

Name of Consultee	Comments	Officer Comments and Actions
1. Mr M G Norton	<p>1/ Need to build more affordable housing. Mr Norton has nominated his land for this.</p> <p>2/ Need to ensure safe and secure housing areas in future supply.</p> <p>3/ Need to develop more houses in Smeeton and reduce development in Kibworth.</p>	<p>Affordable housing is dealt with on a site by site basis in line with the adopted Supplementary Planning Document (February 2006). These comments are not deemed relevant to this report.</p> <p>Comment is noted however it is not deemed relevant to this report.</p> <p>Future Allocations will be considered in the Housing and Employment Allocations DPD. Other developments will be considered by the Development Control team on a site by site basis.</p>
2. Mr Mason	The Scotland Road Site should have 46 units not 37	The Scotland Road site does have 46 units in total however 9 of these were completed in the 2005/06 housing year. As a result only the remaining 37 are included in the future projections.
3. Purnima Wilkinson – East Midlands Housing	<p>1/ Could you clarify how the housing trajectories will be affected / influenced by the revised RSS.</p> <p>2/ How will future studies such as the Leicestershire Housing Market Assessment and The Leicestershire Growth Agenda Bid affect housing supply in the District and what impact will this have on the report in the future?</p>	<p>At the time of production the revised RSS figures were not publicly available. As this information paper provides a review of the 2005/06 housing year and will be adopted and used as a material consideration it was deemed appropriate to include trajectory for adopted figures. Now these figures are publicly available housing trajectory will be considered to 2026 in the forthcoming AMR.</p> <p>The Information Paper sets out an expected supply and compares this supply against adopted housing figures. If and when new housing figures were to be adopted or published the housing trajectory will be adjusted accordingly. It is understood that the Housing Market Assessment and the Growth Point Bid will feed into the RSS revision. It is envisaged that housing trajectory</p>

	<p>The document does not delineate between urban and rural areas as part of the trajectory.</p> <p>It would be helpful to identify which settlements are included within the CLPA and which within the Rest of District.</p>	<p>inline with RSS to 2026 will be included in the AMR.</p> <p>As a predominantly rural District it is not seen as necessary to delineate between urban and rural areas. The District is divided into the CLPA and Rest of District through policy set out in the adopted Leicester, Leicestershire and Rutland Structure Plan, which explains its inclusion in the document. Developments in individual settlements are included in Annex A, which helps identify the broad location of larger developments in Harborough District.</p> <p>Comment is noted and this will be incorporated into the final report. The settlements within the CLPA are identified on page 2 of the main Paper. All other settlements are within the Rest of District.</p>
4. Steven Austin – Network Rail	No comments to make	N/A
5. Stewart Bradshaw – Leicestershire Constabulary	No comments to make although report will be kept to monitor the growth of settlements and relative policing requirements.	N/A
6. Ann Plackett – English Heritage	No comments to make	N/A
7. Sophie Davies – Leicestershire County Council	No comments to make	N/A
8. Angela Lomas – Loughton Planning Subcommittee	No specific comment although concern was expressed regarding the number of houses due to be built	Comments noted
9. William Davis Ltd	By using the 2001 completion figure of 699 the average over the last 5 years is distorted. If this figure is not used the average annual completions would be much lower.	This comment is noted; however the PPS12 Good Practice Guide recommends the use of the previous 5 years figures or figures to the start of the plan period. As the year 2001/02 is the start of the adopted RSS the 2001/02 housing completion figure has been used. The

	<p>There is a substantial difference between the actual average completions on UCS (56) and the one projected in the report (161) this would suggest expected development on brownfield in the future is greatly over estimated</p> <p>The UCS also considers many smaller settlements that may contribute brownfield development however the sequential approach in the Core Strategy and the emerging RSS suggest some of these settlements will not be considered due to sustainability issues. This would suggest a lowering of expected completions is needed.</p> <p>The use of UCS figure to 2021 is not supported by evidence and there is a failure to acknowledge that recent completions on UCS have been low despite high levels of commitments.</p> <p>Emerging government guidance requires the use of a longer time frame than the 10 years identified for the Structure Plan.</p> <p>The advice also identifies that provision should be made by way of allocations, with reliance on windfalls only where it is not possible to allocate land and where</p>	<p>same average has been used for the structure plan period to eliminate the higher completion levels between 1996 and 2001 which would have distorted the figure even more.</p> <p>In light of this comment and others of similar nature the UCS figures have been reviewed and calculated to reflect past completions and existing commitments. Our new windfall projections suggest this type of development has not been greatly over estimated</p> <p>All smaller settlements not included in the settlement hierarchy (as outlined in the emerging Core Strategy for Harborough District) have been removed and discounted to provide a more conservative and sustainable approach to future brownfield development.</p> <p>This comment is noted and as a result UCS projections after 2016 have been removed from the housing trajectory.</p> <p>This comment is noted hence a trajectory to 2021 has been produced to take account of a 15 year supply as required by draft PPS3. The Good Practice Guide to PPS12 however does suggest that projections should be made for a 10 year period or the remainder of the plan, whichever is longer. By producing both trajectories we have taken account of both adopted and emerging guidance.</p> <p>It is appreciated that this comment is valid in light of draft PPS3, however our existing commitments and past completion rates suggest that there is a steady supply of</p>
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	<p>SA indicates that allocating land is unsustainable</p> <p>In light of an over estimation on brownfield sites the surplus over the RSS timeframe is expected to be far greater than mentioned in the report.</p>	<p>completions on brownfield windfall sites. As a result it is deemed necessary and appropriate to build these projections into the housing trajectories. An additional section has been added to the report to consider the release of the remaining Local Plan Allocation and therefore take account of greenfield development within Harborough District.</p> <p>As mentioned previously an over estimation on brownfield completions is not considered as pivotal as first thought, in light of more robust calculations and review. It is expected that there is a relatively high surplus within the RSS timeframe, however it is not expected to have an impact in terms of releasing housing land for greenfield development for some years.</p>
<p>10. Hanna Mawson - HBF</p>	<p>Concerned by the under provision of houses over the 2001-2021 housing year. Recent sub regional household projections (ODPM – March 2006) suggest an average of 500 dwellings a year need to be built, far more than is expected to be met within Harborough.</p>	<p>When drawing the housing trajectory for the whole District against the targets of the Adopted RSS to 2021 it is clear that a cumulative shortfall is not experienced within Harborough until the year 2015/16. The Councils projected performance against the Draft RSS figures will be included in the AMR</p>
<p>11. Pegasus – Persimmon Homes and Stamford Homes</p>	<p>The document should focus primarily on the RSS8 period as this is currently the most relevant. It should also focus on the emerging RSS figures to assist in the production of LDF documents.</p> <p>An additional table outlining brownfield windfall completions over the plan period would assist in</p>	<p>The report uses figures from the RSS based on advice from the inspector report for MH/3, however figures for the Structure Plan are also used as this document publishes adopted figures for the District not just the County and are therefore formally relevant to Harborough not just an assumption. By using both a firm balance is achieved between adopted and emerging policy.</p> <p>This comment is noted and this section will be included in the report to assist in a more thorough projection of</p>

	<p>generating future forecasts for urban capacity/windfall supply</p> <p>The UCS should be updated and reviewed to reflect the current situation</p> <p>More explanation regarding calculations in figure 5 should be given</p> <p>In light of government guidance the UCS mid point should not be used as emerging guidance suggests more reliance should be placed on allocating sites.</p> <p>It should be expected that as the number of possible UCS sites become available and geographical constraints increase on remaining sites there will be a decline on UCS completions and the housing trajectory should reflect this.</p> <p>As the actual completion figures are well below the expected completions for the 1st 3 years on the UCS further justification for using the lower identified figure is given.</p> <p>Windfall completions on UCS sites after 2016 should be as conservative as possible so undue reliance is not placed on windfall sites coming forward</p> <p>The graphs used in the trajectory sections are generally unhelpful as they do not make easy reading. More reference should be made to the tables in the annex. The section should also begin with reference to the requirements set out in each document.</p>	<p>windfall completions.</p> <p>In light of consultation comments we have attempted to review our urban capacity figures, paying specific focus on past completions and existing commitments in an attempt to make figures more robust and conservative. A full review of the UCS to 2021 and 2026 is currently being considered.</p> <p>The mid point has now been discarded and instead the lower figure has been used to ensure UCS projections are as conservative as possible and reflective of past completions and existing commitments</p> <p>The review of the UCS figures has reflected this decline in completions.</p> <p>This comment is noted and the lower figure has now been implemented in future projections.</p> <p>This comment is noted and the lower figure has now been implemented in future projections to ensure a more conservative approach.</p> <p>This comment is noted and more reference will be made to the tables. The graphs are simply in place to portray a pictorial representation of the plan period. Reference to the plan requirements will also be introduced</p>
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	<p>There is some concern that large windfall sites may not be developed in the periods stated</p>	<p>By discussing these sites with senior Council officers and the developers themselves the Council has attempted to be as robust in these predictions as possible. However it is accepted that mitigating circumstances may occur to alter these planned development rates. However it is deemed essential to the role of the housing trajectory to include all large sites that have planning permission.</p>
<p>12. Pegasus – David Wilson Homes</p>	<p>Pleased that the report has been published and reference is made to the 2 inspectors reports for Kibworth and MH. However reference should also be made to the p9 of the inspector’s letter for MH in which he states the RSS period is the preferred timescale for monitoring not the structure plan.</p> <p>Reference should also be made to the emerging RSS figures in the future but this report should just be the adopted RSS.</p> <p>In the small site allowance section reference should be made to whether these figures are net or gross</p> <p>In UCS section it should be made clear how the figures have been derived and should ensure that small sites are removed to avoid double counting</p> <p>It should be expected that as the number of possible UCS sites become available and geographical constraints increase on remaining sites there will be a decline on UCS completions and the housing trajectory should reflect this.</p>	<p>Comment is noted and this will be introduced into the report.</p> <p>The emerging RSS will be considered in the AMR and will also form an integral part of future housing land availability papers.</p> <p>Comment is noted, but all figures are net, in line with PPS 12 recommendations for housing trajectory.</p> <p>The UCS section has been reviewed in light of comments and it is hoped a more through explanation of how the figures were compiled is included in the report. It has also been ensured that small sites have been removed to avoid double counting.</p> <p>The review of the UCS figures has reflected this decline in completions.</p>

	<p>As the actual completion figures are well below the expected completions for the 1st 3 years on the UCS further justification for using the lower identified figure is given.</p> <p>Windfall completions on UCS sites after 2016 should be as conservative as possible so undue reliance is not placed on windfall sites coming forward</p> <p>Farndon Road site has now been reduced to 660 dwellings instead of 760, however the annual delivery rate has not changed. The Kibworth site will deliver 659 dwellings instead of 626</p> <p>With regard RSS conclusions there is concern that the number of windfall sites may not come forward in total or over the periods assumed</p>	<p>This comment is noted and the lower figure has now been implemented in future projections.</p> <p>UCS projections after 2016 have been removed completely in light of comments and an acceptance that the UCS does not provide valid figures after 2016.</p> <p>Comment noted and this has been altered accordingly in the housing trajectories.</p> <p>By discussing these sites with senior Council officers and the developers themselves the Council has attempted to be as robust in these predictions as possible. However it is accepted that mitigating circumstances may occur to alter these planned development rates. However it is deemed essential to the role of the housing trajectory to include all large sites that have planning permission.</p>
<p>13. GVA Grimley - Jelson</p>	<p>Concerned by the amount of reliance placed on windfall development – reference is made to draft PPS3 that states reliance should only be placed on windfall sites If there is no suitable greenfield sites available for allocation</p> <p>Further questions the reliance on the UCS and the</p>	<p>It is appreciated that this comment is valid in light of draft PPS3, however our existing commitments and past completion rates suggest that there is a steady supply of completions on brownfield windfall sites. As a result it is deemed necessary and appropriate to build these projections into the housing trajectories. An additional section has been added to the report to consider the release of the remaining Local Plan Allocation and therefore take account of greenfield development within Harborough District.</p> <p>In light of consultation comments we have attempted to</p>

	<p>chances of sites coming forward. Future expected completion rates bare no relation to the rates of completion witnessed over the last 3 years and are therefore highly questionable.</p>	<p>review our urban capacity figures, paying specific focus on past completions and existing commitments in an attempt to make figures more robust and conservative. A full review of the UCS to 2021 and 2026 is currently being considered.</p>
<p>14. Bob Woollard, Andrew Martin Associates – William Davis Ltd and Hallam Land Management</p>	<p>The degree in variation between completion rates on UCS sites suggests there is no suitable trend that can be identified for UCS sites and the completions that can be expected on them.</p> <p>There has been a unique situation in the development market over the past 5 years which has made brownfield sites viable for development however there is no guarantee that this will continue. There is also undue reliance placed on brownfield sites continuing to come forward. More consideration should be given to the limited amount of brownfield land available within a district like Harborough and the projected figures should reflect this.</p> <p>Feel that a longer time frame than 5 years should be used to generate a small site allowance.</p>	<p>This comment is accepted. As a result we have attempted to be as conservative with our approach as possible. In light of consultation comments we have attempted to review our urban capacity figures, paying specific focus on past completions and existing commitments in an attempt to make figures more robust. We have also eliminated the use of UCS figures after 2016 to minimise their impact.</p> <p>Emerging commitments on UCS sites in Harborough suggests that there is still a market for brownfield development. There is also evidence that brownfield sites continue to come forward that are not included within the UCS hence the use of average completions on non UCS sites in the housing trajectory.</p> <p>This comment is noted; however the PPS12 Good Practice Guide recommends the use of the previous 5 years figures or figures to the start of the plan period. As the year 2001/02 is the start of the adopted RSS the 2001/02 housing completion figure has been used. The same average has been used for the structure plan period to eliminate the higher completion levels between 1996 and 2001 which would have distorted the figure even more.</p>

	<p>Greater reference should be made to the draft DCLG guidance for assessing housing land availability which sets out a preferred methodology.</p> <p>The inclusion of smaller settlements within the UCS appears no longer appropriate especially in light of HDC preferred options of the core strategy and its settlement hierarchy. Review of the UCS should be carried out to filter out expected completions on these settlements.</p> <p>Now draft figures are available for the RSS to 2026 the information paper should take account of these and draw trajectories for this time frame</p> <p>It should be made clearer what is being done with the Great Glen allocation and whether or not it has been included in the commitments.</p>	<p>Comment is noted and this will be considered in reviewing the document</p> <p>All smaller settlements not included in the settlement hierarchy (as outlined in the emerging Core Strategy for Harborough District) have been removed and discounted to provide a more conservative and sustainable approach to future brownfield development.</p> <p>This information paper has focused on adopted documents. The AMR will include trajectories to 2026. It is envisaged that future reports will consider the Draft RSS to 2026.</p> <p>A separate section focusing on the remaining Local Plan Allocation has been included in the reviewed Information Paper.</p>
<p>15. Mr B Jarvis - Little Bowden Society</p>	<p>Accept comments and suggest no changes</p>	<p>Comment Noted</p>
<p>16. Stoneleigh Planning – John Littlejohn and Miller Homes</p>	<p>Site GG/2 is an allocated site within adopted local plan and therefore should be included within the housing trajectory. PPS12 guidance on housing trajectory states that allocated sites should be included it doesn't state whether or not these have to have permission and the council is not in a position to make unilateral decisions.</p> <p>Reference should be made to the emerging PPS3 which states that priority should be given to allocated sites and not windfall sites.</p>	<p>A separate section has been included in the reviewed Information Paper to consider the remaining Local Plan Allocation. This includes housing trajectory with the site at Great Glen included in the commitments.</p> <p>The emerging guidance is acknowledged by the Council, however past completion rates and existing commitments provide an evidence base to suggest brownfield completions are both viable and acceptable to include within the housing trajectories. The Council has attempted to be as conservative as possible in</p>

	<p>Have concerns about the timescales identified for KB/1 and MH/3. Do not believe that the site will deliver first houses in 2006/07 but at least 2007/08.</p> <p>The former railway station in Kibworth is expected to deliver completions at 7 dwellings a year over 5 years so the figures need to be adjusted to reflect this</p> <p>Concerned by over reliance on windfall sites, past completions have not been as high as what the trajectories are projecting and are therefore unsound. The rural nature of the District suggests brownfield windfalls are minimal and will decline over time not stay constant an average supply of 30 dwellings a year in the CLPA would be more reasonable</p> <p>Taking into account the need to project for at least a 10 year period figures should be provided for the adopted RSS timescale and the emerging RSS to 2026</p> <p>It is not appropriate to make allowance for large windfalls in advance of considering the full capacity of allocations in the adopted local plan in line with emerging PPS3</p>	<p>projecting these completions.</p> <p>Following discussions with David Wilson Homes and the planning officers working on the sites the projected rates of completion included in the trajectories for MH/3 and KB/1 are considered appropriate and realistic.</p> <p>Comment is noted and figures in the trajectories have been adjusted accordingly.</p> <p>Comment is noted and we have reviewed our brownfield windfall projections in light of consultation responses. We have reviewed the process by which we assess our urban capacity study and have also created a windfall average for non urban capacity sites. The figure is now in line with past completion rates and existing commitments.</p> <p>By projecting against Structure Plan targets the Council is using a 10 year time horizon in line with the Good Practice Guide for PPS12. By producing housing trajectory for the Adopted RSS to 2021 the Council is projecting against a 15 year time horizon in accordance with Draft PPS3.</p> <p>A new section has been included in the reviewed paper to take account of the remaining Local Plan Allocation. However it is clear from existing Commitments and those allocated sites that already have planning permission that the Council is able to provide sufficient housing to meet both Structure Plan and RSS targets until at least 2018 in the CLPA and until 2016 for the District as a whole</p>
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