



SWC/LH/HG3140

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Chief Planning Officer  
North West Leicestershire  
Council Offices  
Whitwick Road  
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Dear Sir/Madam

**FURTHER INTERIM REPRESENTATIONS ON BEHALF OF WILLIAM DAVIS FOLLOWING PUBLICATION OF THE LEICESTER HOUSING MARKET AREA HEDNA REPORT AND RESPONSE OF NORTH WEST LEICESTERSHIRE COUNCIL**

This letter has been submitted on behalf of William Davis who wish to comment further on the publication of the HEDNA report relating to the likely housing and economic needs arising in the Leicester Housing Market Area outside those already considered in the generation of housing and employment land requirements in North West Leicestershire submitted Local Plan. It is requested that this letter be regarded as an interim response on behalf of William Davis to the HEDNA report and the company has added its name to the email sent recently to the Local Plan Inspector about the need for all parties to have more time to consider the implications of the HEDNA report on the North West Leicestershire Local Plan strategy and quantum of growth required. William Davis maintains its position that it aligns itself with the representations made by the HBF. The HBF further response on these matters contains many of the points that William Davis makes; however, it has some additional observations on the HEDNA conclusions and the potential implications for North West Leicestershire.

General Principles

As a starting point the company is concerned to ensure that the HEDNA report and its implications are debated in full on a comprehensive basis across the housing market area. The various assumptions made in HEDNA should be tested in detail at this Examination as this is the first opportunity for formal review of its figures, since no specific public participation or consultation of the findings will be taking place in any other forum. Whilst recognising that the planning process always has to respond to 'new evidence' on an ad hoc basis, it is clear that the re-opened session planned by the Inspector in March – whilst technically relating to the implications on North West Leicestershire – would inevitably have to discuss the rest of the housing market area to understand the context in which any additional housing within North West Leicestershire would affect other districts. It would be useful, therefore, if other districts affected by the HEDNA – who appeared to be present at various parts of the Examination – should make their position clear in relation to accepting or not additional housing that the HEDNA identifies. There should be an opportunity to challenge certain assumptions made in the HEDNA and its overall results.

Putting aside queries on the detailed methodology and hence specific OAN figures in the report, it is clear from the HEDNA that Duty to Cooperate issues are likely to arise between Leicester City and the rest of the districts within the Housing Market Area and North West Leicestershire clearly has capacity to assist in meeting a fair proportion of these unmet needs. Although the Council has indicated in its response that this 'flexibility' could amount to some 780 dwellings (on the basis of the suggested OAN

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for its district relative to current provision in the Plan), this figure is not substantial in the context of the level of potential unmet needs (which potentially equate to some 7610 dwellings in the period to 2031).

The fact that the HEDNA itself relates to both housing and economic development is particularly relevant to North West Leicestershire because one of the key objectives of the Local Plan – announced on the first day of the Examination – was to promote economic growth with particular emphasis upon Coalville being the driver of that growth. The district also benefits from the location of the rail freight terminal which is one of the most significant economic developments not just in the housing market area but in the region as a whole. Therefore, given the economic growth strategy in North West Leicestershire (which is not the same within other district housing market areas) it should be the case that North West Leicestershire should receive a relatively high proportion of any additional housing generated by the HEDNA report because of its physical location; its strategy for growth and the presence of the rail freight terminal.

Moving further from this general principle, it is clear that any additional housing that should come forward within North West Leicestershire should be concentrated in the location the Council wishes to promote as the economic driver of the district, ie Coalville. This has knock on effects for what William Davis has already said to the Examination about the need to concentrate more development at Coalville compared to Ashby and the inappropriate way in which the Council is seeking to define areas of separation within Coalville urban area without a proper assessment of the full scale of housing requirements in the future. The conclusions of the HEDNA report give weight to William Davis' arguments that have been made on these points already in that assuming further housing should be allocated to North West Leicestershire from the HEDNA report and that (in accordance with the Council's own strategy) a significant proportion of that should be at Coalville, the setting of tight areas of separation is, at best, premature.

#### Specific Issues Relating to HEDNA

William Davis' position in terms of the precise calculation of housing land requirements arising from the HEDNA is similar to those raised by the HBF. These include the following points:

1. The HEDNA report uses a similar methodology to the Council's district only assessment which we consider does not take robust account of either demographic change or worsening market signals, and makes insufficient adjustment to seek to uplift affordable housing provision. The HEDNA identifies a need of 3,980 affordable dwellings against a provision of 1,881 dwellings – a shortfall of over 2,000 dwellings in the Plan period.
2. There is an under-estimation in the HEDNA in relation to the housing arising from the economic activity expected at the rail freight interchange. The allowance that has been made for additional housing in the HEDNA of 50 dpa is much less than in the submitted Local Plan of 120 dpa. This must be tested in detail at the Examination as it is a fundamental difference and it is impossible to obtain a clear explanation from the information contained within the HEDNA. We agree with the HBF that at this stage it should be assumed that an additional allowance arising from the HEDNA related to the terminal should be made of at least a further 70 dpa to match that currently in the Local Plan – so a minimum of 1,400 dwellings (20 x 70) should be added to the HEDNA requirement.

The current proposals in the North West Leicestershire Local Plan are based on an annual housing requirement of 520 per annum. The HEDNA figures indicate a significant increase of 37% in the OAN (compared to the 2014 exercise which led to the 520 figure being arrived at) but still under-estimates OAN due to several erroneous assumptions. William Davis considers that on current evidence (which needs to be tested at examination) there is a case to increase North West Leicestershire housing requirements to take account of the 37% difference in baseline OAN figures; by at least a further 70 dwellings per annum reflecting the under-estimate for the economic activity related to the rail freight interchange and a similar amount for lack of appropriate allowance for affordable housing. William Davis agrees with the HBF that on the basis of the HEDNA OAN figure, North West Leicestershire does



not have a five year land supply, and that in the future the five year housing land supply position should be calculated based on the housing requirement in the final adopted Local Plan and not the OAHN figure from HEDNA.

The Council's response, therefore, to the HEDNA would not provide a level of housing during the Local Plan period that would be in accordance with the NPPF as it would neither meet objectively assessed need nor boost significantly the supply of housing in North West Leicestershire.

Recognising the procedural difficulties that exist, William Davis' suggests that the following approach be adopted. Firstly, the Inspector considers what an appropriate additional housing requirement arising from HEDNA should be allocated to North West Leicestershire. Secondly, to modify Policy S1 (as has been previously discussed at the Examination) with a view to one of the criteria being the requirement to either review the Plan or identify additional housing allocations to meet requirements emanating from the proper consideration of the HEDNA report immediately.

Proposed Modification to Policy S1 (for discussion)

The Council's proposed re-wording of Policy S1 provides no commitment that the appropriate level of housing arising from the HEDNA (as may be amended and distributed between district) will actually be committed in policy terms. William Davis was not invited by the Council to comment on its draft amendment to the policy, despite suggesting amendments originally (as per the 'Birmingham' example) and expressing an interest in being consulted. We consider that the suggested wording provides no effective trigger for review of the Plan in the event that an MOU is not agreed by the end of January 2018, and indeed that date could become meaningless in that situation. William Davis would suggest that the following additional element should be added to the policy:

*"In the event that redistribution requirements are confirmed but no MOU is agreed then the District Council will immediately commence a review of this Plan (or when it is shown that housing completions within the HMA as a whole fall to 10% beneath the HEDNA trajectory over two consecutive years)".*

In this context, it would therefore be wrong to specifically designate areas of separation (operating in the way which the Council contends) in Coalville until an appropriate long term housing requirement is defined.

William Davis would wish to participate in the further discussions about the re-wording of Policy S1 in the context of the HEDNA report and in the session arranged to discuss the relevant matters raised by the HEDNA report. William Davis would prefer more time to try and quantify the likely nature of the HEDNA requirements as they affect North West Leicestershire and Coalville in particular. It is hoped that the opportunity is given for a full and comprehensive debate on these matters. Without that, however, criticisms of the HEDNA itself and then the effects on North West Leicestershire may well be raised beyond this Local Plan Examination.

Yours faithfully  
for WYG

A handwritten signature in black ink, appearing to read 'Simon Chadwick', with a stylized flourish at the end.

**SIMON CHADWICK**  
Director