

Gladman Developments Ltd.

Matter 2 Hearing Statement

Harborough Local Plan

The Housing Requirement and its Delivery



September 2018

Matter 2 – The Housing Requirement and its Delivery

1.1. Q2.1 Is the uplift of 25dpa associated with growth at Magna Park appropriate?

1.1.1. Further to the HEDNA study, an additional piece of work was carried out by the Council to consider the potential impact on housing requirements of the strategic storage and distribution growth proposed at Magna Park. The Magna Park Employment Growth Sensitivity Study 2017 concluded that the overall housing requirement in Harborough should be increased to 557dpa to account for the increased growth in employment associated with Magna Park.

1.1.2. Gladman support this increase in the housing requirement, above the baseline identified housing need, to support a specific economic growth requirement in the district. This is especially as the HEDNA did not propose any economic growth adjustment across the Leicester and Leicestershire area as a whole. There are significant levels of growth proposed at Magna Park up to 2031 and it is essential that sufficient population and labour force growth is provided within Harborough to support this economic growth and thus avoid potential unsustainable commuting patterns.

1.2. Q2.2 What are the risks to the achievement of the plan's housing delivery, in terms of infrastructure or other impediments to delivery?

1.2.1. Answered in a separate Hearing Statement prepared on our behalf by Planning Prospects.

1.3. Q2.3 Are the assumptions about delivery start dates and rates from the SDAs reasonable?

1.3.1. Answered in a separate Hearing Statement prepared on our behalf by Planning Prospects.

1.4. Q2.4 Is it sound to rely on the headroom provided by the currently calculated supply of 12,948 dwellings (IC3) to cater for both unmet need from Leicester and any contingency allowance for slower than anticipated delivery from allocated and committed sites?

1.4.1. Gladman support the Council's approach to providing flexibility in the housing land supply in order to account for slippages in housing delivery. However, it is considered that the proposed 15% flexibility factor outlined should be the considered as the minimum level and could be increased to 20% given the Council are relying upon a small number of large scale Strategic Development Areas (SDAs) to deliver their housing growth.

1.4.2. SDAs are complex and difficult to bring forward, as has been highlighted recently in the Letwin Review and therefore, in order to guarantee that a 5-year housing land supply is maintained, particularly in the early years of the Plan period, a greater level of flexibility may be required.

1.5. Q2.5 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 557dpa now in order to allow for a proportion of unmet for Leicester, or should there be a trigger in the plan which increases the requirement once the amount of unmet need has been quantified?

1.5.1. The issue of Leicester City's unmet housing needs is one which has been discussed at length at recent local plan examinations across Leicestershire including North West Leicestershire, Oadby and Wigston and Melton and yet we are no closer to resolving the issue. Leicester City and the other Leicestershire authorities are failing to resolve the issue of the quantification of the unmet need and how it will be re-distributed.

1.5.2. The Strategic Growth Plan which has been in preparation for a considerable length of time has been delayed on numerous occasions and it is no clearer as to when this document will be adopted, if it actually will, and how it will deal with the issue of the redistribution of unmet housing need. Initially, it was suggested that a Memorandum of Understanding (MoU) would be signed which would resolve this issue. However, with the publication of NPPF2 and the need to prepare Statements of Common Ground, this is now far from clear. The signing of the MoU had already been significantly delayed prior to the publication of NPPF2 and now it appears that further delay is inevitable.

1.5.3. This is not acceptable, particularly given that Leicester City's unmet needs stem from 2011 and already stand at around 3,000 units to date, without quantification of the unmet need going forward to 2036. These figures represent real people in need of housing now and it is unacceptable to make them wait longer whilst the unmet need is quantified over a longer period, redistributed and a further round of Local Plan preparation is undertaken across all the Leicestershire authorities to allocate suitable sites.

1.5.4. A level of flexibility should therefore be built into the Harborough Plan to accommodate at least some of the unmet housing need from Leicester now, especially as we know that it is not a question of whether there will be unmet need but a question of how much. This flexibility should be in the form of additional, small scale housing allocations in sustainable settlements, which could deliver in the early years of the Plan period and which could help to meet the existing unmet housing needs of Leicester from 2011 onwards.

- 1.5.5. If, however, the Inspector considers that a trigger mechanism for a Local Plan Review is the most appropriate way of dealing with Leicester City's unmet housing need issue, then it is essential that this review mechanism is effective and implementable.
- 1.5.6. The Council highlight the issues relating to the Local Plan review in Policy IMR1 of the Plan. This Policy states that should a review of the Local Plan be necessary, the Council will commence a review of the Plan within 12 months of the need for a review being established.
- 1.5.7. Policy IMR1 is considered to be ineffective in its current format. The Policy refers to commencing a review within 12 months of the need for a review being established, but there is no specific timeframe for completion of the review. This means that the Council has no specific imperative to do anything but start the review process which may, under the current policy, never be completed. There is of course no definition of the term 'commenced' which could, in its simplest terms, mean beginning the collection of evidence.
- 1.5.8. It is therefore suggested that in order to be as effective as possible, the review mechanism should be contained in a policy within the Monitoring Framework section and should be far more robust and set within a definitive timescale.
- 1.5.9. The Harborough Local Plan Review Mechanism should therefore read:

Harborough District Council is committed to meeting its requirements for housing, employment and other development and infrastructure. The Council will regularly monitor delivery of new development in the context of policies and targets within this Plan. Where monitoring identifies significant and persistent shortfalls in the delivery of housing and employment, infrastructure or spatial distribution that deviates significantly from the Plan strategy, or there are changes within the HMA to the objectively assessed need for development or the spatial distribution of growth across the HMA, the Council will commence a full or partial review of the Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012) within 6 months of the occurrence, of one of the following events:

- (i) **5 years from adoption of the Local Plan and every 5 years subsequent to the completion of the Review; or**
- (ii) **the identification in the Strategic Growth Plan or Memorandum of Understanding of a quantity or spatial approach that is significantly different to that set out in the Local Plan, unless there is sufficient numerical flexibility in housing supply already provided for within the Local Plan; or**

- (iii) changes occur within the HMA to the objectively assessed need for development or the spatial distribution of growth across the HMA including Harborough; or**
- (iv) where, when demonstrated by the Monitoring Framework that aggregate housing completions over any rolling three-year period following adoption of the Local Plan are in excess of 20% beneath the planned targets in housing trajectory.**

Any Plan review arising from the above should be carried out quickly. Any such review shall be submitted to the Secretary of State for examination within two years of commencement of such review.