

P22-3323

M Bills Neighbourhood and Green Spaces Officer C/O Harborough District Council The Symington Building Adam & Eve Street Market Harborough Leicestershire **LE16 7AG**

12th September 2025

Dear Mr Bills

Houghton on the Hill Neighbourhood Plan

I write further to our recent correspondence relating to the additional information produced by Harborough District Council, the day after the Regulation 16 consultation period closed. I note that you have indicated that the Council is unwilling to ask the Examiner if he would be willing to receive additional correspondence relating to that new evidence. Nonetheless, having reviewed it, I submit this letter with a further request for this to be forwarded to the Examiner for consideration.

Information Received

Further to an Fol request related to the background of the Housing Need figure Harborough District Council furnished me with a series emails and Notes of Presentation, the earliest correspondence is dated 7th March 2023 and the latest 13th May 2025. The bundle of correspondence is attached to this letter (as received in pdf format).

Commentary

As you will be aware, my client's representations to the Neighbourhood Plan, raise concerns that the incorrect Local Housing Need figure has been used in the production of the Neighbourhood Plan. The Housing Need figure should have been based on the current Standard Method.

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Noting the reluctance to accept any additional commentary, I will avoid a detailed rehearsal of the information contained in the released documents. Suffice to say that they support my client's representation and understanding of the facts. That is, that the Neighbourhood Plan's housing need figure, provided by the Council, has not been produced with regard to the latest evidence of Local Housing Need (ie the current Standard Methodology). It is therefore produced contrary to requirement of the 2024 NPPF §28, which requires such a figure should take account of the latest evidence of housing need, ie the Standard Methodology.

This is evident in bundle correspondence dated 12/06/24, which confirms that reliance was being placed on the emerging Local Plan requirement (which is being prepared under the previous 2023 NPPF) and is not therefore reflective of the latest Local Housing Need figure which the Neighbourhood Plan is required to meet. This was further confirmed by reference within correspondence dated August 19th 2024, which was asking whether there "Are sufficient allocations to meet the Local Plan requirements to 2040/41. The plan provides for about 100dw...." Again, the emerging Local Plan is not based on the current Standard Methodology, which the Neighbourhood Plan needs to have regard to.

There is an absence of recognition through the 2025 correspondence, that the Neighbourhood Plan is coming forward under a different NPPF from the Local Plan, that the Neighbourhood Plan should be reflecting the current Standard Methodology (not the historic one, which is has a materially reduced figure), and that the Neighbourhood Plan has an obligation to reflect the higher Local Housing Need.

I would be grateful, if these observations, and new evidence, could now be placed before the Examiner.

Yours sincerely

Keith Fenwick

Executive Director