



Harborough District Local Plan Examination in Public

Hearing Statement – Matter 2 – Merton College and Leicester Diocesan Board of Finance (Rep ID 7652/7653)

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1. Introduction

- 1.1. Savills is instructed to make these representations on behalf of Merton College, Oxford and Leicester Diocesan Board of Finance in relation to their land interests to the north-east of the Kibworth Harcourt, hereafter 'the site'. The site comprises a total site area of circa 182 hectares and is capable of delivery for a strategic development area for circa 1,600 homes, employment uses, associated open space and a bypass, based on the Aspinall Verdi Residential Options Viability Interim Report (One) (April 2016).
- 1.2. Using the same numbering as in the Matters and Issues document, we set out below a response to the questions that are relevant to our case. Representations were duly submitted to the Submission version of the Local Plan dated 2 November 2017. This statement should be read in the context of those representations. The comments set out below are in addition to those in the earlier representations.

2. Discussion of Matters

Question 2.2 – What are the risks to the achievement of the plan’s housing delivery, in terms of infrastructure or other impediments to delivery?

- 2.1. Other impediments to housing delivery include whether or not there is sufficient flexibility in overall housing land supply (HLS) (see Q2.4 below).

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

- 2.2. It is not sound to rely on the headroom (+1,808 dwellings / 16%) provided by the housing land supply of 12,948 dwellings against a minimum housing requirement for Harborough of 11,140 dwellings to provide for both unmet need from Leicester and any contingency allowance for slower than anticipated delivery from allocated / committed sites, non-implementation of existing consents, economic change and choice in the housing market.
- 2.3. The experience of strategic allocations is that there is a very long lead in period before housing completions commence. The NLP Report Start to Finish (November 2016), reports that the total period for the planning approval period and subsequent time to first housing delivery increases with larger sites with the total period being in the order of 5.3-5.9 years. Reliance on only two strategic allocations reduces the robustness of the plan in the event that either of these allocations is not developed as anticipated in the local plan policies.
- 2.4. Considering the housing trajectory set out in the plan for Lutterworth East Strategic Development Area (SDA), the first completions are expected in 2022/23. The East of Lutterworth SDA proposed timetable for delivery (Rep ID 5884) lists a target date for preparing the EIA Methodology/Scoping Stage as January/February 2018 and March 2018 for the issuing of the Scoping Opinion by Harborough District Council (HDC). It can be seen on the HDC website, that the Scoping Opinion was not submitted until 29 June 2018 and is still pending consideration. There has therefore already been a delay of at least 7 months. This is likely to have knock on effects for the public consultation and consequently the submission of a planning application. The timetable is therefore already appearing to be over ambitious.
- 2.5. The timetable for post planning committee also appears to be tight. The marketing of the site and whether this is done pre or post the signing of the S106 Agreement will effect when the first phase housebuilder is on board. Six months have been given for preparing reserved matters and discharge of conditions applications including getting them improved . This appears to be extremely tight and from experience we

consider that this could take closer to 12-18 months. There are therefore are number of tasks that could lead to delays in the delivery of the site.

- 2.6. Interim Findings of the Independent Review of Build Out by Sir Oliver Letwin (June 2018) identified that the rate of build out of large sites is typically held back by a number of commercial and industrial constraints including:
- limited availability of skilled labour,
 - limited supplies of building materials,
 - limited availability of capital,
 - constrained logistics on the site,
 - the slow speed of installations by utility companies,
 - difficulties of land remediation,
 - provision of local transport infrastructure,
 - absorption sales rates of open market housing, and
 - limitations on open market housing receipts to cross subsidise affordable housing.
- 2.7. Reliance on only two strategic sites requires greater flexibility, and the Council's proposed 16% contingency is considered to be too low to provide enough flexibility to meet its own minimum housing requirement and is not sufficient to also meet the unmet needs from Leicester.
- 2.8. The advantage of not relying on two strategic allocations, is that whilst such sites are unlikely to contribute to supply in the short term such as five year supply, there is a greater likelihood of strategic allocations making a significant contribution to housing completions for the remainder of the plan period including helping to meet the unmet needs of Leicester.
- 2.9. To ensure that the plan is positively prepared and stands the best chance of meeting identified housing need, the Council should increase the contingency and consider the allocation of developable reserve sites with a suitable mechanism to allow their release during the plan period, as may be necessary.
- 2.10. This approach is recommended by the Local Plans Expert Group (LPEG) Report (March 2016) which states that local plans should "*focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF*" (para 11.4 of the LPEG Report). The Council should therefore look to increase the headroom of 16% up to at least 20% as well as allocating developable Reserve Sites.
- 2.11. Our clients' land interest which incorporates land to the north-east of Kibworth Harcourt is considered a suitable option for a possible reserve site. The site comprises a total site area of circa 182 hectares. The site is capable of delivery for a strategic development area for circa 1,600 homes, employment uses, associated open space and a bypass, based on the Aspinall Verdi Residential Options Viability Interim Report (One) (April 2016). Strategic mixed use development at Kibworth could be utilised to secure an appropriate level of developer funding towards the provision of a bypass at Kibworth which has been a longstanding aim for the Council. Our clients' land ownership is well placed to facilitate such a proposal. The inclusion of a strategic development area at Kibworth would be likely to increase significantly the

robustness of the plan to providing more flexibility and a clear contingency to assist the Council in demonstrating an adequate housing land supply in the latter half of the plan period.

Question 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 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?

- 2.12. As set out in the National Planning Policy Framework (NPPF) a fundamental outcome of compliance with the Duty to Co-operate is the delivery of full Objectively Assessed Housing Needs (OAHN) for market and affordable housing in the Housing Market Area (HMA). Any unmet need within the Leicester and Leicestershire (L&L) HMA should therefore be considered fully at this stage in order to ensure compliance with the tests of soundness provisions of the NPPF. The National Planning Policy Guidance (NPPG) states that a key element of examination is ensuring that there is sufficient certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing needs when Local Plans are adopted (ID 9-017). This approach is re-enforced by the revised NPPF 2018 (para 35c) which states that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. A Local Plan is sound if it is effective meaning that it is deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by a Statement of Common Ground.
- 2.13. An early review as proposed by the Council is not the appropriate policy mechanism by which to resolve unmet housing need because of the slow responsiveness of such reviews. The NPPF requires a five year review, an even earlier review is not feasible. The issues therefore need to be addressed now.
- 2.14. It is suggested that ahead of any early review additional flexibility is provided by a larger contingency within the overall HLS which is greater than the currently proposed 16% (see answer to Q2.4 above). The Council should consider the allocation of developable reserve sites together with an appropriate release mechanism to meet the aim of boosting the supply of housing.

Roger Smith
Head of Planning

+44 (0) 1865 269 057
+44 (0) 7967 555 603
rasmith@savills.com

Rebecca Bacon
Planner

+44 (0) 1865 269176
+44 (0) 7807 999 399
rebecca.bacon@savills.com