

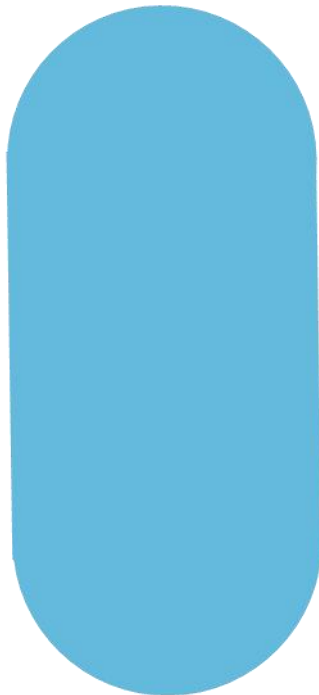
Harborough Local Plan Examination

Matter 2 – The Housing Requirement and its Delivery

Hearing Statement

David Wilson Homes

Respondent reference: 6254





This Hearing Statement is submitted on behalf of David Wilson Homes (DWH; respondent reference 6254) in respect of their interest at Smeeton Road, Kibworth. Representations relating to this site were submitted on behalf of DWH to the Proposed Submission Local Plan.

Matter 2: The housing requirement and its delivery

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 Leicester and any contingency allowance for slower than anticipated delivery from allocated and committed sites?

1. As acknowledged by the Council in IC3, “the scale of unmet need arising from Leicester is in a state of flux”. HEDNA suggests a need within Leicester for 33,840 dwellings between 2011 and 2031, compared to an estimated supply of 26,000 dwellings (a combined total of a recent Regulation 18 call for sites and the SHLAA). Although further work is being carried out by Leicester City Council to investigate supply, this leaves a shortfall of 7,840 dwellings to be met within neighbouring authorities. It is yet to be agreed where this unmet need will be met, what proportion will be directed towards Harborough and how Harborough’s proportion will be distributed within the district.
2. As such, the Harborough Local Plan has not had sufficient regard to how the Council will meet Leicester’s unmet housing need. Harborough cannot keep relying on the Principal Urban Area to meet this unmet need and should be considering the ongoing contribution that can be made by sustainable settlements within easy reach of Leicester.
3. Settlements such as Kibworth, which are sustainable in their own right but also within easy access of Leicester can make a contribution to Leicester’s unmet need. However, in Kibworth, the spatial strategy is determined by a Neighbourhood Plan which a) does not allocate sites for housing and b) has not been provided with a housing requirement by the Council. As a result, there is a risk that the 12,948 dwellings identified in the Plan will be insufficient to meet a potential increased housing requirement in appropriate, sustainable locations (particularly when combined with any delays to the delivery of allocated sites which may occur). The Plan therefore is not considered to be positively prepared in accordance with the soundness tests defined by the Framework.

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 557dpa 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?

4. Given that the Council has included a c.16% contingency in its supply, a similar contingency could be applied to its housing requirement. However, as it is difficult to ascertain precisely what the uplift to the Council’s requirement will be, this is unlikely to meet the necessary soundness test. As a result, a trigger would be the more appropriate option.



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5. However, the suggested trigger within Policy IMR1 (that if a review is necessary as a result of insufficient flexibility in the plan to meet unmet need this will be commenced within 12 months) is not considered to be responsive enough. Reviews of Plans are required to be **completed** no later than five years in normal circumstances (paragraph 33, 2018 NPPF), yet the situation in Harborough is different because the Local Plan is being progressed without having due regard to Leicester’s unmet need. If it is established in due course that the Plan is insufficiently flexible, this should trigger an immediate partial review of the Plan. This would help reduce the timescales for the review of housing need and accord with the government’s objective of significantly boosting housing supply.

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