Planning Prospects Ltd (on behalf of 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. Q2.2 What are the risks to the achievement of the plan's housing delivery, in terms of infrastructure and other impediments to delivery?

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

- 1.1.1. Planning Prospects consider that the large-scale strategic allocation sites, such as the Strategic Development Areas (SDAs), have significant infrastructure requirements and research and experience suggests that sites of this nature often take a considerable amount of time to deliver.
- 1.1.2. In 2014 consultants Hourigan Connolly prepared a UK wide study on behalf of Gladman Developments in relation to the deliverability of major residential sites. The Hourigan Connolly Report¹ demonstrates the significant time involved with bringing forward development on sites of strategic scale, even where planning permission has been granted (which cannot be said of the Lutterworth East or Scraptoft North SDAs in Harborough).
- 1.1.3. The Hourigan Connolly Report considers the factors associated with bringing forward major urban extensions of 500+ dwellings in consideration of specific case studies from each of the English regions, Scotland and Wales.
- 1.1.4. The Report confirms that an average annual delivery rate of 30 35 dwellings per annum per single house builder could be realistically achievable on sites of 500+ dwellings. However, based upon its analysis of results received from Local Authorities, the study concludes that it is reasonable to suggest delivery of homes from urban extensions takes approximately 9 years from submission of an outline application, assuming there are no appeals or statutory challenges. Whilst there are instances of delivery within that timeframe, these are in the minority whereas there were many more examples of sites that take far longer to deliver houses, with many yet to deliver any houses at all. The study also includes an indicative trajectory for the delivery of major housing sites, based on the findings therein.
- 1.1.5. It is worth highlighting the following key findings of this report, namely: -
 - Average timescale for submission to grant outline planning permission is 34 months;
 - Average timescale for signing of a legal agreement is 23 months; and
 - Average timescale for reserved matters application is 6-9 months.

¹ A Report into the Delivery of Urban Extensions: on behalf of Gladman Developments Limited – Hourigan Connolly (February 2014)

- 1.1.6. With regard to the SDAs in the emerging Harborough Local Plan the recent Housing Trajectory² as at 31st March 2018 sets out that the Lutterworth East SDA will deliver homes from 2023/24, initially at a rate of 38 dpa but then incrementally rising to in excess of 200 dpa later in the Plan period. Notwithstanding there is no detailed evidence in the Council's Evidence Base to support these assumptions, this rate of delivery is very ambitious and conflicts with Hourigan Connelly's findings.
- 1.1.7. Similarly, the Scraptoft North SDA is assumed to deliver over 100 homes per annum (including in the 5 year period) which again is very ambitious and conflicts with Hourigan Connelly's findings.
- 1.1.8. The Council's latest Housing Trajectory (HSG14) shows that reliance on the Lutterworth East and Scraptoft North SDAs increases throughout the Plan period such that towards the end of the Plan period between 50 and 70% of the anticipated housing supply in the District will come from these two sites alone (see Appendix 1). This represents a heavy reliance on delivery from just two sites. If there are any delays in delivery from those two sites, as a result of delays to vital infrastructure for example, the entire emerging Plan's housing strategy is at risk of failing and the homes required in the District will not be supplied during the Plan period.
- 1.1.9. With this in mind, Planning Prospects consider that additional small to medium scale allocations should be identified in the emerging Local Plan to offer additional choice in the market and to ensure that the supply of homes in the District is boosted significantly in line with the Government's objective and as set out in the NPPF³ to ensure the emerging Plan positively prepared, justified, effective and consistent with national policy.
- 1.1.10. Notwithstanding the Council's Housing Topic Paper (TCP2) provides some comment behind the Council's assumed housing delivery rates for each SDA or allocation site at paragraphs 5.33 to 5.38, the Topic Paper references "detailed assumptions" and advice received by site promoters to justify the Council's assumptions, but none of those are actually provided (as submitted Evidence for the Examination). We would expect to see detailed supporting information in the form of common ground with the site promoters justifying the Council's delivery assumptions. This information would usually include details with regard to targets for infrastructure delivery and associated costs for example.
- 1.1.11. If the Council is going to provide new or additional evidence prior to the Examination Hearings taking place Planning Prospects will need to review and update our Assessment as necessary and reserve the right to do so.

 $^{^2\,}$ HSG14 – forming part of the emerging Local Plan Evidence Base

³ 2012 and 2018

APPENDIX 1 - SDA Delivery Trajectory

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Delivery Trajectory	Delivery Trajectory for Lutterworth East and Scraptoft North SDAs (Source: HSG14)																			
Site	Trajectory																			
	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
Lutterworth East	0	0	0	0	0	0	0	0	0	0	0	0	38	99	108	167	176	194	235	237
Scraptoft	0	0	0	0	0	0	0	0	0	0	94	108	120	120	120	140	140	140	118	100
SDA SITES TOTAL	0	0	0	0	0	0	0	0	0	0	94	108	158	219	228	307	316	334	353	337
DoH TOTAL	240	284	334	496	640	468	580	767	781	873	910	958	935	923	816	699	618	586	559	479
SDA SITES %	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	10.3	11.3	16.9	23.7	27.9	43.9	51.1	57.0	63.1	70.4