



Harborough Local Plan 2011-2031 Examination

Council Responses to the

Matters and Issues

- Statement 2 -

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MATTER 2.1

2.1 Is the uplift of 25 dpa associated with growth at Magna Park appropriate?

- 2.1.1 The Magna Park Sensitivity Study (HSG12) built on and provided sensitivity testing of the HEDNA findings related to scenarios for growth of Magna Park. The Study found that provision of an additional floorspace in line with Policy BE2 (up to 700,000 sq.m) would not affect the HEDNA OAN conclusions at the Leicester & Leicestershire level, but could influence the spatial distribution of this.
- 2.1.2 Magna Park is an existing strategic distribution location, and analysis of where those at Magna Park work using 2011 Census data indicated that 19% live within Harborough District. Commuting patterns are influenced by the accessibility of the site (which is a core component of its commercial attractiveness for distribution activities) and the District geography whereby it is nearer to Rugby and Hinckley than Market Harborough.
- 2.1.3 The Council considers that it is reasonable and positive planning in accordance with Local Plan Objective 2, to seek to accommodate 25% of the future workforce growth in the District. Taking account of the updated demographic analysis as set out in IC3, the latest evidence therefore points to a housing requirement (taking account of Magna Park growth) of 533 dpa (IC3, Table 5.18). This is very similar to the original HEDNA OAN (532 dpa) but lower than the housing requirement figure of 557 dpa derived in HSG12 as a result of lower anticipated growth in life expectancy.
- 2.1.4 The Council's view is that the latest evidence does not point to a meaningful change which would justify changing the housing requirement of 557dpa in the submitted plan. This view is taken in the context of known (but not quantified) unmet need within the HMA and the need to plan positively to help meet this. It considers that in maintaining a housing requirement figure which is above the OAN, the requirement is making a (first-stage) contribution to meeting Leicester's unmet housing needs (see Q2.5 response).

MATTER 2.2

2.2 What are the risks to the achievement of the plan's housing delivery, in terms of infrastructure or other impediments to delivery?

- 2.2.1 The updated Housing Trajectory (HSG14) sets out housing delivery from both committed and planned growth over the plan period.
- 2.2.2 The Housing Trajectory demonstrates a supply of 12,948 dwellings from 2011 to 2031. Of this, 3,042 dwellings have already been completed, with a further 5,750 dwellings either permitted, allocated within a made Neighbourhood Plan or with a resolution to permit subject to completion of a S106 agreement.
- 2.2.3 The delivery of these 5,750 dwellings is not considered to present a risk to housing delivery in the plan. Anticipated delivery rates are based on either: developer assumptions, updated on a 6 monthly basis; or assessed on a site by site basis against the planning stage of each site. The high level of current commitments reflects the recent lack of a 5yr housing land supply together with no post-NPPF Development Plan in place. The 5,750 dwellings already in the system are considered to be able to be built out within the plan period, with the majority of these sites either already commenced on site or considered to be commencing works on site within the next 12 months.
- 2.2.4 Each commitment is assessed through the updated 5 year housing land supply position (HSG15). The updated Local Plan trajectory (HSG14) uses the same delivery assumptions as HSH15 for: the Market Harborough SDA; large sites (both with permission and awaiting completion of an S106); sites allocated in Neighbourhood Plans; and small sites with permission. Due to the nature of the permitted sites, over a range of sizes up to 310 dwellings (excluding the Market Harborough SDA) and a range of locations across the district, with the vast majority on unconstrained greenfield sites, the proposed trajectory for these sites is considered to be sound, with the Council having taken a cautious approach to delivery in recent years. The permitted small sites are not subject to the same level of scrutiny in terms of the projected delivery, and as such a 10% lapse rate is applied to all small sites, including those that have commenced.
- 2.2.5 With the exception of the Market Harborough SDA, none of the sites included within the 5 year housing land supply (HSG15) are considered to have significant infrastructure requirements. As such, subject to the planning process and discharge of conditions, none of the large sites are considered likely to have delivery delayed by significant on- or off- site infrastructure. At the Market Harborough SDA, housing delivery has commenced at the south of the site, and infrastructure works, including provision of a new road bridge over the Grand Union Canal, have commenced to the north of the site. The whole wider site benefits from outline permission, with reserved matters permissions granted for Phase 1 of the central part of the site (135 dwellings,

with reserved matters for the remaining 315 pending consideration) and for parcels to the northern part of the site (79 dwellings approved as Phase 1, with reserved matters applications for Phases 2-5 pending consideration and totalling 501 dwellings). The resulting proposed trajectory, with completion of the site by 2030/31 is considered to be a cautious approach given the recent commencement of infrastructure works.

- 2.2.6 Delivery of both housing and infrastructure for the two Strategic Development Areas proposed at Scraftoft and Lutterworth are covered in the Council's response to questions 8.6 and 8.21 respectively.
- 2.2.7 Of the four proposed site allocations, one benefits from a resolution to grant planning permission subject to the completion of a S106 agreement (Overstone Park), with a further two allocation sites currently with planning applications pending consideration (Burnmill Farm, Market Harborough, and Land south of Arnesby Road, Fleckney). The status of all site allocations is set out in the Council's response to Question 8.1, and any update on these planning applications will be presented at the Hearings. With respect to allocation MH1, Overstone Park, further information is set out in the response to Question 8.11.
- 2.2.8 The pending planning applications for allocations MH3 and F1 propose dwelling numbers above those identified in policy H1 (128 vs 90 dwellings for Burnmill Farm and up to 150 vs 130 dwellings for Arnesby Road), and are expected to be considered by Planning Committee in late September 2018.
- 2.2.9 The Housing Trajectory HSG14 currently sets out a cautious approach to delivery on MH3 and F1 since neither currently benefit from planning permission or a resolution to grant. However it is considered that these sites could potentially both be moved to earlier within the trajectory (subject to any pre-commencement conditions), and at the higher dwelling numbers proposed within their respective planning applications. This is particularly in respect of Burnmill Farm, due to a full application being submitted and the applicant is also a housing developer (David Wilson Homes), suggestive of a potentially faster start date on site. Both of these allocations are greenfield sites, are considered viable, and with no off-site infrastructure requirements.
- 2.2.10 With regards to allocation MH2, East of Blackberry Grange, Market Harborough this site does not benefit from planning permission, and with no application submitted or pre-application discussions commenced. MH2 requires a joint masterplan approach to development alongside the employment allocation of MH6. This site is therefore considered likely to be delivered later in the plan period. The site promoter has suggested commencement of the joint masterplan process in June 2021 together with the EIA (if required), with submission of an outline application in December 2021. Commencement of delivery on site is then expected by the end of 2025 following approval of reserved matters and discharge of conditions, with completion of the development by March 2031.
- 2.2.11 For the residual provision in Rural Centres and Selected Rural Villages, this totals 307 dwellings as of 31 March 2018, a very small proportion of the total

plan provision. This provision is considered likely to be delivered through permissions on smaller sites (vast majority will be less than 50 dwellings), on a wide range of predominately greenfield sites. Further, a proportion of this delivery will be met through forthcoming Neighbourhood Plans, as set out in the Council's response to Question 9 of IC3.

2.2.12 In summary, the housing trajectory as set out (HSG14) is considered to demonstrate the absence of significant risks to delivery in terms of infrastructure or other impediments, for permitted sites or proposed allocation sites. Further discussion with regards to the SDAs are set out in response to Questions 8.6 and 8.21 below, which similarly demonstrate the effective mitigation of any risks to the achievement of the Plan housing delivery.

MATTER 2.3

2.3 Are the assumptions about delivery start dates and rates from the SDAs reasonable?

- 2.3.1 Responses to Issues 8.6 and 8.21 set out the assumptions used in relation to start dates for housing delivery and the proposed annual rates of delivery with regards to the Scraftoft SDA and Lutterworth SDA respectively.

MATTER 2.4

2.4 Is it sound to rely on the headroom provided by the current calculated supply of 12,948 (IC3) to cater for both unmet need from Leicester and any contingency allowance for slower than anticipated delivery from allocated and committed sites?

- 2.4.1 The Council considers that the appropriate OAN excluding any contribution to meeting Leicester's unmet need would be 10,640 dwellings based on the latest evidence (see Q2.1 response). Provision of housing above this level will contribute to addressing the unmet need (see HEDNA (HSG8) Paras 12.37 – 12.40 and Magna Park Study (HSG12) Para 5.12). This principle would appear to have been accepted by the Inspector in main modifications to the Melton Borough Local Plan. As such, the housing requirement of 11,140, which uplifts the OAN by a figure of 25 dpa, represents a redistribution of this level of housing growth from within the HMA and makes a first stage contribution to meeting unmet needs within the HMA.
- 2.4.2 In addition, the total supply of 12,948 provides a further uplift above the housing requirement of 1,808 dwellings. This uplift in supply is considered to be sufficient to provide both: an adequate contingency in supply to cater for slower than anticipated delivery from allocated and committed sites; and to make an important and further contribution to meeting Leicester's unmet need.

MATTER 2.5

2.5 Given that the housing requirement would be the basis for the calculation of the 5 year housing land supply, should it be increased beyond 11,140 dwellings or 557 dpa now in order to allow for a proportion of unmet need for Leicester, or should there be a trigger in the plan which increases the requirement once the amount of unmet need has been quantified?

- 2.5.1 Given the specific circumstances, the latter of the two options would be more appropriate, as anticipated in Policy IMR1(2)b. Annex 1 to this paper includes some further useful HMA-wide context on the housing and planning situation in the HMA, and 'notional' data on housing supply referred to below.
- 2.5.2 The Council consider that any provision above the HEDNA OAN of 10,640 would count towards an unmet need in the HMA. This approach appears to have been considered sound by the Inspector in the recent Melton Local Plan Examination - which is in the Leicester & Leicestershire HMA (see Annex 1 to this paper). Consultation on their Main Mods closed in August 2018 and includes a change to the plan to explain that their housing requirement is higher than the demographic OAN (together with the market signals uplift) in the HEDNA to deliver strategic and economic objectives in the plan. This additional quantity would be drawn from the unmet need present elsewhere within the HMA – i.e. Leicester. The housing requirement of 11,140 in the Harborough plan is 25 dpa higher than the OAN in the HEDNA. In this respect, the housing requirement of 11,140 already contains a 'first stage' redistribution of housing of 25 dpa (500 houses 2011-31) that would make a contribution to unmet need.
- 2.5.3 However, the amount of unmet need in Leicester is uncertain in the short term and it is not considered appropriate to increase the housing requirement for Harborough now to allow for a proportion of unmet need in Leicester as this would prejudge the joint work which the HMA authorities are progressing to consider what level of housing provision can be accommodated in Leicester, and how any shortfall should be distributed amongst the 7 Leicestershire authorities.
- 2.5.4 The publication of the new NPPF means that the quantification of unmet need and its agreed distribution will now be based on the standard method for calculating housing need (not the HEDNA). The quantification of unmet need requires a robust and consistent assessment of housing need and supply and there is uncertainty about both in the short-term (see Q3 of IC3).
- 2.5.5 The new NPPF also requires plans to meet as much housing need as possible, locate housing in sustainable locations to minimise the need for travel, build at higher densities and protect greenfield land as far as possible. Leicester is the most sustainable location in the HMA with brownfield regeneration opportunities. It is therefore important that it is able to

complete a review of land supply, including testing the potential for higher density development, to ensure these wider sustainability objectives are not undermined. Taking this into account, it would not be appropriate to increase Harborough's housing requirement 'now'.

- 2.5.6 Once there is clarity on the scale of any unmet need, agreement will then be reached on how it will be apportioned amongst the 7 Leicestershire authorities - at least 6 Leicestershire authorities have a theoretical capacity to accommodate additional growth (See S2 – Duty to Cooperate Statement, Appendix B).
- 2.5.7 There is however sufficient flexibility in the housing supply of 12,948 in the Harborough Local Plan to increase the housing requirement and provide a contingency for under delivery and other factors, once the scale and distribution of unmet need has been agreed. Rather than increasing the requirement figure now, a trigger which increases the requirement, if necessary, once the amount of unmet need has been quantified and the apportionment across the HMA authorities agreed, would be the most appropriate approach in the specific circumstances of a future HMA-wide agreement under the new NPPF, future quantification of unmet need against the standard method (not HEDNA), and the current short-term uncertainty of housing need and supply in Leicester.
- 2.5.8 Leicester are expected to publish their plan in 2019/20 and decisions on the amount of unmet need and its distribution will be made against the standard method, once Leicester has completed its land supply review. It is therefore important that any trigger to increase the housing requirement in the plan reflects this reality and would adequately 'future proof' the plan against this scenario. This is particularly important because once adopted (in 2019) judgements about whether Harborough Local Plan makes adequate provision for housing (including any unmet need) will be made under the new NPPF and the standard method for calculating housing need.
- 2.5.9 Quantifying any specific increase to the housing requirement at the current time would be difficult. 'Notional' figures indicate that the unmet need in Leicester could be 9,587 (2011-31) against the HEDNA but would come down to 4,745 (2018-31) against the standard method (see Appendix A and B of Annex 1). The Harborough Local Plan contains a supply of land to deliver 9,904 houses from 2018 to 2031 (HSG 14), which is 2,858 (41%) higher than Harborough's need of 7,046 (542 dpa) against the standard method (2018-31). There is therefore sufficient headroom in the supply to 'future proof' the plan against a reasonable proportion of unmet need that Harborough would be expected to take against the standard method, given that there are 7 authorities in Leicestershire and at least 6 of them have a theoretical capacity several thousand dwellings higher than their OAN (See table 1 in Appendix B of S2 – Duty to Cooperate Statement).
- 2.5.10 It is important that the Council is able to maintain a 5 year supply against any increased housing requirement. The Council does not consider it appropriate that any unmet need which is accommodated within the plan should be 'back dated' resulting in a higher requirement in previous parts of the plan period,

generating a historical shortfall in delivery. Given that the standard method identifies the housing need from the current year forward (i.e. the year the calculation is done – 2018 onwards at present) there should be no need to back date an increase in the housing requirement. Any trigger that increases the housing requirement to meet unmet need should operate by increasing the housing requirement from the year the unmet need is quantified and its distribution agreed.

2.5.11 Leicester's unmet need is expected to be quantified and agreed in 2019/20. A trigger could increase the housing requirement from that year forward to a figure that reflects the agreed proportion of Leicester's unmet need that Harborough should make provision for.

2.5.12 There is sufficient flexibility in the supply of 12,948 houses (HSG14) to allow for any reasonable contribution that Harborough would make towards meeting Leicester's unmet need based on the notional figures that exist at present, the figures below are given as an example to demonstrate the potential flexibility that exists. They should not be interpreted as a suggested or agreed contribution that Harborough should make.

2.5.13 If Harborough accommodated one sixth (16.67%) of Leicester's unmet need from 2019/20, that would be 791 houses 2019-31 (66 dpa) based on the 'notional' unmet need figure of 4,745 houses in Leicester. The 66 dpa when added to the OAN of 532 dpa gives a new higher requirement of 598 dpa from 2019 to 2031. If the 66 dpa is added to Harborough's Local Housing Need figure of 542 dpa calculated using the standard method, this would give a new requirement of 608 dpa from 2019 to 2031. The plan would therefore contain a requirement of 11,752 dwellings 2011-31 (557 dpa 2011-19 plus 608 dpa 2019-31). The total supply of 12,948 houses is some 1,196 houses (10%) higher than this requirement, which would act as a contingency against under delivery if needed.

2.5.14 If Harborough accommodated one fifth (20%) of Leicester's unmet need from 2019/20 the requirement would increase to 621 dpa (2019-31) when added to the need of 542 dpa using the standard method. Once triggered the plan would therefore contain a requirement of 11,908 dwellings 2011-31 (557 dpa 2011-19 plus 621 dpa 2019-31). The total supply of 12,948 houses is some 1,040 houses (9%) higher than this requirement, which would act as a contingency against under delivery if needed.

Conclusion

2.5.15 Given the uncertainty around the scale of Leicester's unmet need and the need to agree its apportionment between the 7 Leicestershire Authorities, it would not be appropriate to increase the housing requirement in the plan now – any significant increase to the housing requirement would be arbitrary at this stage. A trigger that allows the housing requirement to be increased once the unmet need has been quantified and its distribution agreed is the most

appropriate option. The analysis above shows that the plan contains sufficient supply to allow for a reasonable contribution from Harborough towards meeting Leicester's unmet need (based on 'notional' figures) and still provide a 10% contingency for under delivery. A higher proportion of the unmet need could potentially be met with a reduced, but still substantial, contingency for under delivery.

ANNEX 1 – Background Paper on the HMA-wide Housing Land Supply

Introduction

The HEDNA has provided stable housing need figures for plan making since January 2017. It provided a sound basis for the Northwest Leicestershire Local Plan adopted November 2017, and no substantive concerns have been raised by Inspectors examining plans in Melton and Oadby & Wigston, both of which are at ‘Main Mods’ stage. Hearings for the submitted Harborough Local Plan are in October 2018.

One of the main reasons for the ‘stability’ of housing figures since January 2017 is that the HEDNA is an up-to-date assessment of housing need that complies with the 2012 NPPF.

The broad position on joint working under the HEDNA is in the Joint Statement of Cooperation (Nov 2017) (Appendix B of S2 – Duty to Cooperate Statement) which compares the housing need from the HEDNA with potential capacity based on existing commitments and SHLAA assessments. It demonstrates that against the HEDNA figures, there is sufficient capacity within the HMA to meet the housing need in the HEDNA with considerable flexibility. However, the ability of individual authorities to meet their own need varies. Leicester City is the only authority in the HMA to declare an unmet need to 2031 against the HEDNA. Leicester and Oadby & Wigston have declared an unmet need to 2036 – All unmet needs remain unquantified. In this context, the L&L authorities agree that plans produced in advance of any agreement on housing distribution, should contain appropriate review triggers to ensure they can be updated when HMA-wide agreement is reached, unless there is sufficient flexibility provided for within the plan.

Since publication of the HEDNA it has been the intention of the HMA authorities to agree the distribution of housing through a Memorandum of Understanding (MOU) to 2031. However, the unmet need from Leicester remains unquantified due to unforeseen delays in their plan preparation. During this time four ‘HEDNA based’ local plans have been submitted for examination and the table below sets out the stage that they are at:

Local Plan	Stage
Northwest Leicestershire (2011-31)	Adopted November 2017
Melton (2011-2036)	Main Mods Consultation closed 3 rd August 2018
Oadby and Wigston (2011-31)	Main Mods Consultation Imminent
Harborough (2011-31)	Hearings to be held in October 2018

*** Blaby have submitted a ‘Part 2’ Local Plan with hearings held in August 2018. This plan does not contain a housing requirement, but allocates sites to meet the requirement in their Core Strategy (adopted 2013).**

Three HEDNA based plans have progressed through to ‘main mods’ stage and beyond, with the HEDNA considered a robust basis for determining housing need by

the respective Inspectors. Harborough is the next and final plan to be examined based on the HEDNA. All of the HEDNA based Local Plans contain 'triggers for review' to ensure that the housing needs can be met.

Consultation on the proposed Main Modifications on the Melton Local Plan closed in August 2018. MM1 included the following changes:

"THE HOUSING REQUIREMENT AND ITS PLANNED DELIVERY

The number of new homes.....more jobs and improve opportunities. The Melton Towards A Housing Requirement (TAHR)(January 2017) report and its addendum (June 2017) indicated that taking account of wider considerations, there was a clear justification for planning for between 5,750 and 7,000 dwellings, equivalent to 230-280 dwellings per annum. The Council has agreed a housing requirement of 245dpa, within that range. **The overall quantity proposed is 6125 houses over the plan period of 2011 – 2036. This quantity would meet the demographic needs with affordability adjustment identified by HEDNA of 154 per year (3850 over the plan period) with the additional quantity of 91 per year (2275) required to deliver the strategic and economic objectives of the Plan set out in Chapter 3. This additional quantity would be drawn from the unmet need present elsewhere within the Housing Market Area (HMA). Only the City of Leicester have formally declared unmet need up to 2031 and requested that unmet need be dealt with in the Melton Local Plan. Should unmet need be declared elsewhere within the HMA within the local plan period, the apportionment across HMA authorities of all unmet need arising within the HMA shall be agreed as set out in a Memorandum of Understanding (see paragraph 4.7.8). If the unmet needs apportioned to Melton Borough exceed the 2275 dwellings, there may be a need for a full or partial review of the Local Plan, in accordance with Policy SS6.**

It is therefore considered that any provision above the OAN in the HEDNA of 10,640 (532 dpa) could be counted towards an unmet need in the HMA.

The Impact of the 2018 NPPF

On 24th July 2018 the Government published a new NPPF changing National Policy in various ways including a new 'standard method' to calculate housing need and strengthening the Duty to Cooperate. The 2018 NPPF supersedes all policies in the 2012 version and applies immediately to all planning authorities, except for the purposes of examining plans submitted before 24th January 2019 where the previous NPPF 2012 will apply. Harborough will be the last of the current generation of plans in the HMA to be examined against the 2012 NPPF - all plans that follow must be consistent with the 2018 NPPF.

It is clear from the different stages in which the constituent authorities find themselves that HMA wide agreement on a 'HEDNA based' distribution of housing (including unmet needs from Leicester) would be unrealistic, particularly in the context of the clear indication in the recently published Framework that the standard method should be used in plan making. It is unlikely that a HEDNA based MOU would provide a 'sound' basis for plan preparation going forward. In this respect, any

agreements on housing distribution will be 'standard methodology' based and compliant with the new NPPF.

Identifying the Scale of Unmet Need

There is likely to be some short term uncertainty about the scale of unmet need which requires an understanding of what the housing need is, and the land supply.

Need: Housing need from the HEDNA and the standard method are contained in Appendix A and B of this paper. However, new household projections are anticipated in September which could change the housing need and the Government is going to consider reviewing the standard method and consult on any specific changes. This causes some short term uncertainty about the emerging housing need position in the HMA.

Supply: Leicester City consulted on emerging options (Reg. 18) between July-December 2017 which identified a potential land supply comprising existing completions and commitments of 18,900¹ together with additional capacity of 7,100 dwellings on SHLAA sites. This indicates a total supply of 26,000 2011-31. The consultation however made clear that the City Council were undertaking further work on the capacity of the City to address this shortfall, and was encouraging further potential development sites to be put forward.

At the current time, this review of land supply in Leicester is ongoing and will now need to take into account the 2018 NPPF which includes requirements to meet as much housing need as possible, locate housing in sustainable locations to minimise the need for travel, build at higher densities and protect greenfield land as far as possible. Given that Leicester is the most sustainable location in the HMA with brownfield regeneration opportunities, it is important that it is able to complete the review of land supply to ensure these objectives are not undermined.

Notional Work on Quantification to date

In this respect the quantification of any unmet is uncertain in the short term and the standard methodology and the timing of Leicester's Local Plan has significant implications for the amount of unmet need. The amount of unmet need in Leicester City would drop by some 5,092 houses from a notional 9,837 against the HEDNA in March 2017 (Appendix H of S2), to 4,745 houses against the Standard Method in March 2018 (Appendix B).

Appendix A of this document contains an updated table showing a supply position against the HEDNA at 31st March 2018 (this is an update of the table in the 'Leicester & Leicestershire Joint Position Statement on Housing and Employment Land Supply 2011 – 2031 which shows the position at 31st March 2017 – see Appendix H of S2). Appendix B of this document contains an amended table showing the position against the standard method for each authority. The guidance

¹ Comprising completions 2011-16, units on sites under construction, with full and outline planning permission and a small sites allowance 2016-31.

is clear that the most recent household projections should be used to calculate the projected average annual household growth, with the current year being the first year. This is why the calculation of need has been rebased to 2018 rather than 'back dated' to 2011.

Appendix A indicates that 'notionally' the projected delivery of 98,885 houses across the HMA is some 2,305 houses above the need in the HEDNA of 96,580 (2011-31). However, when considering the potential supply against the standard method, Appendix B indicates that the projected total delivery 2018-31 is some 7,779 above the need.

Although the average annual need using the standard method is broadly similar to the HEDNA, the rebasing to 2018 has a significant impact on the level of housing provision required to 2031, and the unmet need in Leicester in particular. Appendix A indicates a 'notional' unmet need in Leicester of 9,587 houses against the HEDNA (2011-31). Some 4,413 of this comes from historic under delivery between 2011 and 2018. In addition, the annual average need of 1,659 dpa using the standard method is 33 dpa lower than the HEDNA figure of 1,692, reducing the unmet need by a further 429 houses (2018-2031). Leicester's unmet need has therefore dropped by some 4,842 houses when using the standard method, instead of the HEDNA. Compared to the supply of 16,822 – which includes a 'notional' figure of 2,900 – the unmet need in Leicester would be some 4,745 to 2031 using the standard method, compared to 9,587 against the HEDNA.

Whilst it is accepted that further refinement of the figures in Appendix B may be required, it does not appear to suggest a need for any authority to change their position on declaring an unmet need at present (to 2031 or 2036). It also gives some comfort that the potential level of provision in existing and emerging Local Plans could deliver sufficient housing across the HMA to 2031. This will provide a useful starting point for HMA-wide discussions and agreement on housing distribution.

Leicester's Local Plan will be one of the first plans produced under the new NPPF, which is helpful in many respects, because it will mean that the level of unmet need will be known at an early stage allowing authorities to agree the scale and distribution of housing across the HMA.

The Leicester & Leicestershire Strategic Growth Plan (SGP)

The Leicester & Leicestershire Authorities have a long track record of working well together and the Draft Strategic Growth Plan (SGP)² is an example of this. Appendix B of the SGP includes some housing numbers for the Post 2031 period, including a significant redistribution of housing from Leicester to other authorities such as Harborough. Whilst this does not have a direct impact upon the submitted Local Plan which goes to 2031, it is a clear demonstration that the Authorities in the HMA recognise the importance of joint strategic planning, and are willing to make difficult decisions to deliver the development that the area needs.

² http://www.llestrategicgrowthplan.org.uk/download/pdf_document/ONLINE-Strategic-Growth-Plan-9-Jan-2018.pdf

This has not yet happened for the pre-2031 period because the unmet need is unquantified due to unforeseen delays in Leicester's plan preparation. Agreement will be reached once the unmet need has been quantified.

Appendix A - Housing Land Supply as at 31 March 2018 – Compared to HEDNA

Authority	OAN 2011-2031	Completions 2011 to 2018	Commitments ¹ projected for delivery 2018 to 2031	Allocations in an adopted Local Plan ²	Emerging allocations in a draft plan ²	Allowance for small site or windfall development ²	Notional guide figure for estimated supply in currently unpublished plans ³	Projected total delivery to 2031	Commitments ⁴ not projected for delivery until beyond 2031
Blaby	7,400	3,337	5,254	-	758	390	-	9,739	520
Charnwood	20,620	5,406	6,693	3,070		640	4,811	20,620	3,720
Harborough	10,640	3,042	5,750		3,931	225		12,948	
Hinckley & Bosworth	9,420	3,394	4,313	1,712			1,884	11,303	605
Leicester City	33,840	7,431	9,472	2,500		1,950	2,900	24,253	1,000
Melton	3,720	777	2,622		2,415	290		6,104	
NW Leics	9,620	4,037	5,603	1,317		520		11,477	2,550
Oadby & Wigston	2,960	685	819		1,501	104		3,109	
HMA total	96,580	28,109	40,526	8,599	8,605	4,119	9,595	99,553	8,395

¹ Includes sites under construction or with the benefit of planning permission, including sites with a resolution to grant, as at 31/03/2018

² In each case the figure relates solely to projected delivery during the period prior to 31/03/2031; includes plans published since 31/03/2018

³ The figures given represent working assumptions of the notional capacity (to 2031) of new allocations to be made in future local plans; they are provided solely to inform estimates of overall capacity and do not pre-empt due local plan process.

⁴ Includes sites with the benefit of planning permission, including sites with a resolution to grant, plus allocations in an adopted plan, all as at 31/03/2018

Appendix B - Housing Land Supply as at 31 March 2018 – Compared to Local Housing Need

Authority	Local Housing Need 2018-2031	Commitments ¹ projected for delivery 2018 to 2031	Allocations in an adopted Local Plan ²	Emerging allocations in a draft plan ²	Allowance for small site or windfall development ²	Notional guide figure for estimated supply in currently unpublished plans ³	Projected total delivery to 2031	Commitments ⁴ not projected for delivery until beyond 2031
Blaby	4,498	5,254	-	758	390	-	6,402	520
Charnwood	14,144	6,693	3,070		640	3,741*	14,144	3,720
Harborough	7,046	5,750		3,931	225		9,906	
Hinckley & Bosworth	6,084	4,313	1,712			1,884	7,909	605
Leicester City	21,567	9,472	2,500		1,950	2,900	16,822	1,000
Melton	2,600	2,622		2,415	290		5,327	
NW Leics	4,784	5,603	1,317		520		7,440	2,550
Oadby & Wigston	1,872	819		1,501	104		2,424	
HMA total	62,595	40,526	8,599	8,605	4,119	9,595	70,374	8,395

¹ Includes sites under construction or with the benefit of planning permission, including sites with a resolution to grant, as at 31/03/2018

² In each case the figure relates solely to projected delivery during the period prior to 31/03/2031; includes plans published since 31/03/2018

³ The figures given represent working assumptions of the notional capacity (to 2031) of new allocations to be made in future local plans; they are provided solely to inform estimates of overall capacity and do not pre-empt due local plan process.

⁴ Includes sites with the benefit of planning permission, including sites with a resolution to grant, plus allocations in an adopted plan, all as at 31/03/2018