



NORTH WEST LEICESTERSHIRE LOCAL PLAN EXAMINATION

STATEMENT ON BEHALF OF WILLIAM DAVIS LIMITED

MATTERS 3 – HOUSING LAND REQUIREMENT

Issue A – Is the future housing requirement within the Plan a full OAHN?

As stated in the August 2016 representations, William Davis does not consider that the housing requirement defined within the Plan to be either derived properly from OAHN from an appropriately defined HMA nor ultimately does it result in the ability of the Local Plan to meet the requirements in NPPF paragraph 47 to boost significantly the supply of housing.

The SHMA which the Council is using as the basis for its calculations was done in 2014 and has recently been regarded as out of date in the planning appeal decision ref. APP/G2435/W/15/3005052. The HMA authorities have recognised that more up to date and full assessment be made of housing land requirements through the HMA as a whole via the commissioning of the HEDNA report. In theory the results of this report would mean the Council could comply with the requirements of the NPPF although there would clearly need to be a debate about the interpretation of the conclusions of the HEDNA. This should be carried out through ideally a re-convening of the Local Plan Examination as it is understood that the results of the study have already been received by the Council or are shortly to be so.

The requirements of the NPPF in paragraphs 47 are clear on this point and the Local Plan fails against the tests in this paragraph and indeed paragraph 159 where the Local Plan is required to "meet household and population projections taking account of migration and demographic change".

William Davis also queried in its August 2016 letter whether the Local Plan would effectively meet the paragraph 47 requirements for Councils to identify developable sites or broad locations for growth through the Local Plan process for years 6 to 10 and where possible years 11 to 15. Even on the current timeframe for the adoption of the Plan there would be less than 15 years to run to 2031. Would it not be better for the Council to review the results of the HEDNA and then lengthen the time period of the Local Plan to perhaps 2036?

Issue B – Adjustments to the OAHN

William Davis has considered its position on these matters following the August 2016 letter and also in the interests of brevity has, as members of the HBF, discusses these matters with the Federation. They have had sight of the further representations the HBF has submitted to the Examination on these points and wishes to align itself with the points the HBF make. However, on certain specific matters William Davis has concerns relating to:

1. The lack of use of up to date population household projection figures – the SHMA of 2014 used 2012 projections which were not applied across the whole of the HMA. 2014 projections are available and should be used and there appears to be considerable growth in households comparing the 2012 and 2014 projections. The Inspector should recommend to the Council that it reconsiders its calculations using the up to date data.
2. William Davis agrees with the HBF position on headship rates and affordability.
3. Market signals – William Davis agrees that in situations where there may be a worsening trend in any of the market signal indicators (see NPPG) the Council should consider making an upward

adjustment to planned housing numbers. This in combination with potentially greater household formation rates is strong evidence that the housing requirement figures the Council is using over the period to 2031 is likely to be an under-estimate. The Council also needs to take account of potential economic growth generated from the strategic rail freight interchange. Whilst there appears to have been some allowance for that significant development and the likely housing generated from the economic growth proposed on that site (Issue C), the wider impact on the HMA has not been accounted for.

Thus as explained further by the HBF, the Council's housing requirement calculations do not accord with NPPF and NPPG aside from any more general national policy objectives requiring housing supply to be boosted in accordance with NPPF paragraph 47.

William Davis made suggestions in terms of how requirements should be changed to reflect the potential lengthening of the Local Plan period; however further assessments would need to be made by the Council and then referred back through the Examination process to ensure these other factors are taken into account.