adoption and that the housing requirement should include provision for Leicester's unmet over the full plan period. These issues will also need to be resolved before an appropriate housing requirement is established.

Q3. NPPF paragraph 63 sets out, in the context of establishing need, the size, type and tenure of housing needed for different groups in the community that should be assessed and reflected in planning policies. The non-exclusive list of those with specific housing needs includes those who require affordable housing, families with children, older people, students, people with disabilities service families, travellers, people who rent their homes and people wishing to commission or build their own homes. How has the Plan assessed and sought to meet the needs of those with specific housing needs as required by NPPF paragraph 63?

- 2.26. No comments.

Q4. NPPF paragraph 67 sets out that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Would the Plan be consistent with this national policy?

- 2.27. Whilst the Local Plan provides a housing requirement for Small Villages, this is not the case for Larger and Medium Villages, such as Broughton Astley. In the Larger and Medium Villages the Local Plan includes specific allocations without reference to a housing requirement for these designated neighbourhood areas or how this should be calculated.

Issue 4: Leicester's Unmet Need

Q1. 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. There is a clear and robust justification for an allowance to be made for Leicester's unmet need of 123 homes a year, which has been agreed between the authorities and tested through the subsequent Examinations of the Leicester City and Charnwood Local Plans.
- 2.29. The Leicester & Leicestershire Authorities – Statement of Common Ground relating to Housing and Employment Land Needs (June 2022) sets out the agreed position between the authorities on the scale of Leicester's unmet need and the distribution of this to the neighbouring authorities.
- 2.30. The unmet need figure is identified in the Statement of Common Ground as 18,700 homes over the City's Local Plan period of 2020–2036, which is 1,169 homes a year. This has since been confirmed through the adoption of the Leicester City Local Plan in June 2026 with the final figure being 18,694 homes.
- 2.31. The Leicester and Leicestershire Housing & Economic Needs Assessment Housing Distribution Paper 2022 set out an agreed methodology for apportioning Leicester City's unmet housing need having regard to a range of factors including the functional relationship of each District/Borough with Leicester City, the balance of jobs and homes in each district/borough, and deliverability of the distribution of development.
- Q2. 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. The Local Plan's housing requirement must include provision for unmet needs from Leicester beyond 2036 in order for the Local Plan to be positively prepared. To stop providing for unmet needs arbitrarily in 2036 is not justified by the evidence.
- 2.33. The evidence of continuing unmet need is provided in the Leicester & Leicestershire Authorities – Statement of Common Ground relating to Housing Distribution following NPPF and new Standard Method published December 2024 (December 2025).
- 2.34. Whilst this was prepared to respond to the 2024 NPPF changes to the standard methodology which this Local Plan is not addressing, it provides important evidence about on-going unmet need beyond 2036, despite a significant decrease in housing need within the City following the changes to the standard method.
- 2.35. The authorities commission Housing and Economic Needs Assessment – Updated Housing Distribution Paper (2025) which provides an estimate a potential future capacity within the City for the period 2036–2046 based on a review of known and anticipated delivery, excluded areas of significant constraints, and projected future delivery rates. This is in the context of a newly adopted Local Plan where the evidence of constraints and delivery rates have been very recently tested. This indicates that for the period 2036 – 2046 Leicester City has an estimated unmet need of 8,230 dwellings.
- 2.36. It is important to recognise that this unmet need figure is in the context of the overall housing need in the Housing Market Area having increased from 5,713 homes a year in 2022 to 5,892 homes a year in 2024 under the new methodology. The decrease in the City need was matched with increases in most of the other Housing Market Area authorities, including Harborough District.

- 2.37. Whilst the 2024 NPPF standard methodology results are not relevant to setting the housing requirement for the Harborough Local Plan, which is being tested against the NPPF 2023, the conclusion that there will continue to be unmet needs arising from Leicester beyond 2036 is relevant and provides robust evidence the unmet need provision should not arbitrarily stop in 2036.
- 2.38. This evidence confirms what was already known from the evidence, available ahead of the Pre-Submission Local Plan consultation, for the Leicester City Local Plan Examination. In October 2024 the City Council were asked by their Local Plan Inspectors about the implications of the changes to the proposed standard method figures for the City. The Council's note (Exam 56, Action 17 Note) states the following:
- 'As the Leicester Local Plan at Examination effectively allocates the final remaining strategic site development opportunities for development ahead of 2036, the city capacity going forward into Plan review will be limited. As anticipated in the Strategic Growth Plan, there will be an increasing unmet need requirement going forwards in City – at the time of SGP approval, the potential City supply figure envisaged beyond 2031 was 550 dpa.*
- The City Council therefore expects that under the new NPPF, in addition to the new standard method need, partner councils will also need to address evidenced future City unmet need in their Local Plans beyond that identified to 2036 in the 2022 Statement of Common Ground. City capacity will only be able to be fully confirmed and evidenced post adoption of the Plan currently being examined'.*
- 2.39. It has been readily apparent that unmet need from Leicester City will continue beyond 2036. The City has tightly drawn administrative boundaries which means there can only be a decrease in capacity for housing development after 2036 with the Council having maximised its options through their current Local Plan to 2036.
- 2.40. The argument is made in the Housing Topic Paper April 2026 (TPC-NLP 7) at paragraph 4.13 that under the NPPF 2024 the city's unmet need is substantially lower than the NPPF 2023 and therefore the proposed Harborough Local Plan provides for a greater amount of unmet need during the plan period than it would need to under the NPPF 2024 and the Updated Housing Distribution Paper and associated Statement of Common Ground.
- 2.41. Whilst the updated Statement (December 2025) does apportion a smaller number of homes from Leicester to Harborough District (62 homes a year), this can not be considered in isolation of the fact this is on the basis that Harborough is meeting a significantly higher proportion of the overall housing need of the Housing Market Area before the apportionment. It is based on the 2024 standard method figure of 735 for Harborough's Local Housing Need. This means the housing requirement for Harborough is proposed to be 797 homes a year from 2024 based on the updated housing figures.
- 2.42. The only reasonable and responsible course of action is for unmet need, agreed in the the context of the 2023 NPPF figures, to continue to be incorporated into the housing requirement for the District after 2036 and until such time that the plan is updated to fully reflect the new housing need data.

Issue 5 Housing Supply

Q1. 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: 68-02120190722]

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

- 2.43. The stepped trajectory is not justified, it is simply the product of the Council only making provision for Leicester's unmet needs up to 2036. This means the housing requirement drops after 2036 to the Local Housing Need figure.
- 2.44. As set out above we have significant concerns about the principle of this approach to unmet need, but notwithstanding this, that still does not provide the basis of a justification for stepped trajectory.
- 2.45. This is not what is envisaged by the PPG, there are no specific circumstances within the area that justifies this approach such as a significant change in the level of housing required or a reliance on strategic sites that mean delivery will be phased towards the end of the plan period.
- 2.46. The Housing Topic Paper, April 2026 (TPC-NLP 7) sets out at paragraph 3.11-3.13:

'The stepped housing requirement is considered to be justified. The L&L SoCG (2022) SCG-NLP3 apportions an additional 123 homes per year between 2020 and 2036 to Harborough District (i.e. 1,968 homes in total) to help meet Leicester's unmet need... It is not considered appropriate to accommodate unmet need beyond 2036 in the absence of a full and comprehensive assessment of capacity over this timescale.'
- 2.47. In any event, there is clear evidence that Leicester City will continue to have unmet need beyond 2036, most recently in the Leicester and Leicestershire Statement of Common Ground (December 2025). A stepped trajectory is therefore not justified by any specific circumstances or by the evidence related to unmet needs.

Q2. 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?

- 2.48. This needs to be explored in light of the need to rebase the Local Plan to 2022 as a minimum, extend the plan period to provide a 15 time horizon at adoption and make provision for unmet needs beyond 2036.
- 2.49. The current contingency of 2,142 homes identified in the Housing Topic Paper, April 2026 (TPC-NLP 7) Table 6.1 would be reduced to 1,420 by rebasing the plan to 2022 and removing the completions 2020-22 and reducing the housing requirement by two years.

- 2.50. Ensuring unmet needs are provided for beyond 2036 would increase the housing requirement by 615 homes (123 unmet needs x 5 years for 2037–2041) and this would further decrease the contingency to 805 homes over the plan period.
- 2.51. If the housing requirement made provision for unmet needs throughout the plan period and the plan period was rebased to 2022, the overall housing requirement would be 12,483 homes (2022–41), this is 657 x 19 years. A contingency of 805 homes would be 6% contingency, which is insufficient in the context of the plan relying on large strategic sites, a small village requirement from unallocated sites as well as windfalls as part of the supply.
- 2.52. It is our view that the supply of sites identified will not be sufficient to meet the full housing requirement over the plan period if the housing requirement addresses housing needs appropriately.

Q3. 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?

- 2.53. The Local Plan proposes that the housing requirement will be met through allocations, a small village requirement, windfall allowance of 45 dpa (2031–41) and existing completions and commitments.
- 2.54. The housing requirement, as proposed is based on the standard method figure calculated in 2022 plus provision for unmet needs from Leicester. In this context there is no justification for the plan period starting in 2020 and the completions from the two years prior to the calculation being taken into account.
- 2.55. Both the housing requirement and completions data should be rebased to 2022, as a minimum, to reflect the use of the 2022 Local Housing Need to inform the housing requirement. The Local Housing Need is calculated using an affordability adjustment which takes account of past delivery.
- 2.56. The Housing Topic Paper, April 2026 (TPC–NLP 7) shows that inclusion of completions for 2020–2022 is over inflating the supply figures as completions were over 1,000 for both years, this is the equivalent of three years worth of delivery in two years. Completions 2022–2025 averaged 726 and so excluding these two years of completions and rebasing the housing requirement reduces the contingency by 722 homes from 2,142 over the plan period to 1,420 homes and provides a better indication of the true contingency available (11% rather than 16%).
- 2.57. Supply from 2020–22 should not be taken into account and plan should be rebased to 2022 as a minimum.

Q4. Would the Plan promote the development of a good mix of sites, including small and medium sized sites in accordance with NPPF paragraph 70? Would the Plan provide land to accommodate at least 10% of the housing requirement on sites no larger than one hectare?

- 2.58. No comments.

Q5. 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?

2.59. The Housing Topic Paper, April 2026 (TPC-NLP 7) does not provide any evidence of historic windfalls or an assessment of how the small village requirement interacts with the previous rate. It is not possible, therefore to comment on whether this meets the test of providing compelling evidence that this will be a reliable source of supply.

2.60. This is particularly important to understand in the context of the true contingency identified above once the supply from before 2022 is removed and unmet needs are factored in beyond 2036.

Q6. 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?

2.61. The Housing Topic Paper, April 2026 (TPC-NLP 7) does not provide any evidence to justify the small village requirement, it is therefore not possible to comment on whether this is based on robust evidence or whether this will be a reliable source of supply.

2.62. This is particularly important to understand in the context of the true contingency identified above once the supply from before 2022 is removed and unmet needs are factored in beyond 2036.

Q7. The Plan references prescriptive housing figures for individual villages, such as 23 units in Leire, and 49 units at Dunton Bassett. Are these figures envisaged to be treated as a cap on development? Is such an approach consistent with the objective of NPPF paragraph 60, to significantly boost the supply of homes?

2.63. No comments.

Q8. How have allocations in Made Neighbourhood Plans been taken into account in deriving the Plan's housing requirement?

2.64. Allocations in made Neighbourhood Plans are stated as being taken into account as part of the pipeline of commitments in paragraph 4.8 of the Local Plan.

2.65. The reliance on these sites suggests that they should shown on the policies map as sites within the limits to development. They could also be included in the list of allocations in the Local Plan if the site is not under construction or built, to ensure there is transparency in where development will be located in order to meet the District's housing needs.

2.66. Our client's site is a draft allocation in the emerging Broughton Astley Neighbourhood Plan which is due to go to referendum on 26th November 2026. The Local Plan does not take into account this site due to the timing of the two plans progressing in parallel.

- 2.67. The site at Witham Villa, Broughton Astley is allocated for 138 dwellings in Policy 1: Residential Site Allocation of the emerging Broughton Astley Neighbourhood Plan. The plan has been examined and decision notice is due to be published shortly allowing the referendum to take place on 26th November.
- 2.68. The site is not currently counted as a commitment or an allocation in the Local Plan but it should be taken into account as it will assist the Council with meeting its housing needs. The Main Modifications should include updating the Local Plan to include the Witham Villa allocation for 138 homes in the Broughton Astley Neighbourhood Plan to reflect the progress made since the Local Plan Pre-Submission Version was published.

Q9. Would the Plan deliver an appropriate balance between size of site, given the longer lead in times associated with larger sites? Would the Plan's reliance on large strategic sites, including East of Lutterworth Strategic Development Area (SDA), put delivery at undue risk? And if so, how would this be mitigated?

- 2.69. The supply of homes includes a mixture of sizes of sites, which is supported. This will help ensure that the slower delivery of more strategic sites is balanced with the delivery of non-strategic sites.
- 2.70. The key mitigation for a reliance on large strategic sites is the inclusion of an appropriate level of contingency in the housing supply.
- 2.71. The inclusion of our client's site, which is allocated in the emerging Broughton Astley Neighbourhood Plan but not taken into account in the Local Plan, would further increase the balance of non-strategic sites to strategic sites and also increase the level of contingency by adding to the housing supply.

Issue 6: Five Year Supply

Q1. 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?

- 2.72. The inclusion of the small villages requirement and windfall allowance is not justified in the context of demonstrating a supply of specific, deliverable sites for five years from adoption. These sites by their nature are not specified as they are currently unknown, and therefore can not be relied upon for five year supply calculations.

Q2. The Council includes 222 homes for minor sites (fewer than 10 dwellings) contributing to the 5-year supply from 1st April 2028. What is the robust evidence to justify this approach?

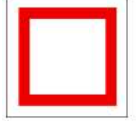
- 2.73. The Council states in Appendix 2 of HDC2 that these sites have planning permission. If this is the case their inclusion in the supply is reasonable.



Appendix A: Concept Masterplan



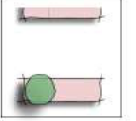
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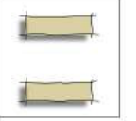
Site Boundary
4.21ha



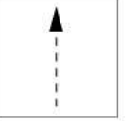
Development Area
220m² - up to 120 dwellings
350m² - up to 130 dwellings



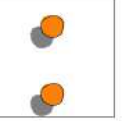
Primary Street



Lane



Shared Private Drive



Public Right of Way
Footpath WS3/1



Pedestrian / Cycle Path



Off Site Strategic Pedestrian Route



Site Access



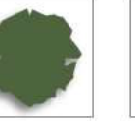
Potential Pedestrian Connection



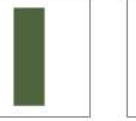
Drainage Basin



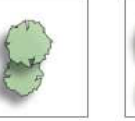
Play Space (LEAP)



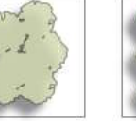
Existing Tree



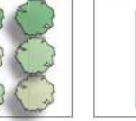
Existing Hedge



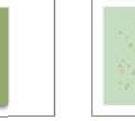
Illustrative Tree Planting



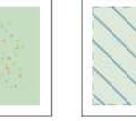
Illustrative Buffer Planting



Community Orchard



Illustrative Hedgerow Planting



Illustrative Wildflower Meadows



Flood Zone



Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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