



**EXAMINATION – MATTERS FOR DISCUSSION
NORTH WEST LEICESTERSHIRE LOCAL PLAN EXAMINATION
POSITION STATEMENT ON ON BEHALF OF:
DAVIDSONS DEVELOPMENTS LIMITED, (Rep 56), WESTERN
RANGE LIMITED (Rep 50) AND RADLEIGH HOMES (Rep 28)**

MATTER 1: Legal Compliance and Future Plan Review

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c. Does Policy S1 of the Plan, with the MM1 proposed by the Council, make appropriate, justified and effective provision in current circumstances for early review of the Plan to take into account the conclusions, yet to be published, of the joint Housing and Employment Needs Assessment (HEDNA) and/or other research?

- 1.1 In response to the Submission Draft Plan we made representations on paragraphs 5.8 and 5.9 and Policy S1 in relation to the proposed approach set out by the Council to take account of the findings of the HEDNA report.
- 1.2 The Council's Main Modification MM1 (EX16) presents amendments to Policy S1 which seeks to reflect the Joint Statement by Leicester and Leicestershire Authorities on Collaborative Planning (EX04). MM1 continues to propose that any issues arising from the HEDNA report will be addressed through a review of the plan unless there is sufficient flexibility already provided for within the Local Plan.
- 1.3 It is understood that the HMA authorities have received a copy of the HEDNA report and that it is due to be published in the New Year. It is understood that the HEDNA report will be based on the latest 2014 Sub National Household Projections (SNHP) and, in accordance with National Planning Practice Guidance (NPPG) consideration will be given to the need for any further adjustments to reflect economic factors and issues of affordability.
- 1.4 Looking at the comparison between the 2012 SNHP and the 2014 SNHP, this shows increased levels of household growth for both Leicestershire and the Leicester Urban Area. For North West Leicestershire, household growth between 2014 and 2037 increases from 14.4% in the 2012 SNHP to 16.6% in the 2014 SNHP. The general picture is therefore one of increased household growth in the housing market area. This is before any adjustments are made to reflect economic aspirations in the area. In setting its housing requirement, the Council has sought to take account of the implications of the East Midlands Gateway Rail Freight interchange.

Table 1: Comparison of 2012 and 2014 SNHP for Leicester and Leicestershire

EAST MIDLANDS – Summary of the DCLG Sub National Household Projections

Administrative area:

	HOUSEHOLDS					
	2012 BASED SNHP			2014 BASED SNHP		
	2014	2037	% CHANGE	2014	2037	% CHANGE
Leicestershire	274,685	323,998	18.0%	275,580	332,017	20.5%
Blaby	39,586	45,029	13.7%	39,555	45,763	15.7%
Charnwood	69,127	86,250	24.8%	69,602	90,002	29.3%
Harborough	36,240	44,417	22.6%	36,289	45,091	24.3%
Hinckley and Bosworth	46,532	54,102	16.3%	46,636	54,868	17.7%
Melton	22,024	25,629	16.4%	21,899	25,448	16.2%
North West Leicestershire	39,817	45,570	14.4%	40,154	46,818	16.6%
Oadby and Wigston	21,359	23,001	7.7%	21,445	24,027	12.0%
Leicester UA	125,941	152,665	21.2%	126,343	160,719	27.2%

- 1.5 The Leicester and Leicestershire SHMA, 2014 (Doc HO/03) at Table 10 identified a starting point for housing requirements based on the 2011 based Sub-National Household Projections of 66,700 dwellings (3,335 dwellings per annum) for the HMA between 2011 and 2031. The latest 2014 based household projections indicate a starting point need for 83,605 dwellings (4,180 dwellings per annum) over the same period – a 25% increase.
- 1.6 The evidence suggests therefore that housing requirements for the HMA are likely to increase significantly. In this context, the approach proposed to be adopted by the Council will almost inevitably mean an early review of the plan to address implications arising from the HEDNA report.
- 1.7 The Housing Trajectory included at Appendix 2 to the Submission Draft Plan assumed the delivery of 10,769 dwellings over the plan period against the minimum requirement of 10,400 dwellings. This represented a 3.5% surplus against the requirement. The Council has published an updated trajectory at October 2016 (EX19). This shows the provision of 10,592 dwellings – a reduced surplus of 1.8% against the target. The Council’s trajectory therefore provides for a very limited degree of flexibility.
- 1.8 In our representations on the Submission Plan we referred to the Local Plan Expert Group report to Government which recommends that in order

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to ensure a 5 year supply of housing land and more effective supply for the medium to long term, provision should be made for additional flexibility over and above objectively assessed need along with provision for developable reserve sites.

- 1.9 Given the evidence available from the latest SNHP, 2014, the proposed approach the Council has set out in MM1 to Policy S1 will mean that an almost immediate review of the Local Plan following adoption would be required.
- 1.10 The inclusion of greater flexibility in the plan, through a combination of allocation of additional suitable sites in the more sustainable settlements and provision for reserve sites, is considered to be a more appropriate approach to dealing with the uncertainty associated with the new evidence from the HEDNA report. This approach is consistent with the recommendations of the Local Plan Expert Group.
- 1.11 As part of our submissions on behalf of Davidsons Developments, Western Range and Radleigh Homes, we have identified a number of sites in the larger sustainable settlements that the Council should consider as additional allocations or identification as reserve sites.