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# Response to Matters 1 and 2

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# 1. Matter 2: Housing Requirement and its Delivery

## 2.1 Is the uplift of 25 dpa associated with growth at Magna Park appropriate?

- 1.1. No.
- 1.2. Objective 2 of the Plan seeks to promote sustainable economic development in the District. It states the Plan will:
- “contribute to reducing the need for outcommuting and thereby help to increase the sustainability and self-containment of communities, while encouraging the development of a vibrant, diverse and sustainable business community.”*
- 1.3. To this end, it is considered the Plan should aim to accommodate at least 35% of Magna Park’s workforce within the District and apply an uplift of 55 dwellings per annum (or an additional 1,100 dwellings across the plan period) to the OAN for the District. If the OAN for the District is accepted to be 532 dpa (which we consider to be too low), an uplift of 55 dpa would mean a housing target of 587 dpa as evidenced in the Magna Park Employment Growth Sensitivity Study (August 2017) (Document HSG12).

## 2.3 Are the assumptions about delivery start dates and rates from the SDAs reasonable?

- 1.4. No.
- 1.5. The Housing Trajectory suggests that two SDAs will start to deliver new homes by 2021/22 (Scraptoft North) and 2022/23 (Lutterworth East). This is two to three years following the adoption of Plan, assuming it is adopted in 2019.
- 1.6. It is unrealistic to expect that in the next two to three years: (1) The site/parcels will be sold to housebuilder(s) to deliver (2) Development Plan Documents will be prepared and adopted; (3) Outline and Reserved Matters applications will be prepared, submitted and approved; (4) Pre-commencement conditions will be discharged; (5) necessary infrastructure will be in place and; (6) for the homes to be built and ready for occupation.
- 1.7. Consequently, the housing trajectory should be amended to reflect more realistic delivery times and additional deliverable sites should be identified to ensure that the Council can retain a rolling five year housing land supply.

**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?**

- 1.8. No.
- 1.9. It is not considered that a contingency of 1,160 dwellings is sufficient to meet Harborough's own needs, let alone meet unmet needs from Leicester City.
- 1.10. The Council is relying on three SDA's to meet its housing needs towards the end of the plan period and as noted above we do not consider the projected delivery rates for two of these realistic. Furthermore, as noted in the Council's 5 Year Housing Land Supply Report (May 2018), the Council has a record of persistent under delivery further indicating a requirement for a higher contingency buffer as the Council has clearly underperformed in the past.
- 1.11. Consequently, the proposed 15% contingency in supply of housing land to allow for possible future circumstances – which as noted at paragraph 5.1.10 of the Plan includes a potential need to help meet demonstrable unmet housing need from other local planning authorities in the HMA – is not considered sufficient.
- 1.12. Leicester City Council has declared it will not be able to accommodate its full OAN for housing within its own boundary. Whilst further evidence to determine the extent of this need is still being collated, Table 1 in the Leicester & Leicestershire Authorities Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing November 2017 indicates this is likely to be significant. Consequently, as set out at paragraph 2.9 of this statement, all authorities in the HMA agreed it is 'necessary to include provision to accommodate unmet need' within the HMA as a whole.
- 1.13. In its response to the Pre-Submission Local Plan, Leicester City Council welcomed reference in Harborough's Plan to meeting housing needs of the HMA (paragraph 5.1.10). However, it went on to request that the Plan go further to meeting the City's unmet housing need (e.g. by setting aside a specific amount housing land to meet its unmet need, in advance of full HMA wide agreement on housing distribution).
- 1.14. In accordance with paragraph 159 of the NPPF, 'local planning authorities should have a clear understanding of housing need in their area.' This is further clarified at Paragraph: 003 Reference ID: 2a-003-20140306 of the PPG which defines need for housing in the context of the housing market area over the plan period. Thus, until the amount of unmet need in Leicester City is known, Harborough District Council cannot demonstrate 'a clear understanding of housing needs in their area' contrary to national policy.
- 1.15. Furthermore, as Harborough has indicated it will meet some of Leicester's unmet need, it is also arguable that it has failed in its Duty to Co-operate. In the interests of transparency and co-operation as a continuous process, Harborough District Council should clearly set out how it intends to help meet Leicester City's needs in order to produce effective and deliverable policies on strategic cross boundary matters in accordance with PPG 2014 Paragraph: 001 ID:9-001-20140306.

1.16. This Local Plan is not accompanied by an up to date Memorandum of Understanding between the local authorities in the HMA. It is noted at paragraph 4.8 of Harborough's Duty to Co-operate Statement that a 'final MoU' which sets out the OAN and the agreed distribution of any unmet housing need to 2031 will be prepared. Until this is prepared, the Council has not fulfilled the requirements of the Duty to Co-operate.

**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?**

1.17. The housing requirement for the calculation of the 5 year supply should be increased now in order to allow for a proportion of unmet need for Leicester.

1.18. If Harborough is to help meet some of Leicester's unmet need, as it has indicated it will, the specific amount of housing to meet this need should be identified now and a sufficient number of housing sites to meet this identified need, in addition to Harborough's own needs, should be identified now. Consequently, as the responsibility to deliver these homes will fall upon Harborough, this requirement should be incorporated into the District's five year supply calculation.

1.19. It is not appropriate to rely on the proposed trigger for a Local Plan review in Policy IMR1. Local Plan reviews are time consuming and it can take a number of years for revised plans/policies to be adopted, particularly where the topic of housing need and delivery is concerned. The inability of Leicester City to meet its own housing needs has been known since the beginning of the Charnwood Core Strategy Examination in March 2014 and the publication of the 2014 SHMA, and further delays to meeting this need will only further exasperate housing shortages in the City.

1.20. Paragraph 47 of the NPPF requires local planning authorities to 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for the housing market area'. Until the unmet need in Leicester City is confirmed, and the distribution of need agreed between all the authorities in the HMA, as currently drafted this Plan does fulfil the requirements of paragraph 47.