

Written Statement

On behalf of Davidsons Developments Limited and Jelson
Homes

Harborough Local Plan to 2041 - Examination

Matter 3 – Amount and Distribution of Development
Issues 1 & 2: Spatial Strategy / Delivering New Homes
October 2026



Control Sheet

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	Name	Position	Initials	Date
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1. ISSUE 1 – SPATIAL STRATEGY

Q1. Does the plan clearly articulate its spatial strategy?

- 1.1. The Plan does articulate its spatial strategy in general terms. However, the reader is required to look at various parts of the supporting text in order to fully understand it.
- 1.2. Paragraph 3.7 of the Plan explains its overall strategy is to focus growth upon the most sustainable parts of the District and to maximise opportunities to deliver growth in the areas close to Leicester and the Market Towns through a combination of strategic developments areas and clusters of sites. Paragraph 4.13 further explains that the decision to focus residential development predominantly upon the Leicester Urban Area and Market Harborough is a reflection of the higher levels of existing or potential accessibility to public transport. Whilst we do not disagree with those broad statements in terms of either the Plan's content or their broad intent, they do not explain the role and function of the Large Villages, which are also to play a significant role in the spatial strategy.
- 1.3. Policy DS01 explains how the overall approach articulated within the supporting text will be implemented in practice and the apportionment of the housing growth across the relevant tiers of the settlement hierarchy. These identify a clear numerical role for each tier of the settlement hierarchy in delivering the overall spatial strategy in terms of the overall amount of housing growth each tier is expected to generate.
- 1.4. However, we consider that Policy DS01 should set out, within the policy text, a broad position statement in respect of where the Plan anticipates growth occurring and the qualitative role and function of each tier of settlement hierarchy in accommodating the overall growth strategy, particularly in respect of the Large Villages. This will ensure that the Plan's spatial strategy is clear for decision-takers, communities and stakeholders.

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?

- 1.5. Our response below addresses whether the overall distribution of housing proposed within the Plan represents an appropriate strategy in relation to Policy DS01.
- 1.6. It is evident that the District's settlement hierarchy has played a central role in informing the spatial distribution of growth and the alternative options tested through the Sustainability Appraisal. As set out in the Development Strategy Topic Paper (PRE-NLP 4), the settlement hierarchy formed the starting point for the consideration of growth options, which we consider to be appropriate given the NPPF's statement at paragraph 109 that significant development should be focused on locations which are or can be made sustainable.
- 1.7. Following the appraisal of a range of strategic alternatives, the Council's preferred approach evolved into a hybrid strategy focused on the Leicester Urban Area and Market Harborough, supported by additional growth at the District's more sustainable villages, namely the Large Villages.
- 1.8. This approach emerged from the appraisal of six initial strategic and high-level options, elements of four of which were subsequently carried forward into the refinement process.

Option 1, which broadly reflected the existing development strategy, and Option 2, which promoted proportionate growth across the settlement hierarchy, were not ultimately preferred. Both would have directed a greater proportion of development towards the District's villages relative to the Leicester Urban Area and the Market Towns than the Council considered appropriate. The outcome of this assessment was a refined set of options centred on strategic-scale growth around the Leicester Urban Area and Market Towns, whilst retaining an important role for the Large Villages.

- 1.9. In our view, that is entirely appropriate. The Market Towns and the Leicester Urban Area are clearly the most sustainable locations within the District. Strategic development, whilst needing to be deliverable and properly managed, also has the ability to deliver considerable sustainability benefits. The Large Villages already accommodate a significant proportion of the District's population and housing stock and generally benefit from a reasonable range of services, facilities and community infrastructure. They are therefore sustainable locations for growth and have an important strategic role to play in meeting housing needs across the District, consistent with their position within the settlement hierarchy.
- 1.10. The Sustainability Appraisal ultimately identified a hybrid approach between the Leicester Urban Area and the Market Towns as the preferred strategy. Refined Option 1 was discounted due to concerns regarding deliverability and the concentration of a substantial proportion of growth within a limited number of locations. Similar concerns arose in relation to Refined Option 2. The preferred hybrid option was considered to provide a more balanced distribution of development across the District's most sustainable locations (i.e. the Market Towns and the Leicester Urban Area), whilst also representing the most deliverable strategy over the plan period, and retaining the ability to deliver growth at scale. The deliverability of this option is further bolstered through the levels of growth directed toward the Large Villages, which provide further balance to the overall strategy.
- 1.11. The proposed distribution of housing in Policy DS01 broadly reflects this preferred approach which has emerged through the Plan's evidence base. Approximately 38% of net allocated growth is directed to the Leicester Urban Area, 26% to the Market Towns and 23% to the Large Villages, with the balance distributed between Medium Villages and Small Villages. Whilst the Leicester Urban Area and Market Towns form the principal focus for growth, the substantial proportion directed to the Large Villages is noteworthy and reflects their importance within the overall strategy. This assists in maintaining flexibility and resilience in housing delivery, provides a wider range of development opportunities and supports the availability of deliverable sites throughout the early years of the Plan period.
- 1.12. The Leicester Urban Area has a particularly strong spatial and functional relationship with Harborough District and includes settlements such as Scraptoft, Thurnby and Bushby. Directing substantial growth to this location not only provides access to existing services, facilities, employment opportunities and transport infrastructure, but also assists in accommodating unmet needs arising from Leicester in locations closely related to the City. Given the well-established functional relationship between Harborough District and Leicester, this represents a logical and sustainable component of the overall development strategy.

- 1.13. Overall, we consider the Plan's spatial strategy in terms of the overall distribution of growth to be appropriate taking account of the reasonable alternatives considered and to be based upon clear evidence.

Q3. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

- 1.14. The Council's consideration of reasonable alternatives appears to have been proportionate and robust having regard to the spatial characteristics of the District, the distribution of services and facilities, and the established settlement hierarchy.
- 1.15. The process did not simply compare a fixed set of competing strategies before selecting a preferred option. Rather, it began with a series of broad spatial approaches which were subsequently tested, refined and combined through an iterative process informed by the Sustainability Appraisal and supporting evidence base.
- 1.16. In our view, this approach appropriately explored the realistic alternatives available to the Council. The preferred spatial strategy does not reflect any single option in isolation but instead incorporates elements of a number of alternative approaches, balancing growth between the Leicester Urban Area, the Market Towns and the District's most sustainable rural settlements. As such, the Plan's distribution strategy represents the evolution of the option appraisal process rather than a simple choice between discrete alternatives.
- 1.17. Whilst other distributions of development could theoretically have been pursued, we are satisfied that the Council identified and assessed the principal realistic alternatives and that the eventual strategy has emerged through a reasoned process of refinement. The result is a spatial strategy which seeks to maximise sustainable patterns of development, reflects the differing roles and functions of settlements across the hierarchy, and provides a deliverable framework for accommodating the District's housing needs.

2. ISSUE 2 - DELIVERING HOMES

Q.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?

- 2.1. The Settlement Hierarchy Assessment uses a combination of quantitative and qualitative analysis to establish the District's settlement hierarchy. The quantitative assessment considers settlement size, using Census 2021 population and household data, alongside an audit of services and facilities. The latter is divided into three categories comprising "higher order", "important" and "supporting" services and facilities, with differential weightings applied to each category. This is then supplemented by a qualitative "sense check" assessment considering matters such as settlement function, public transport accessibility, employment opportunities, development capacity and constraints. This represents a robust and proportionate methodology and provides a reasonable basis upon which to assess the relative sustainability of settlements.
- 2.2. Whilst we generally support the methodology, we are less persuaded by the weighting attributed to "higher order" services and facilities. The Assessment justifies this on the basis that such facilities serve wider catchments and therefore tend to be located in the District's largest settlements. However, in our view, the sustainability value of a service is not solely determined by the breadth of its catchment but also by the frequency with which residents are likely to use it. On that basis, facilities such as GP surgeries, convenience shopping and primary schools are arguably of greater significance in influencing day-to-day travel patterns than facilities such as community hospitals, leisure centres or public swimming pools. We therefore question whether the weighting given to higher order services provides the most accurate reflection of settlement sustainability.
- 2.3. We nevertheless recognise that the assessment does not rely solely on service scores. In particular, Scraptoft and Thurnby/Bushby are identified as forming part of the Leicester Urban Area and are elevated within the hierarchy notwithstanding their audit scores because of their proximity to, and functional relationship with, Leicester. The Assessment expressly recognises that these settlements benefit from access to a much wider range of employment opportunities, higher order services, facilities and sustainable transport options than is reflected in the audit score alone. We consider that approach to have resulted in an evidence-based settlement hierarchy, which provides a robust basis for the Plan's spatial strategy.

Q.2 Is the proposed distribution of housing supported by evidence in the Strategic Housing and Economic Land Availability Assessment (SHELAA), settlement hierarchy and SA, and will it lead to an appropriate pattern of housing growth?

- 2.4. The SHELAA supports the proposed distribution of development in that it demonstrates a substantial supply of potentially suitable sites within the Leicester Urban Area, Market Towns and Large Villages, which are the very locations where the Plan apportions most growth.

- 2.5. Whilst the SHELAA is not determinative in where growth should be directed, it provides evidence that the settlement tiers identified within the Plan are capable of accommodating the level of development apportioned to them, and that the Plan's spatial strategy is based on a realistic understanding of development capacity.
- 2.6. In terms of the settlement hierarchy, we consider the proposed distribution of housing to be appropriately evidence-led. It strikes a reasonable balance between directing significant growth towards locations which are, or can be made, sustainable in accordance with national policy, whilst also ensuring a sufficient spread and diversity of sites to support delivery across the plan period. In our view, it is entirely appropriate that the spatial strategy follows the settlement hierarchy, as this promotes growth in locations with the greatest access to services, facilities, employment opportunities and sustainable transport options, thereby supporting sustainable patterns of development, in line with the expectations of the NPPF.
- 2.7. The proposed distribution will result in an appropriate pattern of housing growth. There is a clear correlation between a settlement's position within the hierarchy and the level of growth directed towards it, with the greatest proportion of development focused on the Leicester Urban Area, followed by the Market Towns and then the Large Villages. This reflects the relative sustainability of those locations whilst also ensuring that housing delivery is not overly reliant on a small number of strategic sites. The result is a balanced strategy which aligns growth with the District's most sustainable settlements and provides flexibility and resilience in housing delivery over the plan period.

Q.3 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?

- 2.8. The spatial strategy's focus has appropriately been on achieving sustainable patterns of development, namely directing growth towards locations which make best use of existing and planned services, facilities, employment opportunities and infrastructure, rather than prioritising sites solely on the basis of whether they are previously developed or greenfield.
- 2.9. As a predominantly rural district, however, Harborough has a limited supply of previously developed land capable of accommodating development at the scale required over the plan period. This is illustrated by the Harborough Brownfield Land Register, which identifies capacity for only 478 dwellings. Many of those sites are either completed, substantially built out or otherwise likely to form part of the existing supply position. In those circumstances, it is neither realistic nor necessary for the Plan to pursue a predominantly brownfield-led strategy.

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?

- 2.10. The Plan does not identify a separate housing requirement or housing trajectory specifically associated with Leicester's unmet housing needs. The agreed contribution towards Leicester's unmet need has been incorporated into the District's overall housing

requirement and is planned for through the Plan's wider spatial strategy. Therefore, the influence of Leicester's unmet need on the spatial strategy is indirect, being reflected through the overall scale of growth. We consider this to be appropriate given the content of Paragraph 67 of the NPPF, which says:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”
(emphasis added)

- 2.11. However, as indicated above, the Plan includes a significant proportion of its intended allocations at the Leicester Urban Area. This reflects its position as the most sustainable location in the District, but would also meet unmet need from Leicester close to where it arises, delivering significant benefits.
- 2.12. In terms of the balance between the Market Towns and the Leicester Urban Area, we consider the proposed pattern of development to be appropriate. The Sustainability Appraisal concluded that the preferred hybrid strategy, which combines growth at the Leicester Urban Area and Market Harborough, performs better overall than the reasonable alternatives considered. In particular, it was found to provide a more even distribution of growth across the District's largest and most sustainable settlements, whilst avoiding an excessive reliance on any single location. This balanced approach captures the sustainability benefits associated with the Leicester Urban Area, including access to employment, services and public transport, as well as meeting unmet need close to where it arises, whilst also maximising the role of Market Harborough as the District's principal Market Town.
- 2.13. We recognise why the Council has directed a greater proportion of growth towards Market Harborough than Lutterworth. The Settlement Hierarchy Assessment identifies Market Harborough as the highest-scoring settlement in the District, achieving a score of 66 points compared with 40 points for Lutterworth. This reflects Market Harborough's larger population, wider range of services and facilities, stronger employment function and superior public transport connectivity, including rail accessibility.
- 2.14. Lutterworth also performs strongly within the hierarchy and is appropriately identified as a Market Town, but its score is closer to that of the District's Large Villages, than it is to Market Harborough. In that context, we can understand why the Council has identified Market Harborough as the principal focus for growth within the Market Town tier and why a greater proportion of development has been directed to this location.

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Matter 3 – Amount and Distribution of Development
Issues 3, 4 and 5: Housing Need, Requirement and Supply
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1. ISSUE 3 – HOUSING NEED AND REQUIREMENT

Q1. 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

- 1.1. No, the housing supply prior to the latest calculation of the local housing need figure should not be taken into account. This approach is consistent with the findings of Inspectors in other, recent examinations, such as in the cases of the Amber Valley Borough Local Plan (2022 to 2040) and the Winchester District Local Plan (2020 to 2040).

Q2. 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?

- 1.2. This is a question for the local planning authority to answer, and we reserve our right to comment further in the hearing session.
- 1.3. On the basis that the Council states it undertook the latest LHN calculation in June 2022, this means that completions in the 2020/21, 2021/22 and at least part of the 2022/2023 monitoring years should not be taken account of. Appendix 5 of the Plan showing the housing trajectory reports a surplus in these years against the annualised housing requirement of 657 dwellings per annum as follows:

Monitoring Year	Requirement	Completions	Surplus
2020/21	657	1,010	+353
2021/22	657	1,026	+369
2022/23	657	929	+272
Total	1,971	2,965	+994

- 1.4. If both the requirement and the supply for these years were discounted, the Plan's supply would amount to 11,871 dwellings between 2023/24 and 2040/41 compared to a requirement of 11,211 dwellings. As such, it is apparent that the Plan would still have sufficient supply to meet its requirement, albeit with reduced headroom.

2. ISSUE 4 - LEICESTER CITY'S UNMET NEED

Q.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?

- 2.1. It is well established the Leicester City Council is a predominantly urban authority with a tightly drawn administrative boundary and so, it cannot accommodate its own development needs. Harborough District Council is part of the Leicester and Leicestershire Housing Market Area and therefore, it is fully appropriate for the Plan to address a portion of Leicester's unmet need.
- 2.2. Paragraph 11(b) of the National Planning Policy Framework requires strategic policies, as a minimum, to provide for objectively assessed development needs, including needs that cannot be met within neighbouring areas unless the application of policies within the Framework provides a strong reason for restricting development or the adverse impacts would significantly and demonstrably outweigh the benefits.
- 2.3. Paragraph 67 of the NPPF requires strategic policy-making authorities to establish a housing requirement which demonstrates the extent to which identified housing needs, including any needs arising from neighbouring authorities, can be met over the plan period.
- 2.4. The Planning Practice Guidance also recognises that there may be circumstances where it is appropriate to plan for a level of housing provision above that generated by the Standard Method, including where an authority has agreed to accommodate unmet housing needs arising elsewhere.
- 2.5. In terms of the scale of Harborough's contribution to Leicester City's unmet need, we consider the evidence base to provide a robust justification for the 123 dwellings per annum figure to 2036. The approach set out within the Housing Distribution Paper of June 2022 (HSG-NLP 3) is informed by a range of relevant considerations, including the functional relationship between Harborough District and Leicester City, patterns of commuting and migration, as well as alignment between homes and jobs. The evidence demonstrates a clear and established relationship between the two areas and provides a clear basis for Harborough District accommodating a proportion of Leicester's unmet need over the relevant period.

Q.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?

- 2.6. Yes, to ensure the Plan is positively prepared, its housing requirement should make provision for Leicester City's unmet need beyond 2036 across the entire Plan period to 2041.
- 2.7. Leicester City's unmet need beyond 2036 has been quantified in the Updated Housing Distribution Paper (Final Report) by Iceni dated November 2026 (HSG-NLP 11). This identifies the scale of unmet need arising from Leicester City to 2046 based upon the 2024 Standard Method (resulting in an unmet need figure of 8,390 from 2036 to 2046) and

estimates the City's urban capacity over that same period. Subsequently, it then constructs a functional relationship score for each authority using migration flows and commuting flows establishing an overall functional relationship "score" for Harborough. The unmet need is then re-distributed proportionately to the HMA authorities, including Harborough District, resulting in a need for Harborough of 1,138 dwellings or 114 dwellings per annum.

- 2.8. The underlying methodology deployed within the Updated Housing Distribution Paper is, at its core, materially the same as that which underpinned the earlier iteration of the work upon which the Plan relies in identifying and apportioning Leicester's unmet housing needs to 2036.
- 2.9. Whilst the two exercises utilise different versions of the Standard Method to establish the overall scale of Leicester's unmet need, the methodology used to distribute that need between authorities remains essentially unchanged. In both cases, the apportionment is driven principally by an assessment of functional relationships, informed by commuting and migration patterns between Leicester City and the surrounding authorities.
- 2.10. The updated Standard Method affects the quantum of unmet need arising from Leicester, but it does not materially alter the evidence regarding the strength of the functional relationship between Harborough District and Leicester City. As a consequence, the Updated Housing Distribution Paper provides a useful and relevant indication of the level of contribution that Harborough could reasonably be expected to make towards Leicester's unmet housing needs beyond 2036, notwithstanding that the Local Plan itself is being progressed under the transitional arrangements and therefore relies upon an earlier version of the Standard Method.
- 2.11. In respect of Leicester City Council's capacity, we do not agree there is an absence of robust evidence on this point. The Updated Housing Distribution Paper between paragraphs 4.8 and 4.39 documents an extensive process to establish Leicester's urban capacity from 2036 to 2046 and establishes a clear range of figures upon which wider unmet need across the HMA has been derived. As mentioned above, this evidence has been used to inform other emerging local plans in the area.
- 2.12. Even if there was a lack of evidence on Leicester City's unmet need beyond 2036, this would not absolve the HMA authorities of the requirement to quantify and meet those needs across the relevant timeframes as part of demonstrating effective cooperation and bringing forward positively prepared local plans.
- 2.13. We note the Council's position in the Housing Numbers Topic Paper April 2026 (TPC-NLP 7). This argues that because the 2024 Standard Method removes Leicester City's urban uplift, the proportion of Leicester's unmet need being accommodated within Harborough through the submitted Plan (which is calculated by reference to the 2023 Standard Method including the urban uplift) is greater than would be required.
- 2.14. The Council's conclusion is that the Plan therefore provides a greater contribution towards unmet need than would arise from applying the 2024 Standard Method and the assumptions contained within the Updated Housing Distribution Paper.
- 2.15. We do not agree with that conclusion. Whilst the removal of the urban uplift may reduce Leicester City's overall housing need, the application of the 2024 Standard Method results

in a higher local housing need figure for Harborough itself. The relevant question is therefore not simply whether Leicester's unmet need has reduced, but how the combined requirement for Harborough and its contribution towards unmet need compares with the requirement underpinning the submitted Plan.

- 2.16. In this regard, the Housing Distribution Paper demonstrates that, under the updated methodology, Harborough's own housing need together with its apportioned contribution towards Leicester's unmet need equates to 847 dwellings per annum. This exceeds the annualised requirement which underpins the adopted distribution of growth to 2036. Consequently, it is not clear that the Plan is providing a greater level of provision than would be required under the updated methodology when the increase in Harborough's own housing need under the Standard Method 2024 is properly taken into account.
- 2.17. It is also important to recognise that the HMA-wide housing distribution evidence draws a clear distinction between the period to 2036 and the period beyond 2036 when considering the distribution of Leicester's unmet need. Given that the Plan already incorporates a stepped housing requirement reflecting that distinction, there appears to be no obvious policy or methodological reason why a proportion of Leicester's unmet need could not be accommodated from 2036 to 2041.
- 2.18. We are also mindful of the Council's assertion within the housing evidence that the Plan provides approximately 16% headroom above its housing requirement. However, once both the requirement and supply are rebased to reflect the point at which the latest local housing need calculation was undertaken, the extent of that surplus appears materially lower than suggested as set out in our response to Matter 3, Issue 3 above. The degree of flexibility available within the housing land supply should therefore be treated with some caution.
- 2.19. Finally, whilst an early review remains a potential mechanism for addressing any shortfall, national policy is clear that unmet housing needs should, wherever possible, be planned for and addressed through the plan currently under examination rather than deferred to a future review process. Accordingly, we do not consider that the prospect of a future review provides a justification for postponing consideration of Leicester's remaining unmet housing needs where there is a reasonable opportunity to address them through the Plan.

3. ISSUE 5 - HOUSING SUPPLY

Q1. The Plan includes a stepped housing requirement. What is the robust justification specific to this Plan's circumstances to justify the approach taken?

- 3.1. On its face, the Council identifies a sufficient supply of housing land to meet its housing requirement over the Plan period. The Plan indicates a supply of 14,839 dwellings against a gross housing requirement of 13,182 dwellings, resulting in a surplus of 1,657 dwellings or 12.6%.
- 3.2. However, if the housing requirement and supply position are recalibrated to address delivery occurring prior to the most recent calculation of Local Housing Need, the position becomes tighter. On that basis, the Plan requirement would be 11,211 dwellings against a supply of 11,871 dwellings. Whilst this would still demonstrate sufficient supply to meet the requirement, the degree of flexibility within the housing land supply would be substantially reduced.
- 3.3. The housing requirement should properly be regarded as a **minimum requirement** rather than a target. A positively prepared plan should therefore include an appropriate supply-side buffer to provide resilience against delayed delivery, build-out issues and the inevitable uncertainties associated with delivering development over a lengthy plan period.
- 3.4. We note that the Council has previously recognised the importance of such flexibility. The Development Strategy Paper explains that:

"Given the considerable uncertainty of the type and size of sites that will make up the housing supply of the Local Plan, a cautious 20% supply buffer was selected and added to the housing requirement when developing the initial options to ensure the impacts (positive and negative) of a sizable supply contingency were taken into account from the outset."
- 3.5. Whilst the Council also notes that the precise level of contingency may evolve as the Plan progresses, the underlying principle remains important. Namely, that a degree of overprovision is necessary to ensure confidence in delivery.
- 3.6. We also note that this approach is consistent with the views expressed by Inspectors elsewhere. In commenting upon the emerging South Warwickshire Local Plan, Inspector Jonathan Bore observed:

"Since one of the purposes of bringing forward the local plan quickly is to remedy the current shortfall in the 5 year supply, the councils are strongly advised to take steps in the plan to raise housing supply further to avoid dropping back into shortfall. A 10% headroom figure is sometimes quoted as a yardstick, but the amount of headroom will depend on the circumstances of both authorities."
- 3.7. The Council's evidence also notes that the adopted Local Plan (2019) benefits from a supply-side buffer of approximately 16%, which was also endorsed by the examination Inspector.
- 3.8. Per our response to Matter 3, Issue 3, once the requirement/supply position is recalculated to account for previous delivery, the surplus falls from 1,657 dwellings to 660 dwellings, reducing the margin above requirement from approximately 12.6% to 5.9%. In our view, a buffer of this scale provides limited flexibility when considered against the level of reliance

placed upon strategic allocations and the uncertainty inherent in forecasting housing delivery over the plan period. Whilst it would still demonstrate sufficient capacity to meet the minimum requirement, we are not persuaded that it provides an adequate contingency against foreseeable delivery risks and changing circumstances. The Plan should therefore identify additional housing sites to increase the size of the buffer.

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?

- 3.9. For the reasons set out in our response to Matter 3, Issue 3, Question 1, the supply prior to the latest calculation of LHN **should not** be taken into account.

Q.4 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?

- 3.10. No comment.

Q.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?

- 3.11. We have not been able to identify any substantive justification for the Plan's windfall allowance of 450 dwellings between 2031 and 2041. Whilst the figure is referenced in the Development Strategy Topic Paper, the paper itself notes that "this will be reviewed as new data becomes available."
- 3.12. It is not clear whether that review has subsequently taken place, what evidence has been considered, or whether the allowance remains justified having regard to more recent monitoring information and expected future trends.
- 3.13. We would therefore welcome clarification from the Council on this matter. Whilst the allowance is not, in itself, of a scale likely to fundamentally alter the overall strategy, it assumes greater importance where the Plan is operating with a relatively modest level of headroom above its minimum housing requirement. In those circumstances, it is important that every component of the anticipated supply is robustly evidenced.

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?

- 3.14. The Plan generally delivers an appropriate range of site sizes, from strategic allocations of approximately 1,000 dwellings and over, through to larger sites in the 300-500 dwelling

range, medium-sized allocations of around 100 dwellings and smaller sites within lower-tier settlements.

- 3.15. Whilst we recognise that larger sites typically have longer lead-in times and can be subject to greater delivery risk, they also offer important sustainability benefits through the provision of strategic infrastructure, the creation of well-designed masterplanned communities and opportunities to achieve comprehensive place-making objectives. The Sustainability Appraisal identifies a number of such benefits associated with strategic-scale development. We also note that the Council has sought to distribute the largest allocations across the District, including at North/West Market Harborough, South of Gartree Road and Scaptoft East, rather than concentrating strategic-scale growth within a single location. Overall, having regard to the scale of growth proposed, we consider that the Plan achieves an appropriate balance between strategic and non-strategic sources of supply.
- 3.16. If additional sites are required to improve flexibility and contingency, they should be directed towards sustainable locations with access to existing services, facilities and infrastructure and should be distributed across the District rather than concentrated in any one area.
- 3.17. The Large Villages, together with appropriate smaller opportunities around the Market Towns, are particularly well placed to perform this role. Such locations could provide a useful source of early and medium-term delivery, strengthen the robustness of the housing land supply and reduce reliance on a small number of strategic allocations without undermining the overall spatial strategy or the benefits derived from the delivery of strategic-scale sites.