

2018

HARBOROUGH LOCAL PLAN EXAMINATION

MATTER 2: THE HOUSING REQUIREMENT AND ITS
DELIVERY

PLANIT-X ON BEHALF OF SCRAPTOFT PARISH COUNCIL AND
THURNBY & BUSHBY PARISH COUNCIL

PLANIT-X TOWN & COUNTRY PLANNING SERVICES | info@planit-x.co.uk

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?

Introduction

1. Leicester City Council has indicated that there will be unmet housing need within the City. A letter from Leicester City Council to all the other local planning authorities in the HMA dated 13 February 2017 stated that 'the scale of the need [OAN] set out in the HEDNA is of such magnitude that it is concluded that there will be an unmet need arising in the city'. An additional letter sent on the same day to the Planning Inspector for the examination of the North West Leicestershire Local Plan set out 'our formal declaration of unmet housing need arising in the city'. The scale of the shortfall in Leicester City will be established during preparation of their Local Plan. Leicester City Council has indicated a desire to work with other local authorities within the HMA to ensure the unmet need can be accommodated within the HMA by ensuring emerging plans are flexible enough to respond to addressing such needs.

Leicester and Leicestershire Strategic Growth Plan

2. The councils within Leicester and Leicestershire, with the Leicester and Leicestershire Local Enterprise Partnership as an observer, are preparing a Leicester and Leicestershire Strategic Growth Plan. This will outline the amount and location of future growth in Leicester and Leicestershire from 2031 to 2036 and will set out broad aspirations for growth up to 2050.
3. Consultation on the Draft Plan took place from 11 January-10 May 2018. Responses are now being reviewed.
4. When completed, the Strategic Growth Plan will be a non-statutory document but will be the context for a future review of the Harborough Local Plan.

North West Leicestershire Local Plan

5. The North West Leicestershire Local Plan 2011-2031 was adopted on 21 November 2017. The Local Plan defers consideration of accommodating any unmet needs from other HMA authorities to an early review of the Plan, depending on whether, and to what extent, the future Growth Plan shows this to be necessary.
6. In his Report on the Examination of the North West Leicestershire Local Plan, the Inspector addressed issues concerning unmet housing needs and the Strategic Growth Plan. In terms of ministerial policy and national guidance, The Inspector concluded that the Plan is sound with respect to its overall housing and

employment land requirements, provided the Council is expressly committed, by adopted policy, to early review of the Plan, within a stated period after any unmet needs to be met within the district are identified.

7. North West Leicestershire District Council began a partial review of the Local Plan in February 2018.

Melton Local Plan

8. The Melton Local Plan was submitted to the Secretary of State for Examination in October 2017. Following the Examination in Public hearing sessions from 30 January to 9 February 2018, the Inspector requested Melton Borough Council to undertake consultations on the Proposed Main Modifications required to make the Plan sound. Consultation on the Main Modifications is now closed, and the Inspector's Examination Report is awaited.
9. The Main Modifications addressed review triggers, should the Strategic Growth Plan set out a scale and spatial distribution of development for the Borough which is significantly different to that set out in the Local Plan. These require an early review or partial review of the Local Plan, unless there is enough flexibility already provided for.

Revised National Planning Policy Framework

10. The revised National Planning Policy Framework was published on 24 July 2018 and sets out the government's planning policies for England and how these are expected to be applied.
11. This revised Framework replaces the previous National Planning Policy Framework published in March 2012.
12. The revised Framework introduces standardised guidance for the calculation of housing needs; a three-stage approach methodology aimed to provide consistency in practice amongst Local Authorities across England.
13. The standard method, which is set out in the accompanying NPPF Planning Practice Guidance - also known as 'objectively assessed housing need methodology' or 'OAHN' - is based on collection of Office for National Statistics data over the past 10 years, including, household projection and migration data and economic data, including median housing affordability ratios induced by market signals.
14. In its 'Government response to the draft revised [NPPF] consultation', the MHCLG advised that the standard method is likely to result in the minimum housing need numbers. For that reason, the guidance at present is still very much a work in progress pending release of new national household projections in September 2018, at which point the MHCLG will consider 'adjusting the method' to ensure that 300,000 homes are built per year by mid-2020.
15. The revised Framework also endorses joint working, like the Strategic Growth Plan, to determine where additional infrastructure is necessary, and whether

development needs that cannot be met wholly within a particular plan area could be met elsewhere.

Harborough Local Plan 2011 to 2031

16. Policy H1 provides for delivery of the housing plan requirement, plus an additional 15% contingency in the supply of housing land in order to allow for possible future circumstances affecting the supply of housing in the District, including:
 - a potential need to help meet demonstrable unmet housing need arising from other local planning authorities within the Leicester and Leicestershire Housing Market Area (HMA);
 - a slower delivery than expected on housing allocations and/or the strategic development areas;
 - housing sites gaining planning permission but not delivering completed housing in a timely manner or at the density originally proposed;
 - changing economic circumstances affecting the take-up of housing;
 - the non-delivery of housing sites due to site-specific factors; and
 - in order to provide flexibility and choice in the local housing market.
17. HSG14 Updated Housing Trajectory (31 March 2018) suggests that the Harborough Local Plan 2011 to 2031 will now deliver 12,948dw, a surplus over OAN of 1,808dw. Consequently, the contingency allowance has increased marginally to 16%.
18. Local Plan Policy IMR1 Monitoring and review of the Local Plan includes a Local Plan review trigger should the Strategic Growth Plan set out a scale and spatial distribution of development for the Harborough District which is significantly different to that set out in the Local Plan.

Conclusion

19. The Strategic Growth Plan is an appropriate method of determining and addressing the unmet needs of Leicester City. It also allows the HMA to address any impact arising from the application of the standardised guidance for the calculation of housing needs.
20. Deferring consideration of accommodating any unmet needs from other HMA authorities to an early review of the Harborough Local Plan, depending on whether, and to what extent, the future Strategic Growth Plan shows this to be necessary is sound. This approach is already being taken elsewhere in the HMA, most notably North West Leicestershire and Melton.
21. In the circumstances, the proposed housing provision set out in the Harborough Local Plan with its 16% contingency allowance is sound.