

Document Reference	Respondent / Representation & Respondent Number	Summary of Comment / Issue	HBBC Response Summary & Action / Proposed Change
Paragraph 4.36	Carlton Parish Council (010/CU0053)	The PC recommends that a significant element of the affordable housing provision be reserved for people with a strong local connection, and made exempt from the right to buy so that it will remain available in perpetuity.	<p>Earl Shilton and Barwell are located within the Borough's urban area. In rural areas such as Carlton Parish, affordable housing is reserved in the first instance for people with a local connection to that parish or settlement. The rules on right to buy and right to acquire are set by central government, and exemptions from right to buy or right to acquire are only allowed on rural exception sites. The site at Nailstone Road in Carlton is a rural exception site, and therefore there is no right to acquire on this site.</p> <p>It will be possible for Section 106 agreements to include a cascade mechanism which in the first instance will give priority to people with a connection to the relevant settlement of Barwell or Earl Shilton.</p>
Section 6 – Barwell SUE	Barwell Parish Council (25/CU0959)	<p>Barwell Parish Council welcomes the mixture of housing types to be provided within the Sustainable Urban Extension, and is keen to see much-needed homes are made available for local families in Barwell.</p> <p>To that end, the Parish Council requests that Hinckley & Bosworth Borough Council puts policies in place to ensure that Barwell residents in need of affordable housing are given strict priority to homes built in the Sustainable Urban Extension.</p> <p>The Parish Council expects developers to employ technologies to minimise the carbon footprint of new homes wherever possible, both to limit the impact on environmental damage, and to reduce the operational costs for new residents as much as possible.</p>	<p>It will be possible for Section 106 agreements to include a cascade mechanism which in the first instance will give priority to people with a connection to the relevant settlement of Barwell or Earl Shilton.</p>
<p>Response is repeated in relation to:</p> <ul style="list-style-type: none"> • Paragraphs 1.7-1.9 • Figure 2 • Figure 3 • Figure 4 • Policy 6 • Policy 7 • Section 4 • Section 5 	J G P Properties Ltd (41/CU1304)	<p>The respondent states:</p> <p>The current wording of the AAP defines that future development in Earl Shilton will be governed and defined by the AAP document. The AAP will not result in the delivery of 2000 homes for Earl Shilton as described within the adopted Core Strategy.</p> <p>The document is unsound and requires amendment and the inclusion of the site at Westfield Farm.</p> <p>Since the adoption of the Core Strategy in 2009 the position has been maintained by HBBC that the Earl Shilton SUE can deliver 2000 homes at Earl Shilton with the associated regeneration benefits to the town centre.</p>	<p>During the preparation of the Core Strategy, the Council included an over-provision of 642 dwellings to act as a contingency should the SUEs not be able to accommodate the 4500 dwellings identified through Core Strategy policies 2 and 3. This over-provision will enable the Council to absorb the shortfall of 400 dwellings within the Earl Shilton SUE, as identified in this AAP.</p> <p>The Borough Council does not accept the respondent's conclusion that there is a shortfall in the five year supply of housing. At the time of the examination of the Core Strategy it was anticipated,</p>

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		<p>Various growth options at Earl Shilton had been tested/considered/evaluated and dismissed in the development of the Core Strategy, however since 2009 the finally adopted approach has not yet begun to be delivered in line with the predicted housing trajectory for Earl Shilton as contained in that Core Strategy.</p> <p>Evidence and arguments at every key stage have been submitted by JGP Properties that the SUE could not be solely relied upon to meet the need for homes, employment, and improved access to green space, community improvements, health benefits, affordable housing and a sustainable addition of homes to the existing settlement of Earl Shilton.</p> <p>Indeed Westfield Farm was evaluated during the development of the Core Strategy and scored very highly as an option for development, however at the time a sufficient scale of development could be delivered by the Earl Shilton SUE to meet the relevant needs of the settlement. The market was not at that time suffering from a recession.</p> <p>A context for looking at the Westfield Farm site has been set in two key information documents i.e. the Residential Land Availability Report (1 April 2011 – 31 March 2012) and the Housing Trajectory (October 2012). These documents identified an additional requirement of 1201 dwellings to be allocated in the main urban areas which includes Earl Shilton. Paragraph 3.8 of the Residential Land Availability report states with regards this additional number of dwellings, that:</p> <p>“These are the additional number of dwellings to be allocated where necessary to meet the minimum housing requirement specified in the Core Strategy in the urban areas of Hinckley, Barwell, Burbage and Earl Shilton and the Key Rural Centres and Rural Villages. This dwelling provision is displayed on rows 6 and 7 of the housing trajectory. The dwellings will be allocated where necessary in the Site Allocations & Generic Development Management Policies DPD (SA&GDM DPD), which will be informed by the Strategic Housing Land Availability Assessment (SHLAA).”</p> <p>The Westfield Farm site is included in the 2010 SHLAA Review (AS Ref: 217) where the assessment concludes that the site is “developable”.</p> <p>The Earl Shilton SUE will not deliver the 2000 dwellings anticipated by the Core Strategy with it further scaled back to 1550 dwellings in the April and October 2012 Housing Trajectory from the 1650 dwellings projected in the April 2011 and October 2011 Housing Trajectories.</p> <p>In addition to the above, Paragraph 4.12 of the Core Strategy sets out the Council’s contingency strategy should the SUEs fail to deliver the housing requirements or if there are any small scale shortfalls in the housing provision</p>	<p>and accepted by the Planning Inspector, that there would be shortfalls in housing land supply in the early years and that these would be made up later in the Plan period, when, for example, the SUEs come on stream.</p> <p>As at April 1st 2013 the Borough Council’s housing supply position equates to 5 years and 7 months (5.58 years). The Council has updated its housing trajectory (an update to that presented under paragraph 10.5 of the AAP) including large and small site commitments, the two SUEs and the additional number of dwellings to be allocated. Appendix 1 below provides the revised housing trajectory to reflect the housing supply position as at 1st April 2013. It is proposed this table replaces the table under 10.5 of the AAP as a proposed change.</p> <p>As evident from Appendix 1 the Barwell SUE is anticipated to come on-stream during the monitoring year of 2014/15 and Earl Shilton from 2015/16. Furthermore, the overall housing trajectory for the Borough meets and exceeds the Core Strategy requirement from 2016/17 onwards, a year earlier than anticipated presented in Appendix 2 Housing Trajectory of the Core Strategy. It is projected that the number of completions will be 10083 by the end of the plan period, 416 more than the Core Strategy requirement. Whilst the number of completions at the Barwell SUE will reach 2320 by 2025/26, it is projected that the remaining 180 dwellings will be delivered in 2026/27. The information regarding the housing trajectories for the SUEs has been informed by the developers.</p> <p>The respondent notes the contingency arrangements set out paragraph 4.12, in the event that the SUEs are not delivered. Any review of the Strategy will consider the findings in the Directions for Growth paper. The Borough Council has included an appropriate Monitoring framework to monitor the delivery of the Core Strategy requirements. As presented above, no information has been presented to the Council that the SUEs will not be delivered at the projected rate, triggering the need for such a</p>

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		<p>identified through the Annual Monitoring Report. It says that the latter will be addressed through a review of sustainable sites identified in the Council's Strategic Housing Land Availability Assessment, which are not prioritised through the Site Allocations and Generic Development Control Policies DPD.</p> <p>Furthermore, taking the locational merits of the Westfield Farm site and the lack of a five year housing land supply identified in Hinckley and Bosworth Borough together suggests that there is potential for the site to be considered favourably. There is now quite a body of appeal decisions, both from around the country and locally, that would support the land supply issue as the salient point.</p> <p>Consultation is currently being undertaken by the future applicants for the Earl Shilton SUE, currently the proposals on 61.1 hectares of the 68.9 hectares available will provide among other land uses 1,340 homes, even factoring up the remaining land this equates to 1511 homes for Earl Shilton and the SUE, some 489 units less than the Core Strategy had identified based on consultation, analysis and statistical research.</p> <p>This is compounded by the fact that the homes will not begin to be delivered until 2016 onwards subject to market conditions and more importantly a planning approval.</p> <p>Larger schemes such as the Earl Shilton SUE are notorious for taking longer to get off the ground even in strong market conditions, however once started they do deliver consistently new homes following the first year of ramp up and before the final year of ramp down (subject to reasonably consistent market conditions).</p> <p>As stated in the AAP document paragraph 2.4 “The NPPF is underpinned by the ‘presumption in favour of sustainable development’ which requires LPAs to positively seek opportunities to meet the development needs of their area and meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”.</p> <p>The current structure of the AAP will:</p> <ul style="list-style-type: none"> • not deliver 2000 homes at the Earl Shilton SUE, subsequent revision of the design will not result in sufficient increase in numbers from an approximation of 1510 units. • increase the current shortfall of the 5 year housing supply. Summary evidence of the current 5 year supply is provided in an accompany note to these representations titled Westfield Farm – HBBC Assessed 5 Year Supply. Clearly as HBBC release further housing statements as part of the Examination greater detailed analysis will be provided by JGP Properties. • not result in sufficient improvement and regeneration to the town centre in a 	<p>review and the requirement to identify alternative site allocations.</p> <p>In reply to the site being proposed by the respondent and the request for greater flexibility to accommodate additional sites, the site lies outside of the settlement boundary and Policy 2 of the Core Strategy states that no piecemeal developments will be permitted. Furthermore, the minimum requirement to be delivered within the settlement boundary for 10 dwellings has been exceeded.</p> <p>All site allocations to accommodate the residual housing requirement for the remainder of Borough will be allocated in the emerging Site Allocations and Development Management Policies DPD, the pre-submission version of which is due to be consulted in March 2013.</p>

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		<p>short enough timescale, the SUE master plan cannot guarantee the usage of the town by residents of the SUE it will be inconveniently located and will be a heavily car dependent addition to Earl Shilton.</p> <ul style="list-style-type: none"> • not conveniently link the “Heart” of Earl Shilton with the SUE therefore limiting the interrelationship with the town. • fail the test of soundness at an examination due to failing to deliver the objectives and policies of the adopted Core Strategy and the principles of the NPPF. • not deliver sufficient housing numbers in an appropriate timescale. <p>Subsequently the AAP needs to change in order to enable the delivery of the Core Strategy policies and objectives.</p> <p>The AAP needs to be amended to create greater flexibility for the potential of additional sustainable sites to come forward at Earl Shilton to meet the shortfall of the SUE to generate sufficient homes and regeneration prospects for the town. As currently written the AAP has insufficient flexibility and an unhealthy dependence on the SUE alone making the document unsound.</p> <p>Depending on the determined shortfall the land at Westfield Farm as explained within the document titled Westfield Farm – “Sustainable Growth at the Heart of Earl Shilton” can contribute considerably to the sustainable regeneration of Earl Shilton combined with the SUE, providing between 200 – 350 homes dependent on the final determined need for the settlement and the capacity of the SUE scheme.</p> <p>Sufficient evidence, consultation and technical comparison has been prepared by JGP Properties and HBBC to enable that decision to be made for the site to be included in the AAP and tested at the Examination.</p> <p>Amendment of Figure 2 to include land at Westfield Farm as presented within the accompanying document titled: Westfield Farm – “Sustainable Growth at the Heart of Earl Shilton”.</p> <p>More accurate graphical representation of the relationship of both the Earl Shilton SUE and the Heart of the settlement within Figure 2.</p> <p>Figure 3: Proposals Map needs to be amended to take account of Westfield Farm.</p> <p>Figure 4: Earl Shilton Sustainable Urban Extension Development Framework needs to be amended to take account of Westfield Farm.</p>	

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Not specified	Geoffrey Prince (42/CU0130) on behalf of Cawrey Limited (CU0056)	<p>Weak Market Demand</p> <p>Barwell and Earl Shilton are not known areas of high market demand. Average house prices in 2012 were well below the average for Hinckley and Bosworth, Leicestershire and also the East Midlands (see Table 1 below). In summary average house selling house prices in Earl Shilton and Barwell are 77% and 79% respectively of the average regional house selling price. In terms of selling prices per square foot, these are assessed as being in the range £130-£150 per square foot, which is low.</p> <p>Table 1 Comparison of House Prices</p> <table border="1" data-bbox="964 709 2050 1268"> <thead> <tr> <th></th> <th>Earl Shilton</th> <th>Barwell</th> <th>Hinckley</th> <th>Leicestershire</th> <th>East Midlands</th> </tr> </thead> <tbody> <tr> <td>Detached</td> <td>179,610</td> <td>165,556</td> <td>233,611</td> <td>258,949</td> <td>226,353</td> </tr> <tr> <td>Semi Detached</td> <td>115,824</td> <td>115,444</td> <td>136,526</td> <td>148,245</td> <td>133,958</td> </tr> <tr> <td>Terraced</td> <td>102,098</td> <td>90,500</td> <td>123,795</td> <td>127,542</td> <td>115,063</td> </tr> <tr> <td>Average Selling Price</td> <td>123,766</td> <td>127,096</td> <td>158,270</td> <td>176,531</td> <td>160,778</td> </tr> <tr> <td>Average SP as %of average EM SP</td> <td>77%</td> <td>79%</td> <td>98%</td> <td>110%</td> <td>-</td> </tr> </tbody> </table> <p>Source:</p> <p>Given weak market demand it is hard to anticipate the optimistic housing trajectory (at para 10.5) which shows 3,800 houses will be built between 2014/15 and 2025/26 (3870 in HBBC's latest trajectory), equivalent to an average completion/sales rate of 316 per annum (6.1 per week). Average annual completion rates will increase from 225 (4.3 per week) in 2014/15 to a peak of 6.9 house completions pa between 2019/20 and 2021/2022. The latest HBBC trajectory shows average house completions increasing from 81 in 2014/15 (1.5 per week) to 450 (8.7 per week in 2020/21) (refer Table 2 below). To sustain a rate of house completions of between 6.9 and 8.7 per week over 8 years is just not feasible – I am not aware of any sites in the East Midlands where this has been achieved in the past 20 years (one of the highest is Gamston in West Bridgeford near Nottingham (a high value area) where 300 houses (6 per week) were completed annually for a period of 2-3 years during the 1990s).</p>		Earl Shilton	Barwell	Hinckley	Leicestershire	East Midlands	Detached	179,610	165,556	233,611	258,949	226,353	Semi Detached	115,824	115,444	136,526	148,245	133,958	Terraced	102,098	90,500	123,795	127,542	115,063	Average Selling Price	123,766	127,096	158,270	176,531	160,778	Average SP as %of average EM SP	77%	79%	98%	110%	-	<p>As presented above, the Borough Council has included an appropriate Monitoring framework to monitor the delivery of the Core Strategy requirements. As discussed above, no information has been presented to the Council that the SUEs will not be delivered at the projected rate, triggering the need for such a review and the requirement identify alternative site allocations.</p> <p>To understand the viability and test the deliverability of the SUEs, the Council commissioned a Viability and Deliverability Assessment (May 2013). The study considers the national and local market policy context (Section 2) to establish what the private market will deliver in the current economic, funding and policy climate. The study considers a range of lower to higher quartile marketed prices and actual achieved prices throughout each of the settlements to inform average sales prices per square foot. It should be noted that the study. The Council is confident that the work undertaken to understand the local market context is appropriate and robust. Whilst the assumptions regarding the market context submitted by the respondent are not accepted, no consideration has been given to a change in the market. The Viability Study states:</p> <p>“By way of their scale, Sustainable Urban Extensions to an extent are able to make their own market, especially in areas of traditionally low to moderate value. In these instances, SUEs are able to create their own high quality environment, widening the geographical residential market for homes in the area by attracting buyers who might not otherwise be attracted to the area.”</p>
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		<p>Recent figures from national house-builders show sales per site outside London are in the region of 0.25 to 0.5 per week; on large sites with say 3-4 housebuilders it is unlikely that sales will exceed 2 per week, which is about one third to one quarter of that anticipated on the housing trajectory in the AAP document.</p> <p>Based on HBBC's latest housing trajectory the Earl Shilton and Barwell SUEs are expected to deliver 51% of the total projected completions between 2013/14 and 2025/26; between 2018/19 and 2025/26 this figure increases to between 62% and 77% on an annual basis. As a percentage of HBBC's average annual Core Strategy requirement of 450, then the SUEs will be expected to deliver between 80% and 100% of all housing between 2018/19 and 2025/26 on an annual basis (refer Table 2 attached). This is not healthy for the housing market, restricting choice, and is not in accordance with the NPPF which requires LPAS to identify a supply of housing land to ensure choice and competition in the market (refer NPPF para 47).</p> <p>Table 2: Analysis of Housing Trajectory PLEASE SEE ORIGINAL RESPONSE</p> <p>Having regard to the wider Leicester and Leicestershire HMA there is a wider housing market issue to consider, and that relates to the overall provision of housing across the Leicester and Leicestershire HMA, where in total 9 SUEs are planned with a total capacity of over 20,000 homes. At present none of these have started to deliver housing, and all are at varying stages of planning, and facing difficulties due to delays in preparing Local Plan Core Strategies (in some cases the draft Core Strategies have been withdrawn upon advice of Inspectors), Allocation Plans and Area Action Plans; land ownership complications, expensive up front highway and transportation infrastructure requirements; viability and funding. As such many of these authorities can not demonstrate a five year housing land supply.</p>	
		<p>Not deliverable within Timescale of Core Strategy</p> <p>Due to unrealistic assumptions on projected completions and weak market demand it is clear that the target number of houses will not be provided within the timescale, and therefore a much slower pace of development will need to be assumed.</p> <p>Also the Earl Shilton SUE does not have planning consent as yet and the Barwell SUE only has a deemed outline planning consent subject to the signing of a S106 Agreement, and as such it is highly unlikely that the SUEs will start to deliver housing during 2014/15. Indeed the start date for the delivery of the SUE's has</p>	<p>The Council does not accept the conclusion that a much slower pace of development will need to be assumed.</p> <p>As evident from Appendix 1 the Barwell SUE is anticipated to come on-stream during the monitoring year of 2014/15 and Earl Shilton from 2015/16. Furthermore, the overall housing trajectory for the Borough meets and exceeds the Core Strategy requirement from 2016/17 onwards, a year earlier</p>

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		<p>already slipped and continues to slip.</p> <p>Assuming that delivery does commence, a more realistic rate of completions and sales from both the Earl Shilton and Barwell SUEs may average 4 sales per week, then the annual amount of completions will be in the order of 200 (i.e. 100 per SUE). Assuming a start date for both SUEs in 2016/17, then approximately 2,000 new homes might be built during the remainder of the plan period to 2025/26. I would contend that even this is a very optimistic assumption.</p> <p>However, this will result in a shortfall in HBBC's Core Strategy housing provision over the plan period of 1,870 dwellings. Either HBBC will need to give consideration to identifying additional allocations through its Allocations DPD and/or a review of its Core Strategy.</p>	<p>than anticipated presented in Appendix 2 Housing Trajectory of the Core Strategy. The information regarding the housing trajectories for the SUEs has been informed by the developers.</p> <p>Any review of the Strategy will consider the findings in the Directions for Growth paper. The Borough Council has included an appropriate Monitoring framework to monitor the delivery of the Core Strategy requirements. As presented above, no information has been presented to the Council that the SUEs will not be delivered at the projected rate, triggering the need for such a review and the requirement to identify alternative site allocations.</p>
		<p>Viability</p> <p>In its research paper on UK Residential Development Land (April 2012), Savill's concluded that:</p> <ul style="list-style-type: none"> • Only in London and parts of SE are land values is the residential land strong with land values returning to pre recession levels. Outside London and the SE there is some interest in manageable opportunities in the 'best' towns ; • The focus is on small manageable land opportunities which can be funded from a developer's balance sheet; • Large urban sites, particularly in secondary locations are not trading; • Lending to companies involved in real estate development remains depressed; • There are problems of viability on pre-consented medium and long term sites. The majority of bulk land (i.e. large Greenfield sites and large regeneration sites) do not stack up as a development opportunity; • Market in these types of sites is likely to remain flat for at least 5 years; • Investors are however prepared to hold as an investment and hope for an increase in value and viability with land assets being realised in the long term. <p>Whilst there are signs of market improvement driven by the government's Help to Buy Scheme, at a local level we are aware that heavy discounting is on-going, particularly on sites in areas of weak market demand, which can only serve to undermine overall viability/slowdown in build rates in places such as Barwell and Earl Shilton. Also, we note that over 50% of new house sales in the East Midland and North of England are only being achieved through part exchange deals and the government's help to buy scheme (in some areas this reaches 70%).</p>	<p>The Council is confident in the viability and deliverability assessment provides sufficient and robust locally derived information to inform the overall viability of the schemes taking into account the local market context and standard industry benchmark assumptions. The study includes sensitivity testing of a more pessimistic market scenario. The sensitivity testing has regard to cost and sales inflation and the Code for Sustainable Homes.</p> <p>The Council do not consider that sufficient information has been submitted by the respondent to substantiate the assumptions regarding viability of the SUEs.</p>

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		<p>More specifically the Infrastructure Schedule identifies the infrastructure requirements for the Barwell and Earl Shilton SUEs, sources of funding and indicative phasing. Overall infrastructure costs including an affordable housing payment in lieu of some off set provision) are estimated at £78.8m of which £42.8m is for Barwell (average of £17,120 per dwelling) and £27.7m (£17,312 per dwelling). Given the weakness of market demand, low average selling prices it is unlikely that the development can sustain this level of infrastructure contributions, which are normally in the range £5,000 -£8,000 for typical residential schemes in HBBC. The figure derived from the Infrastructure Schedule is more than double the average S106 contributions negotiated for recent housing schemes in Hinckley and Bosworth. Moreover the Infrastructure Schedule shows a high proportion (around 75%) of these contributions becoming due within the first 5 years of development commencing. This is likely to put a severe strain on the developer's financial plan.</p> <p>At the same time housebuilders will be expected to meet the Code for Sustainable Homes Level 3 and higher (carbon free/level 6 by 2016) which will significantly increase the costs of construction, thus undermining viability even further.</p> <p>As such we can not agree with the DTZ Viability and Delivery Assessment Report, which concludes that both SUE's represent viable and sound propositions capable of delivery policy compliant affordable housing packages, together with substantial s106 and highway and public transport packages. Specifically we disagree with the assumptions used in these reports, as follows:</p> <ul style="list-style-type: none"> • All in construction cost of £80 per sq ft. We believe that this should be upwards of £85 per sq ft to reflect rising labour and material costs and also meeting higher CSH levels over the life of the projects; • Average selling prices based on £180 per sq ft which is well above house prices being achieved in the local area, which are in the region of £130-£150 per sq ft; • Finance Costs which we do not fully reflect the high upfront costs of meeting the S106 obligations, off site affordable housing and highway contributions, and the fact that rates of delivery will be slower than anticipated. <p>Based on our revised assumptions we set out below our assessment of viability for both schemes. In summary both schemes will result in a negative land value and as such are not viable. Under such circumstances it is likely that the developers will either sit on the land until viability improves, build it out at a much slower rate, and/or seek to renegotiate the S106, affordable and highway and public transport packages, and seek to reduce landowners expectations of land</p>	

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		<p>value.</p> <p>Table 3 Viability Assessment</p> <table border="1" data-bbox="964 394 2050 1094"> <thead> <tr> <th></th> <th>Barwell SUE</th> <th>Earl Shilton SUE</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>Total Costs</td> <td>£356.5m</td> <td>£229.4m</td> <td></td> </tr> <tr> <td>Build (Including Fees and Contingency)</td> <td>£203.6m</td> <td>£131.7m</td> <td>Assume 6.25% increase on build costs</td> </tr> <tr> <td>Infrastructure and S106</td> <td>£51.9m</td> <td>£31.3m</td> <td>No Change</td> </tr> <tr> <td>Finance Costs</td> <td>£20.2m</td> <td>£14.8m</td> <td>Assume to be 25% higher to reflect longer implementation period</td> </tr> <tr> <td>Marketing and Sales</td> <td>£10.5m</td> <td>£6.7m</td> <td>3% of total receipts</td> </tr> <tr> <td>Profit</td> <td>£70.3m</td> <td>£44.9m</td> <td>Assume 20% of Total Value</td> </tr> <tr> <td>Total Receipts</td> <td>£351.5m</td> <td>£224.3m</td> <td>Assume 10% reduction in selling prices</td> </tr> <tr> <td>SUE Area (Acres)</td> <td>323</td> <td>169</td> <td></td> </tr> <tr> <td>Residential Land Value</td> <td>-£5.0</td> <td>-£5.1m</td> <td></td> </tr> <tr> <td>Threshold Land Value (per acre)</td> <td>£100,000</td> <td>£100,000</td> <td></td> </tr> <tr> <td>Estimated Residential Land Value per acre</td> <td>-£15,800</td> <td>-£30,200</td> <td></td> </tr> </tbody> </table>		Barwell SUE	Earl Shilton SUE	Comment	Total Costs	£356.5m	£229.4m		Build (Including Fees and Contingency)	£203.6m	£131.7m	Assume 6.25% increase on build costs	Infrastructure and S106	£51.9m	£31.3m	No Change	Finance Costs	£20.2m	£14.8m	Assume to be 25% higher to reflect longer implementation period	Marketing and Sales	£10.5m	£6.7m	3% of total receipts	Profit	£70.3m	£44.9m	Assume 20% of Total Value	Total Receipts	£351.5m	£224.3m	Assume 10% reduction in selling prices	SUE Area (Acres)	323	169		Residential Land Value	-£5.0	-£5.1m		Threshold Land Value (per acre)	£100,000	£100,000		Estimated Residential Land Value per acre	-£15,800	-£30,200		
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Threshold Land Value (per acre)	£100,000	£100,000																																																	
Estimated Residential Land Value per acre	-£15,800	-£30,200																																																	
		<p>Insufficient Delivery of Affordable Homes</p> <p>The Core Strategy sets an affordable housing target of 20% provision at both SUEs; however in the AAP this is reduced to 10% with an off site contribution equivalent to half the Core Strategy provision. The Infrastructure Delivery Plan shows a total off site affordable housing contribution of £20.3m which is the equivalent to a contribution of around £50k per affordable dwelling to be provided off site. This contribution appears to be on the low side, when compared to contributions negotiated by other authorities for off site provision which are in the order of £80k per dwelling.</p> <p>Notwithstanding whether the off site contributions are reasonable, there is no indication of where HBBC intend to provide these affordable homes, when they will be built, by whom and who will be responsible for their long term management. We consider that more detail should be provided, given that the SHMA identified a significant requirement for affordable homes across the Borough.</p> <p>Between 2006 and 2012 459 affordable homes were delivered in HBBC, equivalent to 20% of total completions of 2,263. The Core Strategy requires 2,090 to be built over the plan period 2006-2026, thus leaving 1,631 to be provided. Given a net housing requirement of 6,737 (2012-2026) then 24% of all</p>	<p>The Commuted Sums calculated are indicative on the basis that there are a number of variables which could result in a fluctuation of the final contributions to be sought such as a variation in the housing mix or the percentage of affordable housing delivered on-site.</p> <p>Paragraphs 5.4.2.1-5.4.2.3 set out the assumptions used to inform the commuted sums presented in the infrastructure schedule. The housing mix has been informed by the Borough Council's Housing Strategy and Enabling Officer. The AAP seeks to make the necessary provision for affordable housing in conformity with Policy 15 of the Core Strategy.</p> <p>Policy 15 states that the affordable housing provision may be negotiated on a site-by-site basis taking into account a range of factors. As illustrated in Appendix 1 below, the Borough Council has projected that the number of completions will be 10083 by the end of</p>																																																

Document Reference	Respondent / Representation & Respondent Number	Summary of Comment / Issue	HBBC Response Summary & Action / Proposed Change
		<p>completions during the plan period need to be affordable homes. Given the limited delivery of affordable homes from rural areas (40% of 276, which equates to 110 homes (notwithstanding issues of viability at this level of affordable housing), this leaves 1,521 to be delivered from the SUEs and Hinckley UA at a policy target rate of 20%. However, 1,521 represents 23.5% of the total net Core Strategy requirement still to be built. Given that in some years HBBC is expecting up to 100% of the Core Strategy requirement or up to 77% of the projected completions to come from the Earl Shilton and Barwell SUEs, which as we have demonstrated are not viable at the current level of infrastructure contributions, it would appear that HBBC will face an increasing shortfall in the delivery of affordable homes over the remainder of the plan period.</p> <p>Indeed the shortfall will be even greater if the planned rate of growth in the proposed SUEs at Earl Shilton and Barwell is significantly slower as demonstrated in these representations, then the shortfall in the provision of affordable homes can be expected to be even higher.</p> <p>As such the strategy for the SUEs will not enable the requirements of Strategy Policy SP15 Affordable Housing to be met.</p>	<p>the plan period, 416 more than the Core Strategy target and 1083 more than the Core Strategy requirement of 9000. It is possible that any shortfall in affordable housing could be delivered as part of the overprovision.</p> <p>The calculation for commuted sums is set out in paragraph 7.16 of the Affordable Housing Supplementary Planning Document (AAP 12) and the final figure will be agreed through evidence supplied by the developer in relation to their scheme to inform this calculation.</p> <p>The Council is developing a delivery plan for new affordable housing which prioritises the supply of new affordable housing in rural areas.</p>
Policy 18: Carousel Park	National Federation of Gypsy Liaison Groups (40/15607)	<p>Whilst the intended provision for Travelling Showpeople is welcomed, the absence of any intended provision for other Traveller groups is disappointing. Consideration should have been given to such provision as part of the Sustainable Urban Extensions (SUS). If such provision in the SUS is not considered necessary or desirable, an explanation for this should be included in the supporting statements. Given the need for additional provision for Traveller pitches, the SUS seem to offer an opportunity for meeting some of this need, beyond that intended for Travelling Showpeople.</p> <p>Either include provision for Traveller pitches or explain the reasoning behind the decision to omit provision.</p>	<p>It is not the purpose of the AAP to make the necessary provision for gypsy and traveller accommodation. Paragraph 6.48 makes reference to an update to the Gypsy and Traveller Accommodation Needs Assessment (GTAA), which was published by the Borough Council in September 2013. The Council has programmed the preparation of the Gypsy and Traveller Development Plan Document (G&TDPD). The GTAA will form part of the evidence base to inform the preparation of the G&TDPD, the purpose of which will be to make the necessary provision for Gypsy and Traveller sites throughout the Borough.</p>

Appendix 1: April 2013 Housing Trajectory (including large and small commitments, SUEs and additional number of dwellings to be allocated)

Row Number		2006/2007	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	Totals
1	Past completions	438	398	474	353	227	373	227														2490
2	Projected net additional dwellings per annum (Large site commitments)								194	512	653	413	209	52								2033
3	Small/Conversion Site Commitments								67	66	65	64	46									308
4	Barwell Sustainable Urban Extension (2500 dwellings) (see 12/00295/OUT)*									15	105	120	180	200	200	250	250	250	250	250	250	2320
5	Earl Shilton Sustainable Urban Extension (1550 dwellings)										80	120	120	160	180	200	150	150	135	135	120	1550
6	Additional number of dwellings to be allocated in urban areas (Hinckley, Burbage, Barwell & Earl Shilton)**										22	51	141	134	136	101	128	126	89	89	89	1106
7	Additional number of dwellings to be allocated in rural areas**											5	7	37	36	36	35	32	31	29	28	276
	Completions/Projected Completions	438	398	474	353	227	373	227	261	593	925	773	703	583	552	587	563	558	505	503	487	10083
	Cumulative Completions/Projected Completions	438	836	1310	1663	1890	2263	2490	2751	3344	4269	5042	5745	6328	6880	7467	8030	8588	9093	9596	10083	
	Core Strategy Requirement	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450	450
	Cumulative Core Strategy Requirement	450	900	1350	1800	2250	2700	3150	3600	4050	4500	4950	5400	5850	6300	6750	7200	7650	8100	8550	9000	
	Dwellings above or below the Core Strategy Requirement	-12	-52	24	-97	-223	-77	-223	-189	143	475	323	253	133	102	137	113	108	55	53	37	
	Cumulative Overprovision/Shortfall	-12	-64	-40	-137	-360	-437	-660	-849	-706	-231	92	345	478	580	717	830	938	993	1046	1083	
	Annual Requirement taking into account of past completions/projections	450	451	454	452	459	474	481	501	521	514	473	440	407	382	353	307	243	137	-47	-596	

* The illustrated phasing for the SUE indicates 180 dwellings will be completed in 2026/27

** These dwellings will be allocated where necessary through the Site Allocations DPD. The first five years are deliverable and developable sites identified in the SHLAA Review 2013