

## Housing Land Supply (HLS)

The overall HLS of 2,960 dwellings is set out in Table 1 of the Plan summarised as :-

- 1,346 dwellings (578 dwellings built April 2011 – March 2017 and 768 dwellings existing commitments as at March 2017) ;
- 1,614 dwellings (129 dwellings allocated in Wigston town centre, 76 dwellings allocated in Oadby district centre, Direction for Growth Areas allocations for 1,159 dwellings and allocation of smaller sites (11 – 99 dwellings) for 250 dwellings in Leicester PUA).

The HBF do not comment on the merits or otherwise of individual sites therefore our representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectory (Figure 1). The Council's HLS assumes that all of the proposed allocations in the Plan will be found sound. However the soundness of individual allocations will be discussed throughout the course of the examination if any are found to be unsound these will need to be deleted from the HLS accordingly.

It is also essential that the Council's assumptions on lead-in times, non-implementation, lapse and delivery rates for sites are realistic. These assumptions should be supported by parties responsible for delivery of housing and sense checked by the Council using historical empirical data and local knowledge.

The figures set out in Table 1 provide no contingency within the HLS. The Council cites an additional 400 dwellings sourced as 40 dwellings from within the settlement boundary of Kilby Bridge, 300 dwellings from Phase 3 of the Wigston Direction for Growth and 70 dwellings from windfalls (see para 4.2.11) which the Council states negates any potential delivery issues on allocated sites and helps fulfil a small proportion of Leicester City's declared unmet need. This additional 400 dwellings represents a contingency of circa 13.5% the HBF always recommends as large a contingency as possible. The Council's proposed level of contingency is also below the 10 – 20% non-implementation gap together with 15 – 20% lapse rate illustrated by the DCLG presentation slide from the HBF Planning Conference September 2015 (see below). The slide also suggests "*the need to plan for permissions on more units than the housing start / completions ambition*".



## In recent years there has been a 30-40% gap between permissions and housing starts

- Gap of around 30-40% between the number of permissions given for housing and starts on site within a year. Estimate that for a year's permissions for housing around

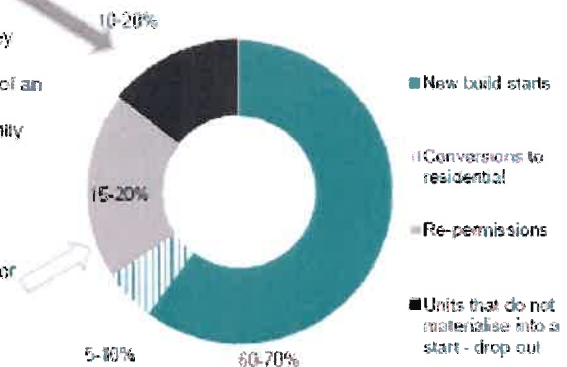
- 10-20% do not materialise into a start; the permission 'drops out': this could be because -

- the landowner cannot get the price for the site that they want
- a developer cannot secure finance or meet the terms of an option
- the development is later not considered to be financially worthwhile
- there are supply chain constraints hindering a start.

There may be scope to reduce this through policy

- 15-20% are not abandoned but a re-permission is sought, for example to make a major change to plans or to extend the development period

- Recent data and realities of private market suggests need to plan for permissions on more units than housing start/completion ambition.



Extract from slide presentation "DCLG Planning Update" by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

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).