

---

# Hearing Statement on behalf of Jelson Ltd

## Harborough District Local Plan

### Examination

Matter 3: Five year housing land supply

September 2018

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

1. The Council's latest "5 Year Housing Land Supply" (5YHLS) Position Statement (16 May 2018) states that it can demonstrate a supply of 4.92 years between 1 April 2018 and 31 March 2023.
2. However, we note that this has been calculated on an annual housing requirement of 532 dwellings per annum (dpa).
3. The draft Local Plan proposes an overall housing requirement of 557 dpa. The current 5YHLS position must be calculated on this basis.
4. Table C within the Council's latest 5YHLS Position Statement (May 2018) demonstrates how the supply has been calculated. We have supplemented this table with an additional column that calculates the Council's supply based upon (i) 557 dpa and (ii) a five year supply of deliverable sites of 4,289 (figure taken from the Housing Trajectory in HSG14) between 2018/19 and 2022/23. Despite the increased supply of deliverable sites, we have established that the Council cannot demonstrate a 5YHLS (4.907 years). Our analysis of the Council's housing land supply is shown in an amended table which is appended to this Statement (Matter 3, Appendix I).
5. The calculation of 4.907 years is based on the assumption that the Scraftoft North SDA will deliver 202 homes within this five year period. In Matter 2, (question 2.3, assumptions about delivery start dates and rates for the SDAs) we have explained that it is unreasonable to assume that this SDA would deliver within the first 5 years following adoption. Pushing the delivery of this SDA back would further reduce the Council's 5YHLS position (to 4.68 years).
6. It is clear that the Council will not be able to demonstrate a 5 year housing land supply on adoption of the Local Plan. Accordingly, in its current form the draft Local Plan is unsound.

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

1. The methodological basis for calculating the 5 year housing land supply appears to be sound.
2. The Authority has a shortfall of 682 homes between 2011/12 and 2017/18. To address this shortfall, it has chosen to adopt the Sedgefield approach, adding the shortfall to the requirement over the next 5 years.
3. Moreover, the Authority has chosen to add a 20% buffer to its calculations due to persistent under delivery. We consider this to be appropriate as the Authority has under delivered (significantly in some) for five of the last seven years.
4. However, we have noted that the Authority intends to apply a 5% buffer from 2018/19 onwards, which is the expected year of adoption (paragraph 5.1.9 of the dLP). On the assumption that the Authority delivers all of its projected numbers for 2018/19 (767 units), it will only have over delivered for two successive years. Over eight years, it will have over delivered in only three of those. This is not evidence of an Authority that has consistency over delivered.
5. We contend that, following the adoption of the draft Local Plan, the Authority must continue to apply a 20% buffer to its 5 year housing land supply calculations until it has consistently over delivered for a number of years.

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

1. A requirement of the NPPF (2012) is for local planning authorities to "*boost significantly the supply of housing*" (paragraph 47). With specific regard to this matter, the Framework requires authorities to:
  - (i) "*identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land*"; and
  - (ii) "*for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target*".
2. The Council has produced an updated housing trajectory (HSG14) as at 31 March 2018.
3. However, the Council has not produced any evidence to demonstrate that it can maintain delivery of a five year supply of housing land throughout the plan period.
4. In more general terms, our Client has concerns that the Plan is extremely dependent on large scale SDAs to deliver its residual housing requirement. The SDAs at Scraftoft and Lutterworth would deliver around 58% of the Council's residual requirement over the Plan period. Should one, or both, of these SDAs encounter delays or fail to deliver at the expected rates, there is insufficient flexibility in the Plan to maintain a five year housing land supply.
5. To resolve this matter, the Authority should identify a portfolio of small and medium sized 'reserve sites', adjacent to the District's most sustainable settlements, which can deliver housing developments of between 50 and 200 units. Developments of this size are more likely to deliver housing in the short term.

# Appendix I

## GVA Amended Version Table C

# Harborough District Council - 5 Year Housing Land Supply Calculation

01 April 2018 to 31 March 2023

Housing Requirements	Row	Total 532 dpa	Total 557dpa	Calculation
Strategic Housing Requirements for Harborough District 2011-2031	A	10,640	11,140	n/a
Annual Housing Requirement	B	532	557	A / 20 years
Housing Requirement to date (1 Apr 2011- 31 March 2018)	C	3,724	3,899	B x 7 years
Recorded housing completions 1 Apr 2011 to 31 March 2018	D	3,042	3,042	n/a
Shortfall to add to the next 5 years requirement	E	682	857	C - D
Shortfall as an annual requirement for the next 5 years	F	136	171	E / 5 years
Total Annual requirement for the next 5 years	G	668	728	B + F
Additional 20% Buffer	H	134	146	G x 0.20
Total Annual Requirement for the next 5 years, including buffer	I	802	874	G + H
<b>Total Five Year Housing Requirement</b>	<b>J</b>	<b>4,010</b>	<b>4,370</b>	<b>I x 5 years</b>
Supply of Sites: 1 October 2017 to 30 September 2022	Row	Total		Calculation
Projected delivery from Allocated sites with permission (See Appendix 3, Table 1.)	K	38		n/a
Projected delivery from Market Harborough SDA (See Appendix 3, Table 2.)	L	446		n/a
Projected delivery from large sites with planning permission (See Appendix 3, Table 3.)	M	2,251		n/a
Projected delivery from Neighbourhood Plan Allocated Sites (see Appendix 3, Table 4.)	N	655		n/a
Projected delivery from sites with planning permission, pending a Section 106 Agreement	O	157		n/a
Projected delivery from small sites with planning permission (Sites under construction and unimplemented, see Appendix 4)	P	327		n/a
Windfall allowance (See Appendix 5.)	Q	75		n/a
<b>Five Year Supply of deliverable sites</b>	<b>R</b>	<b>3,949</b>	<b>4,289</b>	<b>K + L + M + N + O + P + Q</b>
Five Year Assessment calculation: 1 October 2017 to 30	Row	Total		Calculation
Annual requirement plus 20% buffer	S	802	874	I
Assessed Five Year Supply of Deliverable Dwellings	T	3,949	4,289	R
Supply of Land as a percentage of the requirement	U	98%	98%	R / J
<b>Years Supply of Land (years)</b>	<b>V</b>	<b>4.92</b>	<b>4.907</b>	<b>R / I</b>

Table C – Harborough District Council 5 Year Housing Land Supply