



## **HARBOROUGH LOCAL PLAN 2011-31 EXAMINATION**

### **HEARING STATEMENT – MATTER 3**

On behalf of:  
**Manor Oak Homes**

**Respondent ID: 7562**

Date:  
**September 2018**

Reference:  
**LR/00915/LP Examination Matter 2**



## 1.0 Introduction

1.1 This statement is prepared on behalf of Manor Oak Homes in relation to Matter 2: Five Year Housing Land Supply. Under this matter, the Inspector asks the following three questions, which we respond to in turn below:

3.1 What is the current 5 year housing land supply position?

3.2 Is the methodological basis for calculating the 5 year housing land supply sound?

3.3 Is the plan resilient and flexible enough to maintain 5 or more years' supply of deliverable housing land going forward?

## 2.0 What is the Current 5 Year Housing Land Supply Position? Is the Methodological Basis for Calculating the 5 Year Housing Land Supply Sound?

2.1 Questions 3.1 and 3.2 posed by the Inspector are inextricably linked, and therefore, we deal with them together.

2.2 The Council has in recent months published two 5 year supply assessments, these being in May and August 2018. The May 2018 assessment calculates the supply against the identified Objectively Assessed Need (OAN) figure of 10,640 dwellings between 2011 and 2031 or 532 dwellings per annum (dpa) and applies the Sedgfield method to shortfall and a 20% buffer. It identifies a supply of 4.92 years. Having regard to paragraph 73 of the new NPPF, the August 2018 assessment calculates the supply based upon the local housing need figure of 542dpa, applies a 5% buffer and makes no provision for historical shortfall. It identifies a supply of 6.94 years.

2.3 We understand from the policy team at Harborough District Council that so far as the emerging local plan, and more specifically, the proposed housing requirement is subject to outstanding objections and the adopted strategic policies (Harborough Core Strategy 2006-2028) are more than 5 years old, the Council will be relying on the August assessment until such a time as the new local plan has been adopted. Curiously though, we understand that for the purposes of answering Question 3.3 the Council intend to use the May 2018 assessment.

2.4 The circumstances surrounding the Harborough Local Plan and the nature of outstanding objections are such that the outcome of the local plan examination is unlikely to be one where the housing requirement is reduced. This, and the Council's intention to revert back to using the local plan housing requirement when the local plan is adopted, point to the Council's decision to use a paragraph 73 based approach that enables the demonstration of a 5 year supply for the determination of planning

applications until such a time as the Plan is adopted, to be an opportunistic means of maximising its supply and defending itself against current planning applications.

2.5 Manor Oak Homes accept that paragraph 73 of the new NPPF gives local planning authorities the option of undertaking such assessments against either their housing requirement set out in adopted strategic policies or their local housing need where the strategic policies are more than five years old. However, the purpose of 5 year land supply assessments is to monitor and ensure the rolling provision of housing over plan periods in accordance with the set housing requirement, and as we understand it, the purpose of the Inspector's question, is to establish whether the proposed plan strategy and the assumptions upon which it is based would enable the maintenance of a rolling 5 year supply. Accordingly, for the purposes of this Examination, Manor Oak Homes consider that the approach to assessing 5 year supply should be one based upon the emerging Plan so that the soundness of the strategy may be properly assessed. Under this approach, the Council is currently unable to demonstrate a 5 year supply of deliverable housing land.

2.6 Although Manor Oak Homes consider that the calculation of the 5 year supply should be based upon the emerging local plan requirement, they do not consider the methodology followed in the May 2018 assessment is sound as it is based upon the OAN and not the total requirement being pursued by the local plan. Indeed, it does not include any provision for the contingency that has been identified as necessary to respond to unforeseen circumstances over the plan period. Having been identified as necessary to ensure the Plan contains sufficiently flexibility to ensure it delivers the housing requirement, it should be factored into any 5 year supply assessment.

### **3.0 Is the Plan Resilient and Flexible Enough to Maintain 5 or More Years' Supply of Deliverable Housing Land Going Forward?**

3.1 As set out in relation to Matter 3, Manor Oak Homes consider that:

- The proposed housing requirement makes insufficient provision for any shortfall from Leicester;
- The housing trajectory makes overly optimistic assumptions regarding the delivery of the Scraftoft and East Lutterworth Sustainable Development Areas; and
- The identified supply and proposed spatial strategy is insufficient to meet identified need and promote sustainable development over the plan period.

3.2 In this context, the Plan as drafted is not resilient or flexible enough to maintain 5 or more years' supply and that given the need expected to arise from Leicester and the anticipated under supply at the SDAs there is likely to be a shortfall during the plan period. It cannot therefore be considered to be positively prepared or justified.