

NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL LOCAL PLAN PARTIAL REVIEW

ISSUE 2 – PROPOSED CHANGES TO POLICY S1

**ON BEHALF OF HALLAM LAND MANAGEMENT, HARWORTH GROUP,
JELSON, REDROW AND WILLIAM DAVIS (0034)**

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

- 1. Issue 2: Whether the proposed changes to Policy S1 are justified, effective and consistent with national policy and guidance?**
- 1.1 These submissions are made on behalf of Hallam Land Management, Harworth Group, Jelson, Redrow And William Davis (Representor ref: 0034) and should be read in conjunction with the submission made on their behalf to the Regulation 19 consultation on the Draft Partial Review in January 2020. That previous submission provides the context for the objections, whilst this hearing statement focuses on responding specifically to the Inspector's Matters and Issues.
- 1.2 Q1. For the sake of clarity Policy S1 should refer to the Substantive Review.
- 1.3 Q2. The whole purpose and rationale of the Partial Review is to try and ensure the Local Plan cannot be deemed to be out of date. In hindsight, the wording of the final paragraph of Policy S1 in the adopted NWL Local Plan is perhaps unfortunate and unduly onerous, but the proposed change to the policy in this Partial Review is doing nothing to help deliver the housing needs of the HMA; it is clearly ineffective.
- 1.4 Q3. Retaining the final paragraph of Policy S1 in the adopted Local Plan would allow arguments to be made that the plan is out of date. Such claims would need to be considered in the context of whether relevant policies are out of date, rather than the plan as a whole.
- 1.5 Q4. A consequence of Leicester City declaring a significant amount of housing need it is unable to provide for is the potential for the overall housing needs of the Housing Market Area (HMA) not being met. This housing need is immediate and the consequence of delay in providing for this need is to consign people and families in accommodation that is, at best, not suitable for their needs.
- 1.6 The long-awaited consultation on the draft Leicester Local Plan is now to be further delayed as a result of the coronavirus impact. Leicester City has declared a shortfall of 7,742 dwellings it is unable to provide for in the period to 2036. This shortfall is calculated on the basis of a purported housing supply of 21,362 dwellings over the plan period, but the ability to deliver this number of dwellings will need to be tested through the examination process, particularly as the City's SHELAA of 2017 identified land for a possible total of only 15,348 dwellings. The

quantum of unmet need to be provided outside of Leicester City could well therefore increase.

- 1.7 There is thus an urgent need to quantify Leicester's unmet housing need, to apportion this to other authorities in the HMA and via a sustainability appraisal, and to then include the additional housing as part of the clearly defined housing need requirement figures in the local plans of those HMA authorities that are to accommodate some of Leicester's needs.

Statement of Common Ground (SoCG)

- 1.8 The SoCG could represent an appropriate trigger for the submission of a replacement or substantive review plan, but this requires greater clarity and certainty than is presently the case, both in the SoCG itself and in the wording of Policy S1.
- 1.9 As highlighted in our submission on Issue 1, the SoCG presently submitted requires amendment to at least describe in more detail the mechanism for how Leicester's unmet is going to be met.
- 1.10 The SoCG will need to ensure a sustainability appraisal is undertaken in order to accord with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The sustainability appraisal will need to compare the preferred apportionment/distribution against reasonable alternatives, a process that will take time and could lead to an alternative distribution being required.
- 1.11 The SoCG requires updating now in order for the Council to comply with the duty to co-operate as part of this Partial Review in order for it to be considered effective. The SoCG should be updated to represent the one envisaged by the proposed changes to Policy S1 in the Partial Review and to include a joint commitment for each LPA to:
- Meet its own housing needs and a defined amount of Leicester's unmet need (with the exception of Leicester City);
 - Agree that the cumulative figure represents the housing requirement figure for the LPA;

- Acknowledge that an additional amount may be required for flexibility and to ensure deliverability; and
- Agree that should the housing requirement figure and/or the quantum of unmet need materially change, then a revised SoCG will be agreed within 6 months.

1.12 The SoCG will need to reference a sustainability appraisal of the apportionment of Leicester's unmet need, including considerations against the reasonable alternatives, prior to this being signed.

1.13 A consequence of the SoCG not being agreed is that the housing needs of the HMA will not be provided for. None of the partner authorities in the HMA should consequently be able to have their local plans found sound through their examination processes, as they will not be able to demonstrate that their plans are meeting the housing needs of the HMA.

1.14 The Partial Review as proposed weakens the effectiveness of the plan in seeking to ensure genuine housing needs are going to be met in NWL and across the HMA.