

Homes England

Hearing Statements for Harborough Local Plan 2011 - 2031

Matter 2

Prepared by WYG Environment Planning Transport
Limited

September 2018

Preamble

- 1.1 WYG are instructed by Homes England, formerly Homes and Communities Agency, ('our client' hereafter) to provide planning consultancy advice in respect of their land interests at land at Stretton Hall Farm, Great Glen ('the Site' hereafter), which lies within the boundary of the District of Harborough Council.
- 1.2 Detailed comments have been made to the Proposed Submission stage of the Harborough Local Plan 2011 to 2031.
- 1.3 WYG have been representing the client since May 2018. Prior to WYG's involvement, representations were submitted to the emerging Harborough Local Plan on behalf of our client by Amec Foster Wheeler. Amec Foster Wheeler and WYG have prepared a complete suite of environmental and geotechnical studies/assessments of the Site.
- 1.4 Since the previous representations were submitted in December 2017, the Homes and Communities Agency has been rebranded as Homes England and given a stronger focus on the delivery of homes by the Government. This enhanced role includes the ability to acquire land and assemble sites where it assists in bringing forward strategic sites for new homes. Based on this new role, Homes England has acquired an option on a further 17 hectares of land fronting London Road to assist in the delivery of a strategic access to the A6.
- 1.5 Our client's land interest extends to 113 hectares of land at Stretton Hall Farm which lies adjacent to the border with Oadby and Wigston Borough Council and the Leicester Principle Urban Area (PUA). The majority of our client's land interest is shown edged in red on drawing A090070-456-001. The Site comprises land in agricultural use and bounded to the west by existing residential uses on the edge of Oadby and the south east by the Leicester Grammar School campus. Existing residential development, built in the 1990s on the site of the former Stretton Hall hospital, is located to the north-east of the site.
- 1.6 The Site is available and suitable for delivering new homes, for all sectors of society, during the Harborough Local Plan 2011-2031 period. Our client is not seeking to promote their entire land interest in the Harborough Local Plan but up to 500 homes and an extra-care facility on the southern part of the Site (see drawing no A090070-456-001) in tandem with the development of a nationally important sporting hub linked to the existing high-quality sporting facilities at Leicester Grammar School.
- 1.7 The representation submitted to the Proposed Submission draft of the Harborough Local Plan on behalf of our client identified a potential unmet need for new housing during the Plan period both within the District of Harborough and the adjacent Leicester PUA. In addition to its role as landowner our client is also an important housing delivery partner in the District of Harborough and with a Government remit to deliver a significant level of new homes in England in this Parliament.

- 1.8 If this unmet need is confirmed the land at Stretton Hall Farm offers the opportunity to deliver new homes and important sporting infrastructure in the next 1-5 years.
- 1.9 This Hearing Statement seeks to reiterate and update where necessary, comments previously made in respect of the Proposed Submission stage of the Harborough Local Plan 2011 to 2031 to confirm our Client's position. The Statement is structured under the following broad themes, flowing from the Inspector's Matters and Questions:

Matters to which this Statement refers:

Matter 2 – specifically Inspector's questions 2.4 and 2.5.

Matter 2: The housing requirement and its delivery

Inspector's Question 2.4: *"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 Leicestershire and any contingency allowance for slower than anticipated delivery from allocated and committed sites?"*

- 2.1 The Council's revised housing supply figure of 12,948 dwellings in IC3 is noted and understood to represent a 16% contingency rate above the OAHN figure for the District of 11,140. Our client does not dispute the Council's supply figure per se but, like the Inspector, is keen to ensure that the Local Plan contains sufficient flexibility to ensure that homes are delivered at the rate envisaged by the Council during the plan period and specifically in the next five years. On this basis, it is noted that the revised housing trajectory (HSG14) dated August 2018 does not envisage the proposed SDA sites at Lutterworth East and Scraftoft North making a major contribution to local housing supply until at least year 2024/2025.
- 2.2 The revised housing trajectory assumes an accelerated annual delivery rate, based on the SDAs coming on stream, in the latter years of the plan period to balance against a low delivery rate for the early period of the plan period i.e. 2011-2017. The reliance on two large scale housing sites to deliver significant housing supply in the District of Harborough post 2024/25 does not provide the Council with sufficient flexibility, required by the NPPF, in the event that delivery rates on these sites fall below the predicted rates. Other sites should be considered to ensure a consistent level of housing supply.
- 2.3 The Council acknowledges that the OAHN figure used in the local plan excludes a contribution towards the unmet housing needs of Leicestershire on the basis that a precise figure is unknown. Whilst it is accepted that an overall figure has not been agreed between the authorities in the HMA it is clear that the Leicester City Council shortfall may be in the order of 8,000-9,000 homes¹ and that a proportion of any shortfall will fall to be accommodated within the District of Harborough Council area. In the absence of a specific apportionment figure being agreed it is considered that a 'reasonable' contingency figure is set out in this Local Plan.
- 2.4 The NPPF (2014) sets out a buffer figure of 20% for housing delivery where there is a persistent under delivery of housing in a Local Authority area. This figure has been carried forward into the NPPF (2018) at paragraph 73. Whilst our Client is not suggesting that the District of Harborough Council persistently under delivers on housing it is considered that **20%** is a reasonable and definable contingency figure for a Local Plan to adopt to demonstrate flexibility and choice in the local housing market including any slowing in the

¹ Letter from Leicester City Council to all authorities in the Leicester and Leicestershire HMA dated 13th February 2017. (Appendix D – Duty to Cooperate Statement March 2018).

anticipated delivery rate. The use of a 20% contingency is, therefore, more 'sound' than the arbitrary 16% that is now being suggested by the Council.

- 2.5 The use of a 20% contingency figure equates to an additional 420 dwellings towards meeting the, as yet undefined, future unmet need for Leicester City Council, and a housing supply figure within the Local Plan of **13,368**.
- 2.6 The Council contends that Policy IMR1 provides a suitable mechanism to review housing delivery levels and OAHN (including the unmet needs of Leicester City Council area) during the plan period and, in specific cases, trigger a Review of the Local Plan. The provisions of Policy IMR1 could equally include a review as to the appropriateness of the proposed 20% contingency figure. In the unlikely event that this figure was considered too high then Policy IMR1 could trigger a review of the Local Plan.
- 2.7 Homes England is the Government agency tasked with accelerating housing delivery in England, both open market and social/affordable, within the current Parliament i.e. up to June 2022. Homes England's role in the delivery of sites includes site acquisition and site promotion together with assistance with overall funding and construction via its delivery partners. Homes England is also committed to ensuring that all residential schemes meet Building for Life 12 standards.
- 2.8 Our client is therefore uniquely placed, and with an established track record, to ensure that new homes are delivered in the public interest and contribute to meeting the needs of the local community.
- 2.9 The Site at Stretton Hall Farm is within our client's ownership and thus there is no immediate impediment, notwithstanding the need for planning approval, for up to 200 residential units (and circa 100 extra-care units) coming forward on the Site within 5 years of the adoption of the local plan and a further 300 residential units within 5-10 years of the adoption of the local plan. The delivery of these units will contribute to the District meeting the revised housing supply figure and specifically the 20% contingency figure.

Inspector's Question 2.5: *"Given that the housing requirement would be the basis for the calculation of the 5 year housing 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?"*

- 3.1 The comments set out in respect of Question 2.4 in respect of a 20% contingency figure to meet a proportion of the, as yet undefined, needs for Leicester City Council and slower housing delivery rates are also pertinent to Question 2.5.
- 3.2 Since the publication of the SHMA Report in 2014 a shortfall in the ability of Leicester City Council to accommodate all its housing needs within its own boundary has been in the public domain. The precise quantum of this shortfall is still unknown and, more importantly for this local plan examination, the subsequent agreement of any apportionment arrangement with the adjoining local authorities unlikely to be confirmed for several years. On this basis, to not make any allowance for the unmet needs of Leicester City Council at this time will result in the entire shortfall needing to be 'delivered' in the latter years of the plan period, via a higher dwelling per annum rate, rather than being delivered in gradual manner throughout the Plan Period.
- 3.3 In addition, the absence of any allowance in the current Local Plan means that a full review of the Local Plan, under the provisions of Policy IMR1, is likely to be triggered. Such a review is unlikely to be completed quickly thus further delaying the delivery of sites for new homes.
- 3.4 In the absence of a specific figure for Leicester City Council's unmet need a reasonable and sound contingency figure should be 20% and this should be incorporated in the housing supply figure used in this Local Plan.

Project title
Stretton Hall

Drawing title
Land at Stretton Hall Initial Phase

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NTS



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