

**EXAMINATION OF HARBOROUGH LOCAL PLAN**  
**MATTER 3 – FIVE YEAR HOUSING LAND SUPPLY**

**Inspector's issues and questions in bold type.**

This Hearing Statement is made for and on behalf of the HBF which should be read in conjunction with our representations to the pre-submission Local Plan consultation dated 3<sup>rd</sup> November 2017. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document dated 15<sup>th</sup> August 2018.

**3.1 What is the current 5 YHLS position?**

An updated 5 YHLS position (as at 31 March 2018) should be calculated by the Council for discussion at the Examination Hearing Session. On the basis of data set out in Document HSG14 Updated Housing Trajectory as at 31<sup>st</sup> March 2018 the HBF estimate the Council's 5 YHLS position as :-

- Housing requirement of 557 dwellings per annum (dpa) x 5 years = 2,785 dwellings ;
- Plus shortfall of 857 dwellings which occurred between 2011/12 – 2017/18 (557 dpa x 7 years = 3,899 less actual completions of 3,042 dwellings) = 3,642 dwellings ;
- Plus 20% buffer of 728 dwellings for persistent under delivery = 4,370 dwellings (874 dpa).
- Projected HLS of 4,289 dwellings = 4.9 years (4,289 divided by 874 dpa).

This illustrative estimation is based on no adjustments to the Council's own assumptions on lead-in times, lapse rates and / or delivery rates. If any assumptions are incorrect then the Council's 5 YHLS will reduce below 4.9 years. If during the Examination the Council cannot demonstrate a 5 YHLS on adoption of the Local Plan then the Plan cannot be found sound.

**3.2 Is the methodology basis for calculating the 5 YHLS sound?**

The Council's methodology basis for calculating the 5 YHLS as set out in 5 YHLS Report (as at 31 March 2017) dated July 2017 is not sound. The Council's calculation uses the OAHN figure of 532 dwellings per annum rather than the housing requirement of 557 dwellings per annum which is incorrect.

The 5 YHLS should be calculated on :-

- the annualised housing requirement as set out in the NPPF (para 47) ;

- plus any accrued shortfalls from the start of the plan period (2011/12 – 2017/18) in accordance with the NPPG (ID 03-035) commonly known as the Sedgefield approach and ;
- in the case of Harborough a 20% buffer for persistent under delivery as set out in the NPPF applied to both the annualised housing requirement and the shortfall (as established in numerous Local Plan Examination Inspector’s Final Reports).

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

Currently the Council cannot demonstrate a 5 YHLS on adoption of the Local Plan. The Plan itself is not resilient and flexible enough to maintain a 5 YHLS in the future.

Ahead of any early review as proposed by the Council in Policy IMR1 an increased contingency (above the currently proposed 16%) in the overall HLS should be provided by the allocation of more housing sites (see HBF answer to Matter 2 Q2.4). An early review is not the optimum policy mechanism by which to provide resilience and flexibility because of the slow response time of such reviews. The Council should also consider the allocation of developable reserve sites together with an appropriate release mechanism as recommended by the LPEG Report. The LPEG Report proposed that *“the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF”* (para 11.4 of the LPEG Report).