

# Harborough Local Plan Examination

## Written Statement Matter 3

Prepared for:

Client: David Wilson Homes

Property: Land at Burnmill Farm, Market Harborough

Date: September 2018

# INTRODUCTION 1.

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- 1.1. This Position Statement has been prepared by Fisher German on behalf of David Wilson Homes in respect of its land interests Burnmill Farm, Market Harborough (Policy MH3: Burnmill Farm).
- 1.2. The site is the subject of a Full Planning application for the residential development of the site for 128 dwellings. The application (17/02020/FUL) was made in November 2017 and is anticipated to be reported to Planning Committee in September 2018. An update on the planning application will be provided to the Inspector ahead of the Hearing Sessions commencing.

## MATTER 3: 2. Five year housing land supply

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

- 2.1. It is noted that the Council has recently updated its housing land supply position (17<sup>th</sup> August 2018). The updated supply is calculated on the basis of an Annual Local Housing Need of 542 dpa (derived having regard to the Standardised Methodology) and, utilising a buffer of 5%. The calculation proposes a 6.94 year supply.
- 2.2. To correctly calculate Harborough's Housing Land Supply Position through the Local Plan examination it must be tested against the Local Plans Housing Requirement, not the Standardised Methodology as per the Authorities most recent Five-Year Housing Land Supply statement.
- 2.3. Paragraph 5.1.4 of the Submission Local Plan confirms that the housing requirement for Harborough District is 557 dwellings per annum.
- 2.4. To calculate the current housing land supply, it is first necessary to calculate whether there has been any undersupply in the early years of the plan period (2011 – 2017). Appendix D: Housing Trajectory and most recent five-year land supply report states that 3038 dwellings were built in the opening years of the plan period. This is against a target of 3,899 dwellings (557 x 7). This equates to a significant shortfall of 861 dwellings. As there are clear signs of housing uplift within the Borough in recent years, there is no reason to suggest use of the 'Liverpool method' and as such the NPPG preferred 'Sedgefield method' should be used. This involves the delivery of the housing shortfall within the first five years of the plan.
- 2.5. Footnote 39 of the revised Framework indicates that from November 2018, the test on whether an Authority should apply the 20% buffer should be derived from the Housing Delivery Test. It explains that the 20% buffer will be applicable if "*delivery was below 85% of the housing requirement*". We consider that given the likely timescales to adoption of the Plan, and the recent delivery rates, that the Council will not need to utilise a 20% buffer. We would however disagree that this means the Council should use a 5% buffer. Instead, in the interests of positive planning the Council should utilise the provisions of the revised NPPF Paragraph 73 and use a 10% buffer to demonstrate an annual position. This would provide certainty for the year after adoption and support more closely the Government objective of boosting significantly the supply of housing. We calculate, against the Authorities claimed supply in the most recent Five-Year Land Supply Document, that the Council can demonstrate a marginal supply of 5.15 years against a 5% buffer. Against a 10% buffer, the Council can demonstrate 4.92 years. This is before any consideration of potential delivery issues or reduction in assumptions through this examination.
- 2.6. In calculating the five year supply we consider it necessary and appropriate that our clients land at Burnmill Farm (MH3; Burnmill Farm) should be included within the supply. Whilst the site is identified in the Trajectory, submitted with the Plan (HSG14) (March 2018) with delivery commencing in 2020/2021, the more recent Five-Year Land Supply Statement (August 2018) excludes the site. As detailed in response to Matter 8, the land at Burnmill Farm, is currently the subject of a Full Planning Application, and is expected to be reported to Planning Committee in September 2018. David Wilson Homes are

committed to the delivery of the site and subject to Members resolving to grant planning permission, the following housing delivery is expected:

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
		34	34	34	25

**Table 1: Burnmill Farm Trajectory**

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

- 2.7. The most recently published Five-Year Housing Supply Statement (17<sup>th</sup> August 2018) is flawed, in that it does not use the correct figure for the housing requirement, nor does it address previous under-delivery. As detailed above, the five year housing land supply should use the housing requirement contained within the emerging Plan. Should that change through the process of the examination, then it should be updated for the purposes of calculating five-year supply. Moreover, in line with the NPPG, the Council should look to meet its established shortfall in the first five years of the plan.

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

- 2.8. For the reasons given in response to Matter 2 in respect of the delivery of the SDAs and being able to immediately respond to any unmet need, it is considered that the Plan is not resilient or flexible enough to maintain a 5YHLS in the future.
- 2.9. Ahead of any early review (if indeed the Inspector accepts the Council's proposal for this) an increased contingency, significantly above that currently proposed, in the overall HLS should be provided by the allocation of more housing sites, and reflection of increased numbers on sites such as Burnmill Farm (as set out in Matter 8). This approach would ensure the resilience and flexibility of the Plan.