



NORTH WEST LEICESTERSHIRE LOCAL PLAN EXAMINATION

FURTHER POSITION STATEMENT

RE: HEDNA IMPLICATIONS / FUTURE PLAN REVIEW

MARCH 2017

BY ROSCONN STRATEGIC LAND (ID:36)

Rosconn Strategic Land (RSL) outline further comments to supplement those made at the Matter 1 Hearing in respect of the issues related to Legal Compliance and Future Plan Review, further to the publication of HEDNA and District Council's more recent submissions.

RSL confirm they wish to attend the Further Examination Hearings as necessary in respect of the comments within this statement, as well as those associated with our response to the HEDNA, submitted on our behalf by Pegasus Group.

RSL's position, as shared with other representors, is that the OAN identified within the HEDNA at 481 dwellings per annum significantly underestimates the economic led housing needs in North West Leicestershire. As such, the retention of 520 dpa as the housing requirement within the Plan provides no flexibility to contribute towards the identified unmet housing need within the wider HMA (EX/68 indicates this is in the order of 7,610 dwellings to 2031).

Notwithstanding the robustness of the HEDNA for both District and wider HMA, Leicester City Council (EX/78) have declared they are unable to meet in full their full objectively assessed housing needs and whilst a definitive figure of its likely shortfall cannot be confirmed, it states that the scale is of such magnitude that it will require co-operation from HMA Partners. Furthermore, Leicester City's response indicates a need to work with North West Leicestershire and others to ensure the full OAN for the HMA is accommodated within the HMA by ensuring emerging plans are flexible enough to respond to addressing unmet need.

HEDNA is now a material planning consideration to the soundness of the Plan at examination. The evidence demonstrates there is an unmet need arising now within the HMA and that North West Leicestershire will be required to cooperate with Leicester City in meeting this unmet need. There is a risk that adopting the Plan in light of this evidence would render the Plan out of date immediately on adoption. As we have highlighted within our previous Position Statements, there is no comfort provided by the review mechanism offered by Policy S1, as modified. As previously highlighted, there are various examples across the country where early Plan reviews have not occurred. A more sensible approach would be to ensure that an appropriate level of flexibility is provided within the housing requirement of the Plan, or otherwise a reserve site policy included so that the issue of unmet needs can be addressed in a timely manner so that housing can be delivered within the Plan period.

The operation of the Duty to Cooperate during the plan-making process is the only means by which the issue of cross boundary issues such as strategic housing needs can be adequately addressed. The recent Housing White Paper has acknowledged at paragraph 1.9 that this has not been successful in some parts of the country and as such, further changes to the NPPF are required to ensure that authorities work together to meet housing requirements.

As previously discussed, whilst it is a Government requirement to progress Plans to adoption as soon as possible, this should not be at the cost of watering down the tests in the NPPF.