

## **Examination of Harborough Local Plan 2011 to 2031**

### **Statement on behalf of Bloor Homes Ltd**

### **Submitted by Define Planning & Design Ltd**

#### **Matter 3 – Five Year Housing Land Supply**

##### **Q3.1 & Q3.2: 5 Year Land Supply Position & Methodology**

1. It is understood that this Local Plan is being prepared in the context of the 2012 NPPF. However, planning applications now have to be determined in the context of the 2018 NPPF. Indeed, the District Council have already taken to the opportunity to “update” their 5 Year Land Supply Position Statement in that light. The methodological changes in the new NPPF, notably the application of only a 5% buffer, now means that the District Council believe they have a 6.94 year supply.
2. However, it is apparent that the District Council have not yet reviewed their purported land supply in light of the 2018 NPPF’s new definition of “deliverable” (page 66). There is no longer a presumption that sites with the benefit of a Local Plan allocation or even an outline planning permission will deliver housing within 5 years. The onus is now on there being clear evidence that housing completions will begin within 5 years, and the burden of proof lies with the District Council. The change in definition is a clear recognition that these sites can and often do take longer than 5 years to deliver.
3. Consequently, the District Council should only includes sites that are not major development or have the benefit of a detailed planning permission in their 5 year land supply calculation unless they can present clear evidence on a site by site basis that housing completions will being within 5 years.
4. The true 5 year land supply position in the District is, therefore, substantially less than the District Council currently claim.

##### **Q3.3: Maintenance of a 5 Year Land Supply**

5. The maintenance of a 5 year land supply through the plan period is very much dependent on the delivery of both the Lutterworth East and Scraftoft North Strategic Development Areas (SDAs) as assumed in the housing trajectory. The revised housing trajectory set out in HSG14 highlights that for much of the remaining plan period those 2 sites alone will be providing over 50% of the annual housing delivery expected in the District. Clearly, therefore, a delay to one or both of them coming forward and/or lower than anticipated annual delivery rates will fundamentally undermine the 5 year land supply position in the District. Given the concerns relating to the delivery of the SDAs highlighted in the written statement submitted on Bloor Homes behalf in relation to Matter 2, it is apparent that there is currently great risk ingrained into the Local Plan in this respect.
6. The Local Plan is, therefore, currently unsound in terms of its effectiveness and compliance with the NPPF, and that can only be remedied by the allocation of a “portfolio” of deliverable development sites based on the settlement hierarchy that underpins spatial development strategy. There is, therefore, a need to identify and allocate a number and variety of additional

sustainable development sites over and above those already identified in the Local Plan, and the PUA should be the first location that is considered (see also Bloor Homes Statement in relation to Matter 6 in this respect). The Local Plan will then properly reflect the presumption in favour of sustainable development as set out in paragraph 14 of the NPPF by ensuring that there is sufficient flexibility in the spatial development strategy to positively seek opportunities to meet the development needs of the area and to adapt to rapid change.