



LOCAL PLAN

Ref:

(For official use only)

Publication Stage Representation Form

North West Leicestershire Local Plan Proposed Submission

Please return this form to North West Leicestershire District Council either by post:

Planning Policy, North West Leicestershire District Council, Council Offices, Whitwick Road, Coalville LE67 3FJ or email planning.policy@nwleicestershire.gov.uk no later than **5pm on 15 August 2016**.

This form has two parts-

Part A – Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

2. Agent Details

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details for the agent in 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text"/>
Organisation <i>(Where relevant)</i>	Hallam Land Management Ltd	Sigma Planning Services
Address Line 1	Banner Cross Hall	Sigma House
Line 2	Sheffield	6 Garden Street
Line 3	<input type="text"/>	Tunbridge Wells
Line 4	<input type="text"/>	Kent
Post Code	S11 9PD	TN1 2XB
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address <i>(Where relevant)</i>	<input type="text"/>	<input type="text"/>

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Policies Map

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

- | | | |
|--|------------------------------|-----------------------------|
| i) Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| ii) Sound | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| iii) Complies with the
Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The proposed Policy H6 is supported but the dwelling mix promoted by the SHMA is misleading in suggesting that 80 – 90 % of new market dwelling should be 2 or 3 bedrooms. The dwelling mix for market housing set out in Table 4 where 78 % are 3-4 bedroom dwellings is more representative of market demand. Often purchasers who only need 2 or 3 bedrooms prefer to buy a home with an extra bedroom and this may explain the lack of reality in the SHMA mix. Developers must, however, build to suit the market for their product and this will include a larger proportion of 3 and 4 bedroom properties.

(Continue on a separate sheet/expand box if necessary)

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Re-word the guidance with regard to housing mix to place greater emphasis upon ensuring that housing mix is compatible with local market requirements utilising the experience and expertise of local property professionals and developers. This is preferable to relying upon a simple demographic statistical approach in the SHMA which is far too simplistic and does not take account of the preferences of individual purchasers and tenants of housing.

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LOCAL PLAN

Representation 44
44/11/1F5/0.

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The policy of continued promotion of the re-opening of the Leicester to Burton rail line is supported. Financial contributions from new housing development at Ashby should be secured in order to enhance its practicality and to improve the sustainability of the existing and new development. New housing allocations to the south of the town within walking distance of the station should form part of the plan's proposals for a balanced and sustainable development of the town of Ashby.

(Continue on a separate sheet/expand box if necessary)

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Add a provision within Policy IF5 that contributions to the cost of providing the rail connection will be required from new development allocations at Ashby.

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Representor 44

44/12/S1/55-
5.8/0.



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The housing provision figure is inadequate. Research carried out by DLP in September 2014 (copy attached) indicates that the housing need should reflect a range of employment-led forecasts which suggest a level of between 510 and 651 dwellings per annum. Although the proposed figure of 520 dwellings per annum falls within this range, Government policy is that in order to boost significantly the supply of housing, figures at the upper end of the range should be selected. The housing provision figure should therefore be 13,020 over the plan period (651 dwellings per annum). This is also required because in the past household formation rates have been suppressed by under-supply in the District and affordability of housing has worsened. The assessment will therefore have to reflect the consequences of past under-delivery of housing (PPG 1D 2A-015). A contributory factor to the past failure to deliver housing numbers has been the focus upon Coalville rather than Ashby de la Zouch as the location for strategic housing allocations. This fails to have proper regard to market conditions. The increase in housing numbers that is required now will also have to be associated with a revised spatial strategy which directs more housing to areas of strongest market demand, thereby ensuring delivery of the housing numbers that are needed.

(Continue on a separate sheet/expand box if necessary)

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Increase the housing provision figure in Policy S1 to 13,020 dwellings (651 dwellings per annum).

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44/1/42/10



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The proposed Policy H2 is meaningless in planning policy terms. It simply informs about the administrative process. It does not add anything to the plan and should be deleted.

(Continue on a separate sheet/expand box if necessary)

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Delete Policy H2.

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Representation 44
44/2/51/5-4/10



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The amount of employment development proposed is inadequate to meet projections that indicate that the local labour force will grow by 247 to 435 jobs per annum (Experian). This is a range of 4,940 to 8,700 jobs over the plan period requiring 85 to 150 hectares of land for employment. The selection of 96 hectares is within the range but is towards the bottom end. The plan should aim towards a figure at the higher end to ensure that land supply is not a constraint on job growth, particularly where the main employment uses are in the storage and distribution category where greater areas of land are required. East Midlands Airport is a nationally and internationally important facility and its expansion should be encouraged and not constrained by any restriction on employment land requirements.

(Continue on a separate sheet/expand box if necessary)

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The employment land provision in Policy S1 should be increased to 150 hectares.

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Date:



Strategic Planning & Research Unit

For and on behalf of
Hallam Land Management

Objectively Assessed Need for Housing in North West Leicestershire
Re: Preparation of the North West Leicestershire Local Plan

Prepared by

**Roland G Bolton
Strategic Planning Research Unit
DLP Planning**

September 2014

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Strategic Planning & Research Unit

1.0 INTRODUCTION

- 1.1 This representation has been prepared by the Strategic Planning & Research Unit of DLP Planning Ltd on Hallam Land Management in response to North West Leicestershire's Local Plan Stage 1 public consultation (September 2014).
- 1.2 The Council are seeking the views of residents, landowners and developers about the sorts of policies that may be needed in order to guide the future development of the district.
- 1.3 It is suggested in the initial document that the Council have published that between 285 – 350 homes are required per annum in North West Leicestershire between 2011 and 2031. This would give a total of 5,700 – 7,000 dwelling over the 20 year plan period. This is not considered a robust or justified housing target for the district and the consultation document itself outlines that this *"may not be the final housing figures for our Local Plan"*.
- 1.4 The purpose of these representations made in this document is to identify that a substantially higher number of houses are required to be planned for in the North West Leicestershire's Local Plan in order for it to be justified and in accordance with national planning policy as set out in the National Planning Policy Framework (the Framework).
- 1.5 While the Consultation Document requests comment on the list of the matters the new Local Plan should include or exclude it is important that the starting point for the housing requirement is robust. It is this matter in respect of the making sure enough homes are provided and planned for in the Local Plan that is dealt within these representations.

Summary of Objectively Assessed Need for housing

- 1.6 I consider that the **Objectively Assessed Need (OAN) for housing** in North West Leicestershire **is between 510 and 651 dwellings a year** reflecting the recent Experian employment forecasts of 327 to 515 jobs a year which would require the local labour force to grow between 247 to 435 persons a year taking into account a reduction in unemployment.

Strategic Planning & Research Unit

1.7 The higher projection is based upon the same Experian projection in table 20 of the Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) 2014 (GL Hearn) of 515 jobs a year 2011 to 2031 but results in a higher dwelling requirement for the following reasons:

- a. I have not redistributed the growth projected by Experian to occur within the district to other districts as proposed by GL Hearn. My reasons for rejecting this approach is that:
 - i. the projection itself identifies the growth occurring within the district due to the nature and type of industries that exist within the district
 - ii. the reason given for redistribution of growth away from North West Leicestershire (paragraph 5.54) is the inability of the district to accommodate past growth trends. This assumption is not supported by
 1. the emerging policy context which continues to support employment growth in the district (SEP's Flagship Proposal 21 focuses on delivering investment and jobs across five Growth Areas and four Transformational Priorities including East Midlands Airport and the Coalville to Ashby Growth Corridor).
 2. the significant employment proposals currently being promoted in the district.
- b. I do not consider that the increase levels of in commuting assumed in the GL Hearn approach are sustainable.
- c. I consider that the Framework requires that objectively assessed housing needs should be met in full and therefore using the lower rates of need in the period 2031 to 2036 to reduce the level of housing required in the next five years would be contrary to the principles of the framework.
- d. I have utilised more optimistic household representation rates in order to reflect the Frameworks requirement to widen housing choice.
- e. I have made an allowance to reduce unemployment but not for a general increase in the activity rate of the population.

Strategic Planning & Research Unit

- 1.8 I have attempted to assess the impact of each of these assumptions although given their inter-dependency this may only be regarded as a guide to the scale of impact of each assumption:

Table 1 Explanation of differences between Experian 2013 based projections

	Dwellings	Jobs	Dwellings %	Source
SPRU Experian 2013	651	515		
Increasing time period to 2036	28		9%	Difference between tables SHMA 21 and 22
Increasing in commuting by continuing existing commuting ratio	120	107	40%	SHMA Paragraph 5.50
Redistribution of growth to other areas	106	142	35%	Difference between PROJ 3 and PROJ 4
Other - including assumptions regarding headship rates and activity rates	47	20	16%	
SHMA 2011 – 2036	350	246		

- 1.9 I note that a previous Inspector has rejected both the council's evidence produced by GL Hearn and that produced by Barton Wilmore (The Leicester and Leicestershire Strategic Housing Market Area Objective Assessment of Housing Need June 2014) on the grounds that one or both are significantly in error.
- 1.10 In simple terms difference for North West Leicestershire is that the GL Hearn approach is one that discounts a job forecast of over 12,000 to just 6,000 jobs where as conversely the Barton Wilmore takes a lower projection but then adds the job growth implied by the Strategic Economic Plan. The Barton Wilmore approach is in accordance with paragraph 158 of the framework. The resulting dwelling projections are therefore based on very different job growth assumptions.

Strategic Planning & Research Unit

Table 2 Comparison of projected level of employment and housing growth in North West Leicestershire between Barton Wilmore and GL Hearn Reports

Source	Ave annual Jobs	Ave Annual Dwellings
PROJ 4 (Experian job-led – HMA level) Figure B65: Summary of projections 2011 to 2036 The Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) 2014 (GL Hearn 2014)	246	352
Table 5.2: Distribution of LEP Jobs Leicester and Leicestershire Strategic Housing Market Area Objective Assessment of Housing Need (Barton Wilmore June 2014)	835	836

- 1.11 On its own terms the GL Hearn report does not purport to quantify the full objective assessment of housing need as it has not sought to integrate the employment policies as set out by the LEP with the level of housing provision (paragraph 9.30). The report clearly identifies this as additional work that is required to be undertaken stating:

'The alignment of policies for housing, employment and other land uses is a relevant consideration (as set out in Paragraph 158 in the NPPF) in the development of local plans and needs to be considered as the strategy for development is progressed.'

- 1.12 This clear recognition that further work is required, together with the shortcomings in the underlying assumptions in the GL Hearn work that I have already identified, would lead me to agree with the previous inspectors approach that little weight maybe attributed to this report.
- 1.13 In respect of the Barton Wilmore work this clearly attempts to address the requirements of paragraph 158 and as such should be attributed some weight.
- 1.14 On balance the approach that I have set out would appear to be the most robust in the current context.
- 1.15 To conclude the evidence of employment growth, both in terms of projections but also in terms of policies and proposals, supports continued strong employment growth within the district. The objectively assessed need for housing should reflect this and I am therefore of the opinion that the dwelling requirement should be set at the top of the range I have calculated at 651 dwellings a year (based upon 515 jobs a year in the Experian 2013 projection in the 2014 SHMA).

Strategic Planning & Research Unit

1.16 I have attempted to clearly explain the different approaches that have been presented in terms of the objectively assessed housing need. I consider that the range I suggest for the full objectively assessed need of between 510 and 651 dwellings a year may well prove to be conservative.

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2.0 NATIONAL PLANNING POLICY FRAMEWORK

- 2.1 This representation is intended to set out what may be considered objectively assessed needs for market and affordable housing are for the North West Leicestershire District Council area. The National Planning Policy Framework (the Framework) identifies in paragraph 14 that the golden thread of sustainability for plan-making means that
- local planning authorities should positively seek opportunities to meet the development needs of their area;
 - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.
- 2.2 The Framework goes on to identify that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period as per paragraph 47. The Local Plan must take this into account as it is being prepared.
- 2.3 For this report the Chelmer Model has been operated by Roland Bolton who has had over 20 years' experience in using the model and presenting its results at Examinations and Inquiries to help establish and examine the appropriate OAN.
- 2.4 The Framework requires that:
- a. planning should proactively drive and support sustainable economic development to deliver the homes that the country needs. The Framework requires that every effort should be made, objectively, to identify and then meet the housing needs of an area and take account of market signals (such as land prices and housing affordability), and set out a clear strategy for

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allocating sufficient land which is suitable for development in the local area, taking account of these needs (paragraph 17);

- b. Local Authorities should significantly boost the supply of housing (paragraph 47);
- c. housing applications should be considered in the context of the presumption in favour of sustainable development and that policies regarding the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (Paragraph 49);
- d. the evidence base for the objective assessment of housing needs should be adequate, up to date and relevant (paragraph 158) and include Strategic Housing Market Assessments (SHMA) for the whole of the housing market area taking into account household and population projections including migration and demographic change (paragraph 159); and
- e. the objectively assessed need for housing has to be determined prior to applying any constraints or engaging the Duty to Cooperate (paragraphs 152 and 179).

The Approach to Objectively Assessed Need in the Framework

- 2.5 In determining the objectively assessed need for housing, the Framework requires that this should be based upon a consideration of demographic projections and trends (para 159) as well as meeting demand. The assessment also needs to consider the needs of the economy so that planning is not an impediment to sustainable growth (paragraph 19).
- 2.6 Local planning authorities are required to ensure that their assessment of, and strategies for, housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals (para 158).
- 2.7 The Framework sets out a clear process for local authorities to follow to set a housing requirement for their local plan. The first is to produce a SHMA to assess the full needs for the Housing Market Area (paragraph 159) this should:

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- a. Meet projected needs taking account of migration;
 - b. Assess needs for all types of housing;
 - c. Provide the scale of supply to meet housing demand.
- 2.8 The Framework then sets out how to proceed from establishing this objectively assessed housing need to determine the housing requirement. This second part of the procedure consists of three stages these being:
- a. To test alternative strategies to meet this need in full (paragraph 152) including working with other authorities to meet these needs across local authority boundaries (paragraph 179);
 - b. consideration of measures to mitigate negative impacts if these are unavoidable (paragraph 152);
 - c. consideration of compensatory measures where mitigation measures are not possible (paragraph 152).
- 2.9 A fuller explanation of the interpretation of the Framework with regard to the Objective Assessment of the Need for Housing is set out in the National Planning Policy Guidance.
- National Planning Policy Guidance**
- 2.10 In respect of the calculation of the five year housing land supply the Guidance states (Paragraph: 030 Reference ID: 3-030-20140306) that the starting point for the five-year housing supply should be the housing requirement figures in up-to-date adopted Local Plans and that considerable weight should be given to the housing requirement figures in adopted Local Plans.
- 2.11 The Guidance goes on to warn that evidence which dates back several years, such as that drawn from revoked Regional Strategies, may not adequately reflect current needs.
- 2.12 In such circumstances where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, then the Guidance suggests that the following should be considered:
- a. Information provided in the latest full assessment of housing needs.

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- b. Where there is no robust recent assessment of full housing needs, the household projections published by the Department for Communities and Local Government should be used as the starting point.
- 2.13 In both cases the weight given to the above should take account of the fact that they have not been tested (which could evidence a different housing requirement to the projection, for example, because past events that affect the projection are unlikely to occur again or because of market signals) or moderated against relevant constraints (for example environmental or infrastructure).
 - 2.14 The Guidance states that the definition of need requires the identification of the scale and mix of housing and should cater for the housing demand of the area, identifying the scale of housing supply necessary to meet that demand.
 - 2.15 The assessment of development needs should be proportionate and include those future scenarios that could be reasonably expected to occur.
 - 2.16 Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints.
 - 2.17 Local planning authorities are required to assess their development needs working with the other local authorities in their relevant housing market area or functional economic market area in line with the Duty to Cooperate.
 - 2.18 Where Local Plans are at different stages of production, local planning authorities are required to co-ordinate future housing reviews so they take place at the same time.
 - 2.19 The starting point for the Objective Assessment of Housing Need is the Household projections published by the Department for Communities and Local Government. The Guidance highlights that these are trend based and do not predict the impact that future government policies, changing economic circumstances, or other factors, might have on demographic behaviour. As such the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example:

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- a. Household formation rates may have been suppressed historically by under-supply and worsening affordability of housing - the assessment will therefore need to reflect the consequences of past under delivery of housing.
 - b. Unmet housing need - evidence of the extent to which household formation rates are or have been constrained by supply will need to be taken into account.
- 2.20 Local needs assessments should be informed by the latest available information and a meaningful change in the housing situation should be considered in the context of the requirement for the Local Plans to be kept up-to-date.
- 2.21 The Guidance states that in respect of the most recent 2011-based Interim Household Projections, these only extend to 2021, so plan makers would need to assess likely trends after this date.
- 2.22 The Guidance confirms that the household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions but suggests that plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Such testing should take into account the most recent demographic evidence including the latest Office of National Statistics population estimates.
- 2.23 The Guidance requires that changes from the DCLG projections are to be clearly explained and justified on the basis of established sources of robust evidence.
- 2.24 The Guidance further requires that consideration must be given to whether the DCLG projections are appropriate on issues such as:
- a. Migration levels;
 - b. Demographic structure that may be affected by local circumstances or policies;
 - c. Employment trends - in such circumstances where the supply of working age population that is economically active (labour force supply) is less than the projected job growth plan makers will need to consider how the location of new

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housing or infrastructure development could help address these problems
(Paragraph: 018 Reference ID: 2a-018-20140306)

- d. Market signals - the housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand. Relevant signals may include the following:

- i. Land Prices
- ii. House Prices - longer term changes may indicate an imbalance between the demand for and the supply of housing.
- iii. Mix adjusted house prices (adjusted to allow for the different types of houses sold in each period) measure inflation in house prices.
- iv. Rents - the Office for National Statistics publishes a monthly Private Rental Index.
- v. Affordability - the Department for Communities and Local Government publishes quarterly the ratio of lower quartile house price to lower quartile earnings by local authority district.
- vi. Rate of Development - if the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan.
- vii. Overcrowding - the number of households accepted as homeless and in temporary accommodation is published in the quarterly Statutory Homelessness release.

2.25 In respect of market signals, plan makers should not attempt to estimate the precise impact of an increase in housing supply but should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period.

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- 2.26 In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.
- 2.27 Any cross-boundary migration assumptions, particularly where one area decides to assume a lower internal migration figure than the housing market area figures suggest, will need to be agreed with the other relevant local planning authority under the Duty to Cooperate. Failure to do so will mean that there would be an increase in unmet housing need.

Conclusion on Approach to the Objectively Assessed Need for Housing

- 2.28 I would argue that the Framework and Guidance provide an appropriate background against which to approach the choice of assumptions as part of the objective assessment of needs for housing.

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3.0 BACKGROUND TO THE EMERGING LOCAL PLAN

The revoked East Midlands RSS

- 3.1 The evidence base for East Midlands Regional Spatial Strategy housing policies dates from the 2004 household projections. This evidence is out of date and it is no longer appropriate to place weight on these projections. The RSS requirement was 510 dwellings per annum mainly at Coalville including sustainable urban extension if necessary.
- 3.2 The approach in the RSS was justified by reference to the insufficient urban capacity of Leicester to meet all the proposed provision to 2026 (RSS paragraph 4.2.27).

The Withdrawn Core Strategy

- 3.3 The Core Strategy and associated documents were submitted to the Secretary of State on 24 June 2013.
- 3.4 In paragraph 7.5 the CS stated:

'Ashby de la Zouch is particularly suitable as it has a good range of services and facilities with a town centre that is highly regarded by shoppers. House prices are relatively high and current values have been maintained in a generally declining property market, however affordability in the town is poor.'

- 3.5 Policy CS15 (*Distribution of Housing*) stated:

'We will allocate sufficient land to ensure the overall housing provision of at least 9,700 dwellings over the period 2006-2031. This development will be distributed as follows:

- **Coalville Urban Area** at least 4,950 dwellings
- **Ashby de la Zouch** at least 1,400 dwellings
- **Castle Donington** at least 1,300 dwellings
- **Ibstock** at least 550 dwellings
- **Kegworth** at least 450 dwellings
- **Measham** at least 550 dwellings
- **Sustainable Villages** at least 500 dwellings'

- 3.6 The Planning Inspector in his "Initial Note" 9 July 2013 identified his serious concerns regarding soundness and / or legal compliance of the plan. The Council provided the Inspector with a response on 16 July 2013 and the Inspector responded on 25 July 2013 stating that he continued to be seriously concerned about:

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- The assessment of the need for housing;
 - The supply of land for housing; and
 - Whether the Council is likely to be able to demonstrate that it has complied with the Duty to Cooperate.
- 3.7 Notwithstanding these concerns the Council asked the Inspector to proceed to the Exploratory Meeting which was held on 25 September 2013.
- 3.8 At this meeting The Council maintained the view that the most up-to-date evidence of housing need was provided by the Leicester & Leicestershire Housing Requirements Project (LLHRS).
- 3.9 In terms of the forthcoming Strategic Housing Market Assessment (SHMA), the Council stated that if the SHMA suggested a higher housing requirement then the Council was committed to a review.
- 3.10 In the note of the Exploratory Meeting the Inspector stated that the 2007/8 Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) did not appear to reflect recent market conditions and did not cover the full Plan period to 2031. In the absence of an up-to-date SHMA, he concluded it would be difficult to ascertain that the CS met the Framework's soundness requirements - that a Plan should be justified and consistent with national planning policy.
- While the Leicester and Leicestershire Housing Requirements Study (LLHRS) informed the Plan's housing target figure, it is on its own terms only one of a number of factors to be considered in setting a housing target (Exploratory Meeting Note paragraph 2.3).
 - The LLHRS suggested an overall target for the housing market area that was similar to (or higher than) the previous East Midlands Regional Plan (RS) requirement. Yet the Core Strategy is planning for a markedly lower rate of housing delivery than the RS. Taken together, these factors suggest concern that there may be a shortfall of provision in the housing market area as a whole (Exploratory Meeting Note paragraph 2.3).
- 3.11 This concern has been raised by a number of other planning authorities in the housing market area (Exploratory Meeting Note paragraph 2.3).
- 3.12 The Council's view that any shortfall should be accommodated 'elsewhere in the housing market area' (para 3.32 of the Council's letter of 16 July 2013) was not

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supported by any agreement with other councils. It is therefore difficult to properly assess how the CS's housing proposals relate to the housing market area as a whole (Exploratory Meeting Note paragraph 2.3).

3.13 The Inspector also noted that while the Council is experiencing a substantial shortfall in housing land supply it was proposing no allocations to address this. He suggested that this appeared contrary to the principle of a plan-led system set out in the Framework. He reemphasised the expectation that Local Plans should seek to meet objectively assessed needs and that if there was a shortfall of sites then the Council should consider allocating new ones. (Exploratory Meeting Note paragraph 2.6).

3.14 The Inspector further commented (Exploratory Meeting Note paragraph 2.10) that, as the evidence suggested a continuing housing land supply shortfall; paragraph 49 of the Framework meant that relevant policies for the supply of housing in the submission CS could not be considered up-to-date. In such circumstances the Inspector stated that it would be difficult to conclude that the CS was sound.

3.15 In response to the Inspectors letter a report was considered at Full Council on 29th October 2013 and in respect of the issue of housing provision the report stated (paragraph 2.13):

'However, it should be appreciated that whilst other plans across the HMA have used the housing requirements in the Regional Plan this was at a time when the Regional Plan remained in force. Indeed, earlier this year the Melton Core Strategy was considered to be not sound in terms of housing requirements based on the Regional Plan and the Inspector in that case had referred to more up-to-date evidence in the LLHRS. Therefore, there is no guarantee that even had the Council decided to use the higher figure from the Regional Plan that the outcome would have been any different.'

3.16 In paragraph 4.6 of the officers report it highlights the agreement to commission a joint SHMA for the Leicester & Leicestershire Housing Market Area (HMA) and that there will be initial results in respect of future housing requirements for the HMA and individual authorities available by the end of February and other information by late April 2014.

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3.17 The issue of unmet housing need is referred to in paragraph 4.7 which suggests, in the Officers opinion, that it is possible (but not likely) that some of the needs identified for individual districts will not be capable of being met within those districts. The report goes on to state that were this occurs there will need to be a dialogue and agreement amongst the HMA authorities regarding both the housing requirement for the overall HMA and the distribution of development between districts. The report states that it will be essential to undertake this process in order to demonstrate that the Duty to Cooperate requirement has been complied with.

3.18 In response to this report a Full Council meeting on 29th October 2013 resolved that:

'That the North West Leicestershire Local Plan Core Strategy be withdrawn in accordance with Regulation 27 of the Town And Country Planning (Local Planning) (England) Regulations 2012; and that work continues on the Core Strategy with a view to re-submitting as soon as is practicable.'

The Leicester and Leicestershire Housing Requirements Project (LLHRS)

3.19 This is the document referred to by the Inspector as the Leicester and Leicestershire Housing Requirements Study (LLHRS) 2011. Given the findings of the Examination Inspector regarding the utility of this study little weight may be attached to its findings. The overall summary, however, is set out in the following Tables 3 and 4.

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Table 3 The Leicester and Leicestershire Housing Requirements Study: Summary of projections 2006 to 2031 – total – Leicester and Leicestershire

	Projection	Population growth		Housing numbers		Employment growth	
		Total	% change	Total	% change	Total	% change
PROJ 1	(trend-based)	187,881	20.2%	112,738	29.4%	53,505	11.5%
PROJ 2	(zero net-migration)	103,519	11.1%	78,594	20.5%	5,352	1.2%
PROJ 3	(zero employment growth)	85,743	9.2%	70,682	18.4%	0	0.0%
PROJ 4	(5% employment growth)	128,390	13.8%	88,043	22.9%	23,252	5.0%
PROJ 5	(10% employment growth)	171,037	18.4%	105,404	27.4%	46,505	10.0%
PROJ 6	(past build rates)	118,337	12.7%	84,150	21.9%	17,841	3.8%
	ONS/CLG projections	201,784	21.7%	115,723	30.1%		

- 3.20 In respect of the Housing Market Area it is clear that the work fails to meet the Framework requirement of significantly increasing the supply of housing as all of the projections are below the ONS/CLG projections. There is little explanation as to why this is the case.
- 3.21 In paragraph 34 of the executive summary the study concludes that a provision of between 4,000 – 4,500 homes per annum would represent a positive planning framework which would ensure that housing provision did not constrain the ability of the sub-region's economy to achieve a level of economic growth above the baseline forecast.
- 3.22 The results for the district do not provide a comparison with the DCLG projections however the 2008 based projections referred to in the Study suggest a dwelling requirement of approximately 360 dwellings a year, so like the outcomes of the HMA as a whole the Study's projections with the exception of the 10% employment growth scenario project lower levels of dwelling requirement than the most up to date Household projections at that time.

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Table 4 The Leicester and Leicestershire Housing Requirements Study: Summary of projections 2006 to 2031 – annual - North West Leicestershire

	Projection	Population growth		Housing numbers		Employment growth	
		Total	% change	Total	% change	Total	% change
PROJ 1	(trend-based)	611	0.7%	352	0.9%	136	0.3%
PROJ 2	(zero net-migration)	113	0.1%	155	0.4%	-143	-0.3%
PROJ 3	(zero employment growth)	369	0.4%	256	0.7%	0	0.0%
PROJ 4	(5% employment growth)	536	0.6%	322	0.8%	93	0.2%
PROJ 5	(10% employment growth)	703	0.8%	388	1.0%	187	0.4%
PROJ 6	(past build rates)	621	0.7%	356	0.9%	141	0.3%

Source: The Leicester and Leicestershire Housing Requirements Study GL Hearn : Figure A3.55:

- 3.23 In paragraph 8.4 the study states that in clarifying what could be regarded as an objective assessment of development needs, local authorities should consider what level of economic growth is realistic to plan for in their areas and that the economic development strategies of local authorities and the Local Enterprise Partnership are relevant considerations. The baseline forecast referred to in the Study (paragraph 8.7) is for 5.9% employment growth over the 2006-31 period.
- 3.24 I note that the study is clear that further consideration is required to establish what may be considered to be a realistic level of economic growth as part of determining the objectively assessed need for housing (LLHRS paragraph 8.8).
- 3.25 As with the assumptions regarding migration, I consider the appropriate level of economic growth in the next sections.

The Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) 2014

- 3.26 Prior to the publication of this document I attended a stakeholder meeting, along with Mr Edgar of SPRU, regarding the approach adopted. During discussion at these meetings I highlighted the following potential concerns based upon my experience of similar approaches being considered unsound by Inspectors at Development Plan

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Examinations, including Aylesbury Vale, where the evidence base had been produced by the same consultancy. The issues raised were:

- the use of the ONS adjustments to past Mid-Year Estimates to adjust future projections (generally downwards). This approach by the same consultants was rejected by the Inspector at the Vale of Aylesbury Core Strategy;
- the approach to modelling the future labour force and assumptions regarding unemployment, activity rates and commuting.

3.27 A summary of the key findings from this report are as follows:

Table 5 Summary of outcomes from the Leicester and Leicestershire SHMA (GL Hearn 2014)

Projection	Dwellings	Jobs	Period	Source
Jobs led Experian 2013	478		2011 – 2031	Table 21
2011 SNPP midpoint headship rates	323		2011 – 2031	Table 25
2011 SNPP with 2008 tracking headship rates	355		2011 – 2031	Table 25
PROJ 3 (Experian job-led – LA level)	451	451	2011 – 2036	Figure B65.
PROJ 4 (Experian job-led – HMA level)	352	246	2011 – 2036	Figure B65

3.28 The highest projection is the Jobs Led forecast based upon the growth rates suggested by the Experian 2013 economic projection for the district and is effectively the same as PROJ 3 but for the period to 2031.

3.29 The report concludes that there is a case for higher levels of housing provision to meet affordable housing needs (paragraph 9.14) and to support economic growth (paragraph 9.17).

3.30 In paragraph 9.22 the report states that the consultants consider the housing need over the 2011-31 period would fall between 3,775 – 4,215 homes per annum across the HMA and table 84 provides the breakdown of these figures to a local authority level. This highlights the Objectively Assessed Need for North West Leicestershire to be between 285 and 350 dwellings. Of these some 209 dwellings are required for affordable housing (table 85).

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3.31 I consider there to be a number of assumptions within the consultant's approach that are required to be understood before one utilises its findings or applies weight to them in any decision. These are explained below.

Projection period

3.32 In all of the projections the demand for housing is projected to fall off in the last five years of the projection period (2031 to 2036). This means that by averaging housing need over the period to 2036, especially for the purposes of calculating 5 year land supply, the projection underestimates the level of requirement in the early part of the period.

Unattributable Population Change

3.33 In paragraphs 5.23 to 5.38 the report makes the case for using unattributable population change for amending migration. While in this case the adjustment for North West Leicestershire is to suggest an increase in migration it has to be highlighted that such adjustments have been rejected by Inspectors at examination (such as Aylesbury Vale Inspectors letter paragraph 35) and have been considered and rejected by the ONS in the production of the 2012 based SNPP's.

3.34 This is a somewhat academic debate in a location where the requirement to integrate housing and economic strategies results in a higher level of dwellings than suggested by the demographic led forecasts as is the case here.

Household Formation Rates

3.35 In paragraphs 5.36 to 5.45 the SHMA considers the appropriate approach to take towards the formation of new housing. The selected approach "mid-point headship rates" means that for the period to 2031 there would be some 640 fewer households than if the 2008 household formation rates were applied (table 25: 355 – 323) x 20).

3.36 In addition, Figure 21 illustrates that at 2031 the average household size would be 2.35 compared to just over 2.25 if there had not been a sustained undersupply and recession. In terms of a projected population of 58,159 (SHMA Figure B63) this is a difference of about 1,000 households not forming within the district (24,748 compared to 25,848).

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- 3.37 I recognise that adjustments are required to the 2011 Interim household projection household representation rates and my assumptions are set out later in this report.

Employment led projection – Alignment with Local Enterprise Partnership

- 3.38 I note in paragraph 9.17 that the report suggests that there is a case for higher levels of provision based upon supporting economic growth.
- 3.39 The report identifies that while it has used trend based economic projections (Experian forecasts prepared in autumn 2013 paragraph 5.47) it does not seek to align the objective assessment of need for housing with the councils economic plans for the area as expressed in the Strategic Economic Plan published by the Leicester & Leicestershire Local Enterprise Partnership (LEP). The consultants clearly highlight that this is a further stage of the process that has not been undertaken:

*'9.30 The assessment also does not take account of local policies for economic growth. The Leicester & Leicestershire Local Enterprise Partnership (LEP) has published its Strategic Economic Plan. This identifies five growth areas within which there are four transformational priorities. The priorities are Leicester Launchpad (6,000 jobs), East Midlands Gateway Strategic Rail Freight Interchange (7,000 jobs), Loughborough University Science & Enterprise Parks (4,000 jobs) and MIRA Technology Park (2,000 jobs). The SEP is a bidding document and is not specifically assessed within the SHMA. **The alignment of policies for housing, employment and other land uses is a relevant consideration (as set out in Paragraph 158 in the NPPF) in the development of local plans and needs to be considered as the strategy for development is progressed.***

- 3.40 This recommendation clearly reflects the consultants recent experience at Aylesbury Vale where the inspector considered that the level of housing being supported by the consultants was unsound on the following grounds:

'37. The Plan seeks to make provision for at least 6,000 new jobs in addition to those on committed sites (approximately 10,000). Despite the doubts expressed by the Council in its statement and at the hearing sessions in relation to the implementation of existing commitments, the Plan is clearly

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based on a strategy of delivering some 16,000 additional jobs between 2011 and 2031. The Council's evidence indicates that significantly more housing than that planned would be required to support this level of jobs growth. There is no substantive evidence that the jobs density or patterns of out-commuting are likely to change to the extent required to support the planned level of employment growth without the need for significantly more housing. In simple terms there is a clear and substantial mismatch between the level of housing and jobs planned.'

- 3.41 This emphasises the importance of the relationship between job growth and labour force growth.

Employment led projections – assumptions on the conversion of Experian job forecasts to labour force requirements

- 3.42 The approach adopted by GL Hearn to calculating the increase in workforce required to meet projected jobs is different to that which has been adopted in other Examinations. Rather than making assumptions about commuting or double jobbing etc. the SHMA seeks to increase the number of workers by the same percentage as the increase in jobs (paragraph 5.50).
- 3.43 The approach taken is that the percentage of employment growth projected by the Experian forecasts is applied to the resident workforce as recorded in each district by the 2011 Census as illustrated by the following Table 7.

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Table 6 Job Growth rates and annual job growth (Experian 2013)

LA/UA/Borough	2011 Jobs	2031 Jobs	2036 Jobs	Percentage Change 2011-31	Percentage Change 2011-36	2031 Jobs	2036 Jobs
Blaby	56,947	63,651	65,361	11.80%	14.80%	335	337
Charnwood	71,104	78,409	79,673	10.30%	12.10%	365	343
Harborough	42,762	51,631	53,575	20.70%	25.30%	443	433
Hinckley & Bosworth	44,391	49,901	51,041	12.40%	15.00%	276	266
Leicester	177,168	189,009	192,298	6.70%	8.50%	592	605
Melton	22,906	24,762	24,993	8.10%	9.10%	93	83
NW Leicestershire	59,045	69,341	71,415	17.40%	20.90%	515	495
Oadby & Wigston	20,708	21,901	21,998	5.80%	6.20%	60	52
Total	495,030	548,605	560,354	10.80%	13.20%	2,679	2,613

Source: Table 20- SHMA 2014

Table 7 Job Growth rates applied to resident workers

	% change PROJ 3 SHMA appendix B	% change PROJ 4 SHMA appendix B	2011 census Economically active: In employment: Total	Increase in resident labour force (PROJ 3)	Increase in resident labour force PROJ 4
Blaby	14.70%	13.20%	48,510	285	256
Charnwood	11.20%	13.20%	79,998	358	422
Harborough	25.10%	13.20%	44,413	446	235
Hinckley & Bosworth	14.90%	13.20%	54,065	322	285
Leicester	8.50%	13.20%	137,987	469	729
Melton	9.10%	13.20%	26,380	96	139
NW Leicestershire	20.80%	13.20%	46,522	387	246
Oadby & Wigston	6.20%	13.20%	26,550	66	140
Total	13.20%	13.20%	464,425	2,452	2,452

Source: Tables in Appendix B SHMA 2014 & Census 2011

- 3.44 The Experian projection in table 20 (as summarised in Table 6 above) suggests that for NW Leicestershire employment will grow from 59,045 in 2011 to 69,341 in 2031 so an increase of 10,300 jobs (515 jobs a year) or 17.4% for the period 2011 to 2031.

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- 3.45 Projection PROJ3 applies the same growth rates but to a lower figure, the resident economically active rather than total jobs. As the rate is applied to a lower figure the increase is also lower and this approach suggests an increase of 388 workers a year as opposed to the 495 jobs in the Experian forecast (2011 to 2036 SHMA tables 20 and B65). This rate of labour force growth of 388 persons a year is modelled to require 478 dwellings a year to 2031 (SHMA table 21).
- 3.46 This approach has been chosen by the consultants to reflect “double jobbing” (i.e. where one person undertakes two paid jobs) and existing patterns of commuting.
- 3.47 As such this approach “models in” existing patterns of commuting and does not seek to consider if these are sustainable patterns of commuting. I have therefore considered the use of the census resident workplace population below to highlight the impact of these assumptions. Comparing this to the above table will provide an indication of existing levels of commuting and the level of additional commuting that is being “modelled in”.

Table 8 Job Growth rates applied to Resident Workplace Population

	2011 census workplace population	Change 2011 to 2036 (PROJ 3)	Change 2011 to 2036 (PROJ 4)
Blaby	51,967	306	274
Charnwood	67,856	304	358
Harborough	42,180	423	223
Hinckley and Bosworth	42,514	253	224
Leicester	163,224	555	862
Melton	22,107	80	117
North West Leicestershire	53,711	447	284
Oadby and Wigston	21,125	52	112
Total	464,684	2454	2454

Source: Tables in Appendix B SHMA 2014 & Census 2011

- 3.48 The difference between the Experian projection and the resident workplace calculation represents the assumed level of additional “double jobbing”. For North West Leicestershire this amounts to some 1,200 persons taking on a second job between 2011 and 2031.
- 3.49 The difference between the work based population estimate and PROJ3 which is the resident based projection is the assumed level of additional commuting. For North

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West Leicestershire this amounts to some 1,475 additional persons travelling into the district to work by 2031.

Employment led projections – assumptions on future distribution of growth

- 3.50 In considering this issue the first point to note is that while the conclusions to the SHMA suggest that some 352 dwellings a year are required to support “Proportionate Economic Growth” (SHMA 2014 Table 85: OAN Conclusions, 2011-36) as explained above this is not the level of housing growth required to meet the Experian 2013 job projections for North West Leicestershire.
- 3.51 The level of dwellings require to support the percentage growth extracted from the Experian 2013 projections for North West Leicestershire is actually more than 100 dwellings higher i.e. **478 dwellings a year** (SHMA table 20)
- 3.52 The relevant evidence is contained in Figure B65: Summary of projections 2011 to 2036 – annual – North West Leicestershire. This contains two employment led projections:
- PROJ 3 (Experian job-led – LA level) this requires 451 dwellings and 388 additional workers a year
 - PROJ 4 (Experian job-led – HMA level) this requires 352 dwellings and 246 additional workers a year
- 3.53 The explanation for not using the results of PROJ 3 which is based upon the forecast employment growth of the district is set out in paragraph 5.54 which states:

“We have taken the growth forecast for Leicester and Leicestershire as outlined by the Experian forecasts and redistributed them based on the current job distribution. This somewhat balances out past trends which are unlikely to continue in to the forecast period (such as growth around East Midlands airport) and planned investments that will not be included in historic trends. It does however indicate the wider growth in employment in the County will still occur without materially considering the implications to changing commuting patterns with areas outside the County”.

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- 3.54 The difference between PROJ3 and PROJ4 is the implication of the assumption that rather than growth occurring in the locations projected by the Experian Forecasts growth will occur proportionately to the resident labour force. PROJ4 applies the average level of job growth across the SHMA to the economically active resident population.
- 3.55 The combined impact of the approach of applying job growth rates to the resident working population and secondly to apply an average level of growth across the whole HMA reduces the level of jobs being planned for from the Experian projection of 515 jobs to the SHMA projection of 246 jobs. The table below sets out these changes:

Table 9 Summary of impact of assumptions regarding job growth in the SHMA 2014

	Annual Rate of Job Growth	2011 to 2036 (2031*)	Percentage of change
Experian 2011 to 2031	515	10,300	
Impact of lower growth in 2031 to 2036 on ave for earlier period	-20	-400	6%
Experian 2011 to 2036	495	12,375	
Allowance assumed for double jobbing	-48	-1,200	18%
Experian job growth rate applied to Workplace Population	447	11,175	
Impact of assumed level of additional commuters into District	-59	-1,475	22%
Resident labour (PROJ 3)	388	9,700	
Impact of assumed lower rate of employment growth (redistribution of growth to other locations in SHMA).	-142	-3,550	54%
PROJ4	246	6,150	

- 3.56 The level of job growth supported by the 372 dwellings a year is just 246 jobs per year compared to projection PROJ3 of 451 dwellings a year and 388 jobs per year (Figure B65 2011 to 2036). Both of these are below the Experian projection of job growth for the period to 2031 of 515 jobs a year.
- 3.57 As Objectively Assessed Needs are required to be "policy off" assessments (Framework 159 and Hunston Court of appeal paragraph 26) this redistribution of employment growth based upon assumptions about future availability of sites (for example around East Midlands Airport) appears to be contrary to this principle.
- 3.58 There are a number of issues with this assumption including:

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- It predetermines future decisions with regard to the location of employment land
- It fails to recognise that job densities can increase significantly through the change of use or redevelopment of commercial property and so job growth is not entirely dependent upon new floorspace provision.

3.59 In paragraph 9.17 the SHMA confirms that it has distributed the growth in employment based on the relative size of the current economic base in different parts of the HMA rather than on individual economic projections for each authority. It goes on to state:

'It is a 'policy off' analysis. Taking account of demographic structure, the SHMA analysis particularly indicates that higher housing provision (relative to the demographic-led projections) would be necessary to support growth in the workforce in Harborough, Hinckley & Bosworth, Melton and NW Leicestershire. In these authorities we have suggested an upwards adjustment to housing provision to support economic growth.'

3.60 The redistribution of employment growth on this basis makes a significant change to where both future employment and housing land is required. This redistribution is not based upon current evidence of employment growth but on the distribution of resident labour as explained above. It therefore does not respond to growing locations or sectors where businesses are expanding.

3.61 I consider the more appropriate "policy off" projection within the GL Hearn report to be the 478 dwellings a year as set out in table 20 although as explained above this too contains assumptions regarding commuting and double jobbing.

3.62 This figure does not however in my view represent the Objectively Assessed Need as it does not seek to address the requirement of the framework as highlighted by the report's authors in paragraph 9.30 of the 2014 SHMA which requires the integration (rather than alignment) of strategies for housing and employment.

3.63 The implications of the employment strategies being pursued by the LEP are discussed later.

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Assumptions regarding activity rates

3.64 The SHMA also assumes continuing growth in activity rates throughout the period explained in appendix B:

'B.16 The figure below shows past trends in economic activity rates (nationally) based on Census data. A similar analysis using Labour Force Survey data shows almost exactly the same pattern. The data shows that there have been some notable increases in activity rates for older age groups over the past decade.

B.17 To project these rates forward, it has been assumed that there will be some continuation of the trends shown below although these have been tempered slightly. The overall assumption is that rates will change moving forward at a rate which is around half of the rate seen over the past decade. For older age groups (and females for most age groups) this sees some increase in employment rates. For those aged 16-24 the rates are assumed to continue declining, but at a lesser rate to that observed over the 2001-11 decade.'

3.65 This approach increases the number of workers within the population and reduces the population required to support a growing economy. I do not consider this to be based upon sound evidence as is suggested by reference to the following Nomis data for the period since 2010 for East Midlands which appears to suggest a slight decrease in the level of activity:

Table 10 Economic activity rates (%)

	All ag 16 & over	16 - 64	16 - 17	18 - 24	16-24	25 - 34	35 - 49	50 - 64	65+
Jan 2010 - Dec 2010	62.8	76.5	34.9	69.7	62.6	84.9	86.6	68.7	9.2
Jan 2011 - Dec 2011	63.3	77.3	41.1	70.4	64.5	85.3	87.7	68.6	9.2
Jan 2012 - Dec 2012	63.1	77.7	44.4	70.1	65.0	85.5	88.6	68.5	8.8
Apr 2012 - Mar 2013	62.8	77.5	45.1	68.9	64.2	85.4	88.1	68.9	8.5
Jul 2012 - Jun 2013	62.7	77.5	43.1	69.3	64.1	85.4	87.8	69.4	8.3
Oct 2012 - Sep 2013	62.7	77.5	40.1	68.5	62.8	85.5	87.7	70.1	8.6
Jan 2013 - Dec 2013	62.7	77.5	38.6	70.0	63.7	84.8	87.7	70.1	8.7
Change on year	-0.5	-0.2	-5.9	-0.1	-1.3	-0.6	-0.9	1.6	0.0

Source Nomis 2014

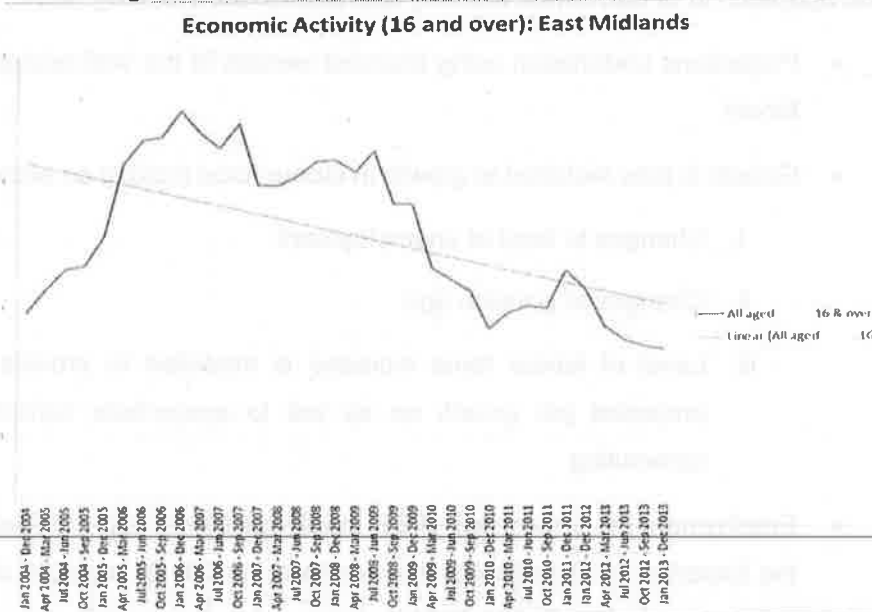
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3.66 The long term trends for England and the East Midlands are shown on Chart 1 and Chart 2 below:

Chart 1: Long term evidence on changes to activity rates in England



Chart 2: Long term evidence on changes to activity rates in East Midlands



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3.67 This evidence suggests that the long term trend is for only a very small increases in activity rates (mostly driven by changes in London and the South East) which are countered by longer terms trends of decreasing activity rates in other regions. This does not support the approach adopted in the GL Hearn report.

Affordable Housing

3.68 Table 84 concludes that the affordable housing need for the District is 212 dwellings a year out of the total 284 dwellings a year required to meet the objectively assessed need (i.e. 75%).

3.69 This implies that there is market demand for just 72 dwellings a year in the future.

3.70 This assumption lacks realism in terms of existing market evidence discussed elsewhere in the GL Hearn report and as such little weight might be placed upon this assessment of objectively assessed need.

3.71 It is noted in paragraph 9.14 that the report suggest that there is a case for higher levels of provision based upon delivering affordable homes.

Comparison to SPRU approach

3.72 The approach in SHMA differs from my approach in the following ways:

- Projections undertaken using licenced version of the well-recognised Chelmer Model
- Growth in jobs matched to growth in labour force making an allowance for:
 - i. Changes to level of unemployment
 - ii. Changes to pension age
 - iii. Level of labour force increase is modelled to provide for all future projected job growth so as not to exacerbate current levels of in commuting
- Employment led projections of 651 dwellings based upon 515 jobs a year from the Experian 2013 projection summarised in table 20 page 94 of the Leicester and Leicestershire SHMA 2014.

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- Household Representation rates are modelled to improve to reflect the requirements of the Framework.

3.73 Despite all of the technical differences the main difference between the projections are the assumed number of jobs which are to be planned for in the District with the SHMA 2014 suggesting a level of dwellings that support a range of job growth between 182 jobs (PROJ 1) and 246 jobs (PROJ 4) a year compared to the Experian 2013 projection of 515 jobs used in my analysis (SHMA table 20).

3.74 These differences are explained further in Section 7 of these submissions.

The Leicester and Leicestershire Strategic Housing Market Area Objective Assessment of Housing Need (Barton Wilmore June 2014).

3.75 This report has been produced by Barton Wilmore LLP on behalf of Gladman Developments to provide an in depth analysis of the future requirements of the housing market area and follows the same principles of many of the Local Authority produced SHMA (LLSHA OAN paragraph 1.2).

3.76 This work utilises the POPGroup model which while different from the Chelmer model but in our experience provides generally consistent results with similar input assumptions.

3.77 This is a helpful document in so far as it provides a further independent assessment of the level of housing required to meet employment growth at both the district level and the wider HMA.

Table 11 Summary of Employment growth 2011 to 2031 for N W Leicestershire

Projection	Dwellings	Jobs	Total Jobs	Source
Higher Job Growth	828	835	16,707	Table 7.3
Lower Job Growth		677	13,540	Table 7.4
Demographic led housing requirement	315			Table 9.1

Source: Leicester and Leicestershire Strategic Housing Market Area Objective Assessment of Housing Need (Barton Wilmore June 2014)

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3.78 The implications of these projections for NW Leicestershire are:

Table 12 Components of employment growth for N W Leicestershire

Source	Ave annual Jobs	Total Jobs
Experian (2013)	327	6,540
Jobs supported by LEP (Priority Locations)	350	7,000
Additional Jobs supported by LEP (Remainder distributed in proportion with growth forecast)	158	3,166
Total new jobs	835	16,707

Source: Table 5.2: Distribution of LEP Jobs Leicester and Leicestershire Strategic Housing Market Area Objective Assessment of Housing Need (Barton Wilmore June 2014)

3.79 In table 7.3 and table 7.4 the report sets out adjustments made to convert the total employment forecast to the need for additional labour (Labour Capacity Shortfall). In particular:

- a downwards adjustment to allow for in commuting to provide some 14,757 additional persons in the labour force (table 7.3)
- a further reduction to allow for reduced unemployment down to 11,235 persons (table 7.4).

3.80 This produces a range for NWL of between 725 and 828 dwellings table (8.4 and 8.6).

3.81 Table 5.2 illustrates how the additional 45,000 additional jobs proposed by the LEP between 2014 and 2020 (Chapter 3 and paragraph 5.8) will be distributed.

3.82 The main point of interest in this approach is the attempt to distribute the impact of the LEP strategy. As explained in paragraph 5.8 Barton Wilmore added the LLEP plans to create 45,000 jobs between 2014 and 2020, (in key growth areas) to the job growth in the 2013 based Experian projections.

3.83 The Barton Wilmore report concludes that taking into account the need to integrate housing and economic policy and to address the issue of affordable housing supply then the higher growth scenario of **836 dwellings a year**:

“goes some distance towards supplying sufficient homes, but is still forecast to fall short of completely addressing affordable housing need”.

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Conclusion on past evidence of the Objectively Assessed Need for Housing

- 3.84 The major difference between the GL Hearn and Barton Wilmore reports is that the GL Hearn approach specifically does not seek to integrate economic and housing strategy's while the Barton Wilmore approach does attempt to do this.
- 3.85 The second difference is that while Barton Wilmore takes the level of job growth for the district and then adds to it to reflect the SEP, the GL Hearn approach is to reallocate projected job growth to other parts of the HMA on the grounds of supply side constraints.
- 3.86 These differences mean that in effect each report is planning for a radically different level of employment growth in NW Leicestershire which will explain much of the difference between the two reports (see Table 12 below). The preference for one of these figures, or indeed the figure calculated within this report, will largely be a decision based on which assumption reflects the most likely level of future employment growth in the District.
- 3.87 As a starting point the Barton Wilmore approach must be given the greater weight in so far, as it attempts to integrate the economic and housing strategies for North West Leicestershire. The GL Hearn report explicitly states that it does not attempt to do this.

Table 13 Comparison of projected level of employment and housing growth in North West Leicestershire in GL Hearn and Barton Wilmore reports

Source	Ave Annual Jobs	Ave Annual Dwellings
PROJ 4 (Experian job-led – HMA level) Figure B65: Summary of projections 2011 to 2036 The Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) 2014 (GL Hearn 2014)	246	352
Table 5.2: Distribution of LEP Jobs Leicester and Leicestershire Strategic Housing Market Area Objective Assessment of Housing Need (Barton Wilmore June 2014)	835	836

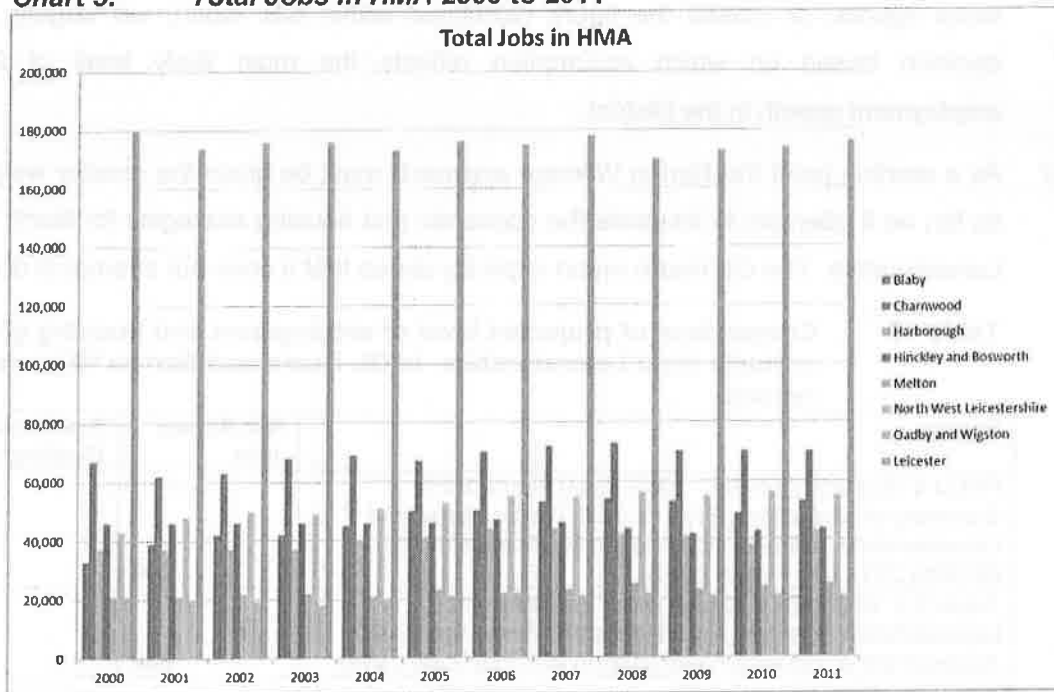
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4.0 INDICATORS OF MARKET DEMAND

Employment growth

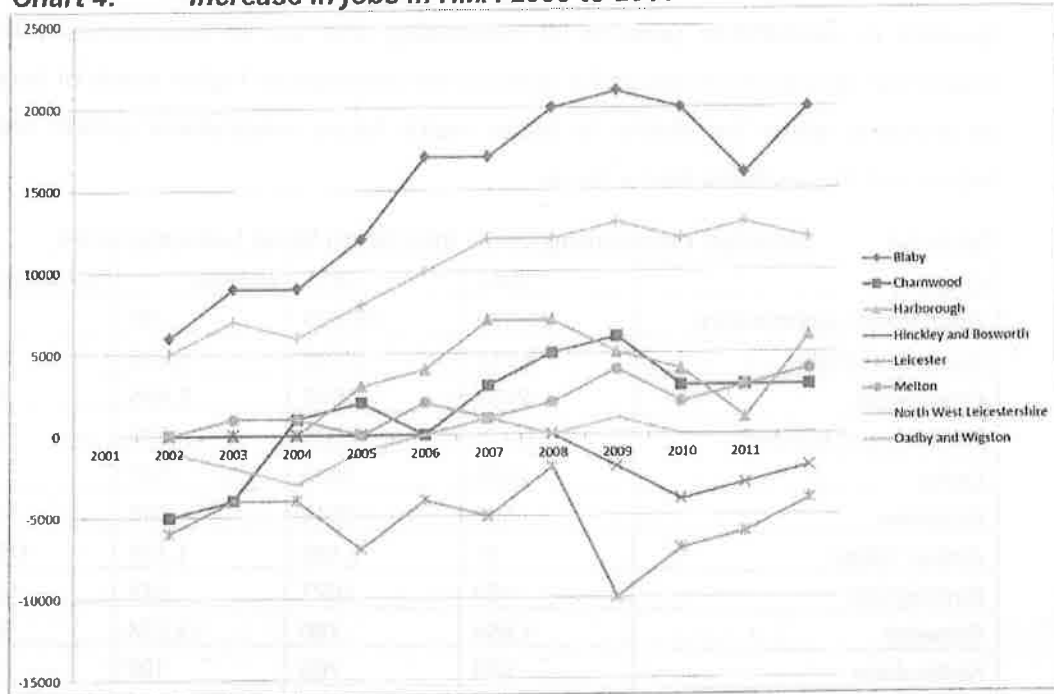
- 4.1 North West Leicestershire has experienced strong employment growth compared to some other locations within the HMA. Chart 6 below shows that the district has the third largest workforce having overtaken Hinckley and Bosworth.
- 4.2 The rate of growth has been the fastest in Blaby (averaging over 1,800 jobs a year 2000 to 2011) while North West Leicestershire has experienced the second fastest rate of growth at almost 1,091 jobs a year.
- 4.3 Chart 7 illustrates that these two districts appear to be performing noticeably above the other districts within the HMA.

Chart 3: Total Jobs in HMA 2000 to 2011



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Chart 4: Increase in jobs in HMA 2000 to 2011



Changing Patterns of Commuting

4.4 The level of employment growth would appear to have occurred during a period of limited housing development therefore to investigate how this might have occurred I have considered the changes in patterns of commuting in to the district.

4.5 Table 15 and 16 considers the patterns of in and out commuting in 2001 and 2011.

4.6 General conclusions drawn from this data are:

- The number of workers living and working in the district has remained relatively constant.
- There has been increased in commuting from the surrounding Districts.
- There has also been an increase in out commuting particularly to the larger urban areas.
- The level of in commuting appears to have grown faster than the level of out commuting.

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- 4.7 This evidence suggest that past patterns of job growth and housing provision have not resulted in sustainable patterns of commuting and so, in accordance with the Guidance, consideration should be given to the potential for higher levels of house to be provided within the district to better match future employment growth with an increase in the available labour force.

Table 14 Selected commuting flows into North West Leicestershire

Origin	2001	2011	change	% change
North West Leicestershire	24,379	24,329	-50	0%
South Derbyshire	3,812	5,798	1,986	52%
Charnwood	2537	5032	2,495	98%
Hinckley and Bosworth	1,376	2,021	645	47%
Derby	2026	1839	-187	-9%
Broxtowe	596	1642	1,046	176%
Amber Valley	71	1,195	1,124	1583%
Birmingham	153	1027	874	571%
Erewash	1,954	780	-1,174	-60%
Nottingham	573	765	192	34%
Blaby	551	749	198	36%
Rushcliffe	691	729	38	5%
East Staffordshire	810	718	-92	-11%
North Warwickshire	201	525	324	161%
Oadby and Wigston	173	438	265	153%
Leicester	728		-728	-100%
	40,631	47,587	6,956	17%

Source 2001 Census 2011 Labour Force Survey

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Table 15 Selected commuting flows out of North West Leicestershire

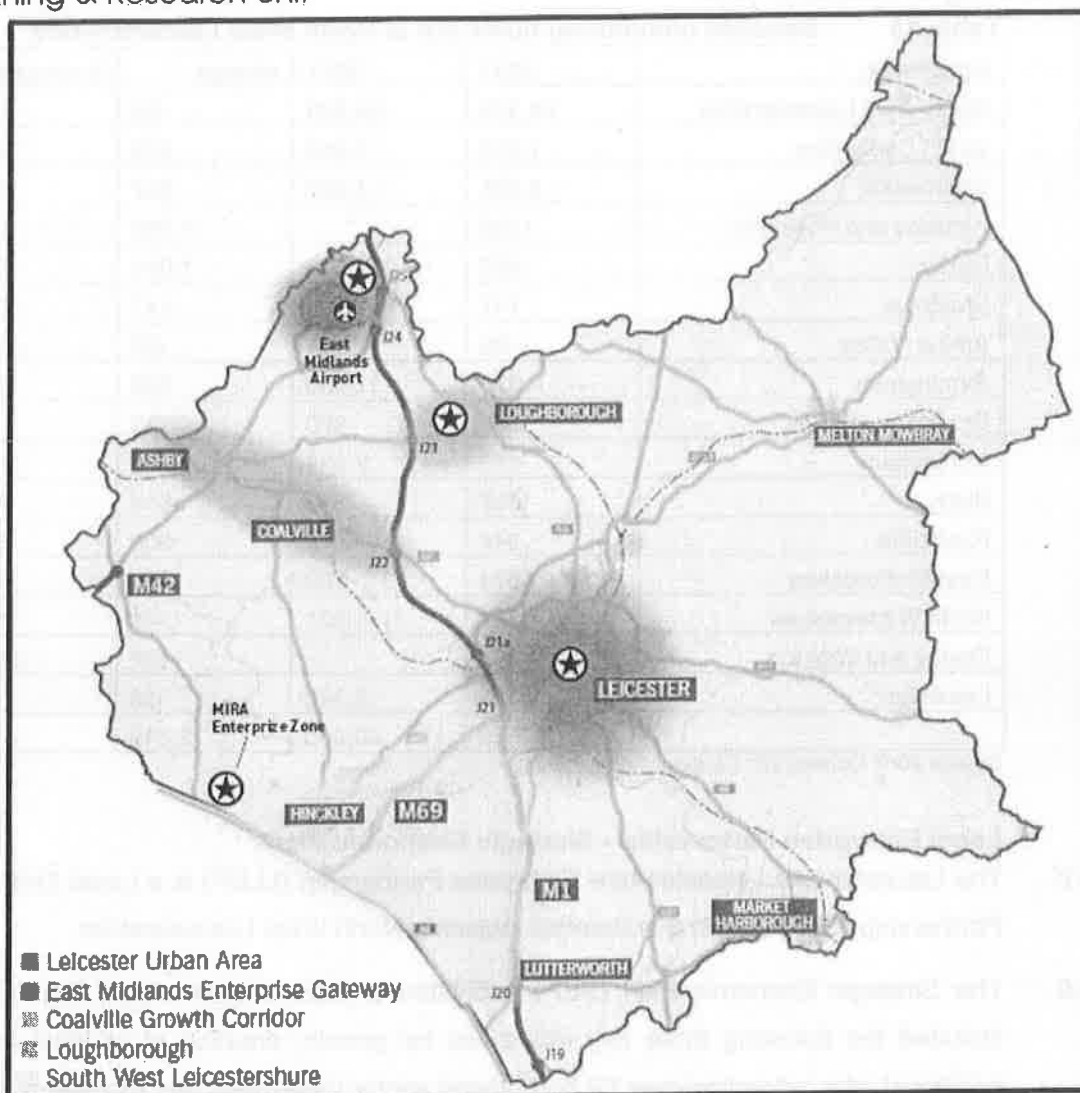
Destination	2001	2011	change	% change
North West Leicestershire	24,379	24,329	-50	0%
South Derbyshire	1,292	1,664	372	29%
Charnwood	3,395	4,262	867	26%
Hinckley and Bosworth	1766		-1,766	-100%
Derby	855	1,946	1,091	128%
Broxtowe	147		-147	-100%
Amber Valley	89		-89	-100%
Birmingham	670	1,255	585	87%
Erewash	353	320	-33	-9%
Nottingham	676	2,635	1,959	290%
Blaby	997	383	-614	-62%
Rushcliffe	344	644	300	87%
East Staffordshire	674	809	135	20%
North Warwickshire	367	321	-46	-13%
Oadby and Wigston	127		-127	-100%
Leicester	2,428	2,340	-88	-4%
	38,559	40,908	2,349	6%

Source 2001 Census 2011 Labour Force Survey

Local Enterprise Partnership - Strategic Economic Plan

- 4.8 The Leicester and Leicestershire Enterprise Partnership (LLEP) is a Local Enterprise Partnership (LEP) covers 8 authorities including North West Leicestershire.
- 4.9 The Strategic Economic Plan (SEP) submitted to Government on 31 March 2014 included the following three key objectives for growth; creation of at least 45,000 additional jobs, attracting over £2.5bn private sector investment and increasing Gross Value Added (GVA) by £4bn to £23bn (SEP page 2).
- 4.10 The SEP's Flagship Proposal 21 focuses on delivering investment and jobs across five Growth Areas and four Transformational Priorities. These include the East Midlands Airport and the Coalville to Ashby Growth Corridor (see plan on next page).

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Source: SEP 2014 page 6

Economic Projections

***North West Leicestershire Employment Land: Updated Demand Forecasts
Roger Tym and Partners January 2012***

4.11 Roger Tym and Partners (RTP) were commissioned by North West Leicestershire District Council to forecast the demand for employment floorspace and land in the district over the plan period 2006-31. The forecast will help inform employment land provision targets in the Council's emerging Core Strategy (paragraph 1.1).

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- 4.12 The forecast of employment in North West Leicestershire is based on Oxford Economics' local economic forecasting model and its standard assumptions, which include its current view of the macroeconomic and demographic context. The forecast relates to all jobs located in the district ('workplace jobs'), covering both employees and the self-employed, and all economic sectors (paragraph 2.1).
- 4.13 One of the assumptions input into the model has been customised to reflect the district's planning policy. To help ensure that the Core Strategy targets for housing and employment land are mutually consistent, the forecast's assumptions about the district's future resident population are based on the housing targets proposed in the Council's emerging Core Strategy. The housing and population assumptions of 510 dwellings a year were taken from the preferred scenario in the Council's housing requirements study (paragraph 2.2)
- 4.14 The report states that there is a causal link between future resident population and future workplace employment, because the model assumes that population growth leads to employment growth in those economic sectors that serve local residents, such as retail, education and health. It does, however, highlight that few local service jobs are based in B-class space. Therefore the link between resident population and B-class employment, which in turn drives employment land demand, is weak (paragraph 2.3).
- 4.15 This report includes two variations of employment growth, the "fixed share" projection and the "floating share" projections. These both project growth of 9,963 jobs (2011 to 2031) equivalent to an average of 498 jobs a year (North West Leicestershire Employment Land: Updated Demand Forecasts - Table 2.4 and 2.5 Employment change per annum, North West Leicestershire).

Leicester and Leicestershire HMA Employment Land Study PACEC January 2013

- 4.16 This report was commissioned by The Housing, Planning and Infrastructure Group of the Leicester and Leicestershire Enterprise Partnership (LEEP) and has been produced for the LEP by Lambert Smith Hampton, PACEC (Public and Corporate Economic Consultants) and Warwick Business Management in 2013. The report was an update of the Leicester and Leicestershire Employment Land Review 2008. The

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purpose of the study is to provide an up to date evidence base to inform emerging employment land policies in Local Plans.

- 4.17 In this work there are both projections of all jobs as well as Full Time Equivalent Jobs (FTE's).
- 4.18 For all jobs the level of growth for the district is calculated at some 9,500 jobs (table 4.83 - 56,100 (estimated) at 2011 compared to the projected 65,600 at 2031).
- 4.19 The projection for FTE's for the period 2011 to 2031 is calculated as being 7,900 FTE jobs (Table 4.84 Estimated 2011 figure 48,200 FTE jobs increasing to 56,200 FTE jobs).
- 4.20 The projection has been used to forecast future floorspace and land requirements and has been based upon the methodology set down in the ODPM Employment Land Reviews: Guidance Note (2004) (paragraph 3.1.1).
- 4.21 In this projection of future jobs the national GDP forecasts have been used as a framework for the national and district-level forecasts of employment by use class. Firstly, they project forward the national change in employment in each use class using the regression analysis. Secondly, they project forward the change in each district's share of employment in each use class. Finally, they make adjustments based on local conditions which may have distorted the trend analysis, such as a major local development which boosted local employment in a particular sector but which is unlikely to be repeated (paragraph 3.3.3).

Leicester and Leicestershire Strategic Housing Market Assessment, June 2014

- 4.22 This report by GL Hearn and JG Consulting utilises "baseline" econometric forecasts from Experian, prepared in autumn 2013 (paragraph 5.47).
- 4.23 The Experian forecasts provide an indication of the expected job growth at a local authority level taking account of the economic (sectoral) structure of employment in each authority. The forecasts effectively assume that historical relationships hold true, whereby if a sector in an authority has performed better relative to the region/ UK in the past it is expected to continue to do so moving forward. These forecasts do not take account of supply-side factors or policy ambitions/ interventions and it is stated that forecast should be treated with caution at a local authority level (paragraph 5.48)

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- 4.24 Paragraph 5.49 explains that table 20 of the GL Hearn Report provides the percentage increase in the number of jobs expected between 2011 and 2031 in the Experian 'baseline' forecasts. It highlights that the data shows that particularly strong growth is expected in Harborough and North West Leicestershire rising from 59,045 to 69,341 jobs (515 jobs a year).
- 4.25 The way this figure is utilised to inform the housing projections is set out in paragraph 5.50 and I have already commented upon this approach. The level of job growth that will be accommodated by the proposed 350 dwellings a year is, according to the analysis of the SHMA 2014, just 246 jobs a year (SHMA 2014 figure B65).
- Leicester and Leicestershire Strategic Housing Market Area: Objective Assessment of Housing Need (Barton Wilmore) June 2014***
- 4.26 This report considered both the 2014 Experian and Oxford Economics employment projections to 2031 but concluded that the Experian projections were to be preferred as they better related to past trends (paragraph 5.6).
- 4.27 The report then factors in the stated aspirations of the LEP referred to above. The results are set out in table 5.2 on page 43.
- 4.28 For North West Leicestershire this starts with a projected job growth (Experian 2014 of 6,540 jobs (327 jobs a year) and then increases this by a further 7,000 jobs in relation to LEP priority locations and then an additional 3,166 jobs related to additional jobs supported by the LEP distributed proportionally based on the growth forecast.
- 4.29 The total level of Job growth in this approach is 16,707 or 835 jobs a year.

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Summary of jobs growth

4.30 The table below sets out a summary of the different levels of jobs growth available:

Table 16 Summary of jobs growth

Model/source	Date	Source	Annual job growth
Nomis	2014	Nomis data base (2010 to 2013)	1,091
Experian	2014	Leicester and Leicestershire Strategic Housing Market Area: Objective Assessment of Housing Need (Barton Wilmore) June 2014 Table 5.2	327
Barton Wilmore (reflecting LEP proposals)	2014	Leicester and Leicestershire Strategic Housing Market Area: Objective Assessment of Housing Need (Barton Wilmore) June 2014. Table 5.2	835
Experian	2013	Leicester and Leicestershire Strategic Housing Market Assessment, June 2014 (Table 20)	515
GL Hearn	2013	Leicester and Leicestershire Strategic Housing Market Assessment, June 2014 Figure B65 PROJ 4	246
PACEC (Public and Corporate Economic Consultants)	2013	Leicester and Leicestershire HMA Employment Land Study PACEC January 2013 Table 4.84	395
Oxford Economics	2012	North West Leicestershire Employment Land: Updated Demand Forecasts Roger Tym and partners January 2012 Table 2.4	498

4.31 The housing figure now being supported by the council is based upon the lowest level of employment growth projected in the last few years for the District.

Consideration of employment projections in light of development proposals

4.32 It has already been highlighted that the GL Hearn report is based upon the assumption that previous levels of employment growth within the district are unlikely to continue (GL Hearn report paragraph 5.54) and this is clearly demonstrated by the summary of the projections in the table above.

4.33 In order to test the validity of this assumption I have considered not just the alternative projections above but I have also reviewed development proposals within the district to consider if there is likely to be a supply side constraint on employment growth in terms of lack of sites and floorspace.

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Land At Little Battleflat Farm Beveridge Lane Coalville 13/00249/OUTM Paragon (Coalville)

- 4.34 Planning permission was granted in July 2014 for Employment uses (B2/B8) of up to 1,300,000 sqft (120,773 sqm approx.) with associated ancillary uses and associated infrastructure. The committee report referred to the Applicant's assessment that the floor space will create around 1,300 full time equivalent jobs.

East Midlands Gateway

- 4.35 East Midlands Gateway is a proposed Strategic Rail Freight Interchange (SRFI) on a site north of East Midlands Airport in Leicestershire. The site is being promoted by, and would be developed by, Roxhill Developments Ltd.
- 4.36 An SRFI is defined by Government as a "large multi-purpose rail freight interchange and distribution centre linked into both the rail and trunk road system. It has rail-connected warehousing and container handling facilities and may also include manufacturing and processing activities". Government policy is that SRFI-s are important because they can provide a range of transport, environmental, and economic benefits and as a result the policy is that there should be a network of them in the UK. The Government's draft National Policy Statement relating to 'national networks' published in December 2013, which includes policy guidance on SRFIs, can be found here.
- 4.37 The East Midlands Gateway proposal is a Nationally Significant Infrastructure Project (NSIP) and as such requires an application for a Development Consent Order to be prepared and submitted to the National Infrastructure Directorate of the Planning Inspectorate. The period of public consultation on this project closed on the 25th June 2014.
- 4.38 East Midlands Gateway would provide large-scale warehousing together with an intermodal rail freight interchange. This would provide the facilities to enable large volumes of freight to be transferred to and from road vehicles and freight trains. In simple terms, it would operate as an inland port. It would therefore directly support a wide range of economic sectors within the UK, and form part of increasingly significant flows of international cargo movements. The proposal is expected to generate around 7,000 direct jobs once operational, and include training opportunities and integrated

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public transport facilities, as well as further employment through the construction phase.

- 4.39 Associated with the scheme will be large scale road improvements and a new direct rail link connecting to the existing Castle Donnington Branch freight line, providing access to the national rail freight network and to the UK's major ports. Further details of the proposals are provided on the Masterplan page, and on the Application Documents page.

Rail-connected Storage and Distribution (78,740 square metres) at Coleorton

- 4.40 This application (07/01372/FUL) was considered by the council in January 2014 and has been recommended for approval subject to a Section 106 agreement. The proposal is for the erection of rail connected distribution buildings and associated works at the former UK Coal Lounge Disposal Point on Ashby Road, Coleorton.

- 4.41 The proposal comprises a principal building with a gross floor space of 78,740 square metres; of which 74,976 square metres would be warehouse storage and 3,724 square metres would be office and other accommodation.

- 4.42 The proposal includes the following:

- e. Construction of a rail-connected storage and distribution building with associated infrastructure, plant, offices, car and lorry parking, landscaping and structures on the site. A small gate house would be located to the east of the site on the access road to the main building.
- f. Submitted plans show that the principal building would be approximately 416 metres long and 189 metres wide, with a floor to eaves height of 15 metres and a floor to ridge height of some 18.6 metres.
- g. A rail yard and container storage facilities
- h. Parking for 150 HGVs and 501 cars.

- 4.43 The Council report that the proposal once operating will create between 800 to 1000 jobs.

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4.44 The site is located outside the limit development immediately to the south-east of Flagstaff Island where the A511 and the A512 both join the A42. The site is also within the catchment area of the River Mease Special Area of Conservation.

Conclusion

4.45 The 3 major employment schemes outlined above have the ability to deliver a total of 9,100 - 9,300 jobs

Table 17 Summary of major employment proposals

Scheme	Application	Jobs
Land At Paragon (Coalville)	13/00249/OUTM	1,300
East Midlands Gateway		7,000
Rail-connected Storage and Distribution Coleorton	07/01372/FUL	800 - 1000
Estimated Job Growth		9,100 - 9,300

4.46 I have highlighted that the GL Hearn work has not taken in account the impact of the SEP's Growth Priorities for East Midlands Airport or the Coalville Ashby Growth Corridor but highlight that the outcomes of the bidding process need to be taken into account as the strategy for development is progressed (Paragraph 9.30).

4.47 The approach in the GL Hearn report has been to assume that future projected employment growth in North West Leicestershire will be redirected to other locations as explained in paragraph 5.44:

'We have taken the growth forecast for Leicester and Leicestershire as outlined by the Experian forecasts and redistributed them based on the current job distribution. This somewhat balances out past trends which are unlikely to continue in to the forecast period (such as growth around East Midlands airport) and planned investments that will not be included in historic trends.'

4.48 The upper range of the GL Hearn Assessment makes provision for employment growth of an average of 246 jobs a year (Page 234 Figure B65 PROJ4). The three schemes above have the potential alone to deliver an average of 455 jobs a year.

4.49 I suggest that the higher levels of employment growth are a more realistic outcome.

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4.50 This evidence suggests that the objectively assessed housing need should consider carefully the future needs of the local economy as the Guidance suggests that further divergence of employment growth and labour force change may result in unsustainable patterns of commuting.

House prices and affordability

4.51 Chart 8 demonstrates that mean house prices in North West Leicestershire have not increased above the national rate (DCLG Live Table 585 Housing market: mean house prices based on Land Registry data, by district, from 1996) but are still some three times higher than they were in 1996.

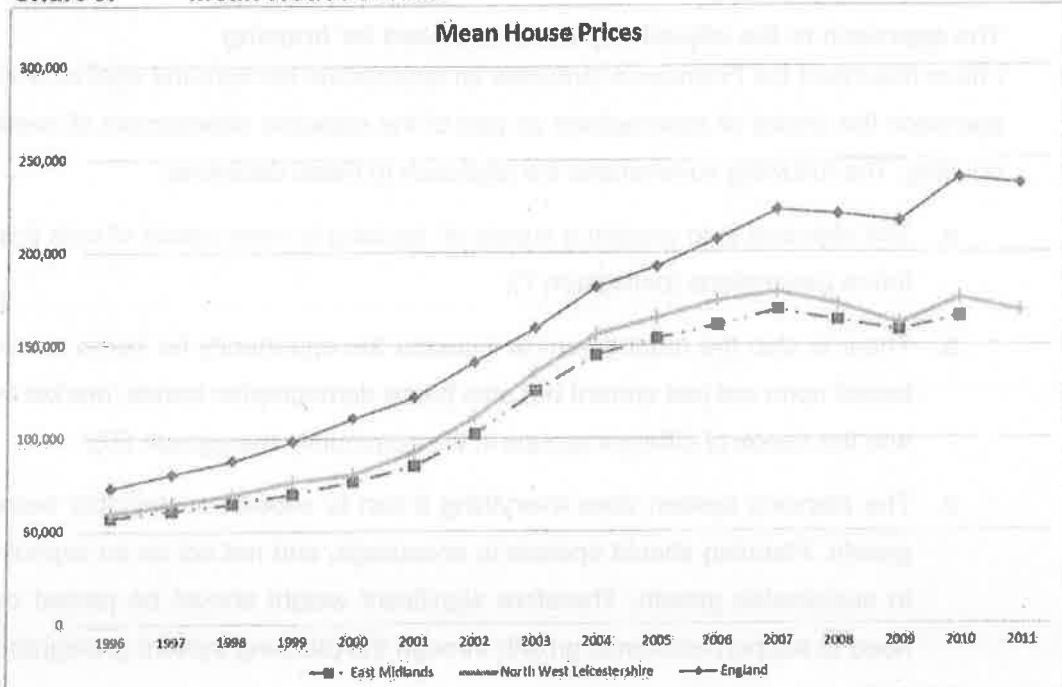
4.52 The second chart on the following page compares the ratio of lower quartile house price to lower quartile earnings by district, from 1997 (DCLG Live Table 576). This illustrates that in 1997 the level of affordability in the district was similar to that for England as a whole, at about 3.5 times earnings. At this time the district was less affordable than the average of the region. In the period 2001 to 2007 the district affordability worsened and was slightly higher than the ratio for England. At the present time the ratio is still more than 6 times earnings and remains higher than the region as a whole.

4.53 This suggests that there is a level of unmet demand in the district.

4.54 In light of the Guidance (Paragraph: 020 Reference ID: 2a-020-20140306 How should plan makers respond to market signals?) where there is evidence of unmet demand there should be consideration given to increasing level of housing provision. In respect to the extent of the adjustment that needs to be made, this needs to reflect the worsening of the affordability ratio of the district. As the Objectively Assessed Need is based on the employment led projection, additional dwellings required by this approach should assist in addressing the issue of affordability in the district.

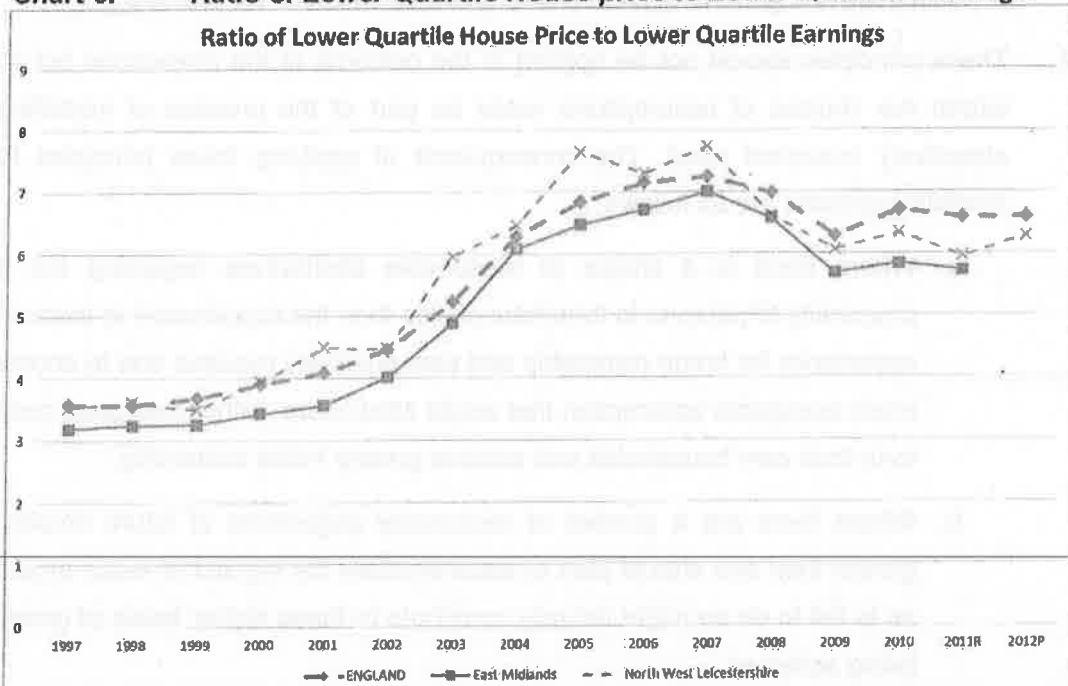
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Chart 5: Mean House Prices



Source: DCLG Live table 581

Chart 6: Ratio of Lower Quartile House price to Lower Quartile Earnings



Source: DCLG Live Table 576

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5.0 THE OBJECTIVELY ASSESSED NEED FOR HOUSING

The approach to the objectively assessed need for housing

5.1 I have described the Framework provides an appropriate background against which to approach the choice of assumptions as part of the objective assessment of needs for housing. The following summarises the approach to these decisions:

- a. The objective is to provide a supply of housing to meet needs of both this and future generations (paragraph 7);
- b. There is also the requirement to increase the opportunity for home ownership based upon not just current but also future demographic trends, market trends and the needs of different groups in the community (paragraph 50);
- c. The planning system does everything it can to support sustainable economic growth. Planning should operate to encourage, and not act as an impediment, to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system (paragraph 19); and,
- d. Finally the general approach is for plans to be positively prepared.

5.2 These principles should not be applied to the outcome of the projections but should inform the choices of assumptions made as part of the process of modelling the objectively assessed need. The consequence of applying these principles to the modelling process are as follows:

- a. Where there is a choice of reasonable alternatives regarding the future propensity of persons to form households then the requirement to increase the opportunity for home ownership and plan positively requires one to choose the more favourable assumption that would allow more, rather than less, people to form their own households and achieve greater home ownership.
- b. Where there are a number of reasonable projections of future employment growth then one should plan to accommodate the highest of these projections as to fail to do so might actually contribute to these higher levels of growth not being achieved.

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- c. As confirmed in the Hunston decisions, once an objectively assessed need has been arrived at following these principles, then the housing requirement maybe set at less than the need if:
- i. Any adverse impacts of meeting objectively assessed need would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in this Framework indicate development should be restricted and
 - ii. The Council has engaged the Duty to Cooperate (Framework paragraphs 178 to 181) so that these needs are met elsewhere so as to fulfil the core principle of delivering the homes the country needs (paragraph 17).
- 5.3 In light of the above, I am of the opinion that not only is effective demand returning to the housing market not only from those who have been excluded from the market by past conditions but also arising from those entering the age of potential home ownership. The low level of Household Representation Rates included in the 2011 interim household projections are, therefore, inappropriate when modelling the objective housing need for the district.
- 5.4 I therefore consider that the use of a household representation rate that simply tracks the long term trend but does not make any attempt to return to previous rates of home ownership as projected by the 2008 DCLG household projections effectively continues to model in under provision of homes and hence continued exclusion from the housing market for some groups in the long term. Such an assumption, while a reasonable option in terms of a statistical approach, does not fulfil the requirements of the Framework, in particular paragraph 17, of meeting the housing needs of the country, or increasing the opportunity for home ownership.

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The two stages to determining the objectively assessed need for housing

5.5 In determining the Objectively Assessed Need for housing the Framework requires that a two stage approach is taken. This may be summarised as follows:

- a. Consideration of demographic projections and trends (para 159 of Framework);
- b. Consideration of the needs of the economy (para 158 of Framework). This has been described as the “final step” in the assessment in the South Worcestershire Development Plan Inspectors letter and the balance between employment growth and housing provision also featured strongly in the Inspectors letter finding the Vale of Aylesbury Plan unsound.

The Chelmer Model

5.6 The Chelmer Model was developed by Professor David King Associate Dean in the Faculty of Science and Technology at Anglia Ruskin University and has since 1986 has been used widely by regional and local government bodies and by planning consultants working for the development industry. Professor King was also instrumental in developing government household projections and was lead advisor to the Department for Communities and Local Government and the Office for National Statistics.

5.7 The Chelmer Model is a variant of the official government projection methodology developed by Professor King (page 39 Strategic Housing Market Assessments – Practice Guidance)

5.8 Professor King developed the model in response to the lack of tools for strategic planning in the UK at that time. The purpose of the model was that it should encourage collaboration and debate on the mechanics of modelling and particularly on the implications of the projections. As a result, debate at many planning inquiries became focused not on alternative methodologies but on future migration patterns and the relationship between housing markets – hence saving hours of debate and consequential costs.

5.9 It is a five year cohort model and is a recognised tool for testing scenarios as highlighted by the SHMA practice guide and various appeal decisions.

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- 5.10 The model takes a given population and “ages” this population between 2011 and 2036 by applying the death rates which are appropriate to each age group.
- 5.11 It also adds births to the population according to the level of fertility recorded for each age group for females
- 5.12 The likely level of out migration and in migration for each age sex cohort is also applied which will add or remove persons from the area
- 5.13 The likelihood of people to be economically active at each age is calculated taking into account the propensity of these persons to work depending on their age and sex.
- 5.14 The likelihood of a person at each age to become a head of household (Household Representation Rates) is also applied to each age/sex group giving the likely level of housing requirement.
- 5.15 The model has been used extensively and Robin Edwards (ex-Hampshire CC) is quoted as saying:

‘At Hampshire County Council we made great use of the Chelmer Model which I regarded as head and shoulders above other available forecasting models. I firmly believe the Population and Housing Research Group made a massive contribution to improving the quality of local authority demographic work. (Planning 26th February 2012)’

- 5.16 More recently, use of the Chelmer Model has been accepted by the Planning Inspectorate in appeals:
 - a. APP/J3720/A/10/2139071 regarding Land South of Kipling Road, Stratford-upon-Avon: the Planning Inspector described the Chelmer Model as
“a reliable and robust forecasting mechanism employed by many local authorities”.
 - b. APP/H1840/A/12/2171339: regarding Station Road, Honeybourne Worcestershire the Planning Inspector stated in determining the 5 year land supply:

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"More up to date information is available in the CLG 2008 projections and the 2010 population figures adjusted using the Chelmer Model are now available and relevant"

- a. Pulley Lane, Droitwich Spa decisions by the Secretary of State (APP/H1840/A/13/2199085 and APP/H1840/A/13/2199426) in which the Secretary of State (paragraph 14) supports the Inspectors findings (Paragraph 8.48) with regard to the approach taken by Mr Bateman (in which he utilised the Chelmer model) and stated:

"The only robust evidence that is before me is the methodology used by Mr Bateman. This is clear, well reasoned and well justified. As such, Mr Bateman's figure for a requirement of about 14,263 dwellings between 2006 and 2030 should be preferred."

The Evidence Base

The starting point

- 5.17 The 2012 Sub National Population projections take into account 2011 Census results in terms of population age and sex.
- 5.18 The 2011 interim Household projections provide Household representation rates which go to 2021. These model forward the negative impact of undersupply and recession, for example the inability of under 35's to enter the housing market and so these assumptions model forward the present situation of more under 35's staying at home and a greater number of unrelated adults living together (shared housing).

Changes made to the DCLG assumptions

- 5.19 **Activity Rates** - These have been amended to take into account rising pension ages. This increases the level of labour force that might be expected to be accommodated in the same number of dwellings. In order to reflect the changes to the pensionable age the following changes have been made:
 - a. Males 60 to 64 age group has been increased by a total 5.6% between 2011 and 2021 and then held constant. This equates to 3.3 percentage points (see table 19 below)

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- b. Males 65 to 69 age group has been increased by 11.6% between 2011 and 2021 and then held constant. This equates to 1.8% percentage points (see tables 19 and 20 below).
- c. Females 60 to 64 age group has been increased by 33.4% between 2011 and 2021 and then held constant. This equates to 9.5 percentage points (see table 19 and 20 below)
- d. Females 65 to 69 age groups increased by 16.3% between 2011 and 2021 and then held constant. This equates to 3.5 percentage points (see table 19 and 20 below)

Table 18 Activity rates from the Chelmer Model

Males	2006-11	2011-16	2016-21	2021-26	2026-31
60-64	57.7%	59.3%	61.0%	61.0%	61.0%
65-69	15.4%	16.3%	17.2%	17.2%	17.2%
Females	2006-11	2011-16	2016-21	2021-26	2026-31
60-64	28.3%	32.7%	37.8%	37.8%	37.8%
65-69	21.3%	23.0%	24.8%	24.8%	24.8%

Table 19 Activity rates from the Chelmer Model - Percentage points increase from 2011

Males	2011-16	2016-21	2021-26	2026-31	2031-36
60-64	1.6%	3.3%	3.3%	3.3%	3.3%
65-69	0.9%	1.8%	1.8%	1.8%	1.8%
Females	2011-16	2016-21	2021-26	2026-31	2031-36
60-64	4.4%	9.5%	9.5%	9.5%	9.5%
65-69	1.7%	3.5%	3.5%	3.5%	3.5%

5.20 The approach I have adopted is based upon the ONS assessment of the changes of the state pension age as set out in Edge Analytics report of January 2014 which stated:

'ONS published its last set of economic activity rate forecasts from a 2006 base (ONS January 2006, Projections of the UK labour force, 2006 to 2020). These incorporated an increase in SPA for women to 65 by 2020 but this has since been altered to an accelerated transition by 2018 plus a further extension to 66 by 2020. Over the 2011–2020 period, the ONS forecasts suggested that male economic activity rates would rise by 5.6% and 11.9% in the 60-64 and 65-69 age groups respectively. Corresponding female rates would rise by 33.4% and 16.3% (Figure 14). Given the accelerated pace of

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change in the female SPA and the clear trends for increased female labour force participation across all age-groups in the last decade, these 2011–2020 rate increases would appear to be relatively conservative assumptions.'

Chart 7: Extract from Edge Analytics

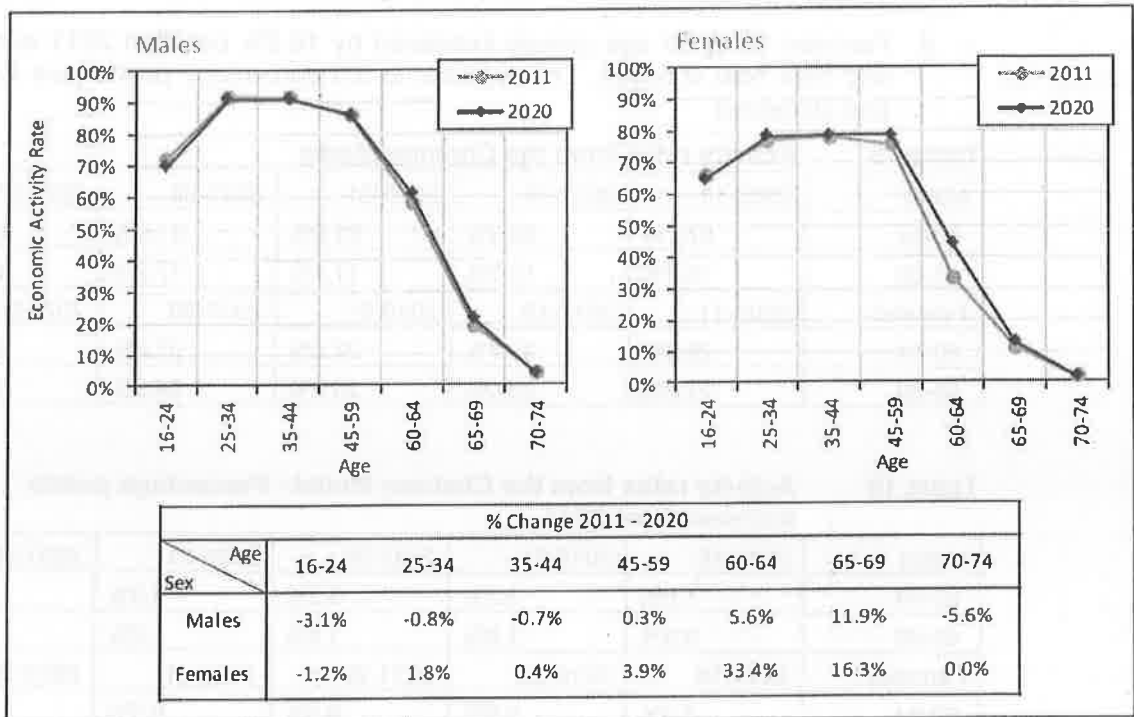


Figure 14: ONS Labour Force Projection 2006 – Economic Activity Rates 2011–2020. Data source: ONS Source Edge Analytics (December 2013)

5.21 The increases are slightly higher than those found as being realistic by the Inspector at the South Worcestershire Development Plan (paragraph 34 page 7 Inspectors interim conclusions on the stage 1 matters & paragraph 4.13.3 page 15 NLP Miller Strategic Land “Updated Assessment of Housing Requirements to inform Examination matter 1”). In that case, the following assumptions were considered to represent a reasonable response to the changes to the pension age:

- a. Males 60 to 64: No change
- b. Males 65 to 69: 2 percentage points between 2012 and 2018.
- c. Females 60 to 64: 8 percentage points between 2012 and 2018.
- d. Females 65 to 69: 2 percentage points between 2012 and 2018.

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5.22 In reaching the conclusion to use the rates in Tables 19 and 20 above I have also taken into account the following:

- a. The findings of the Institute of Fiscal Studies “Incentives, shocks or signals: labour supply effects of increasing the female state pension age in the UK” (IFS Working Paper W13/03) this found the impact of raising the state pension age was 7.3 percentage points for women and a corresponding increase of 4.2 percentage points in their male partners employment rates (page 28). This suggests that an increase in the activity rates for males in the 60 to 64 age group is appropriate.
- b. Table 4 of the “When the State Pension Age will increase to 66 Equality Assessment January 2011” which suggests the bringing forward of the state pension age to 66 will have an additional impact of increasing the numbers in employment by just over 4% at 2020 but that this impact will reduce to under 1% by 2026 (table 4). The impact of this change is only slight and temporal so has not been incorporated into the model.

5.23 **Unemployment** – For employment led projections an allowance has been made for the number of unemployed in the district to drop by 1,600 from 3,000 in 2011 (Nomis) to 1,400 in 2031. This reflects the lowest level of unemployment in the last decade 2006. It is noted that as at 2012 the figure was 2,100 (Nomis).

5.24 **Household representation rates** – these are the default in the model which are based on the 2011 interim household projections. The Household Representation Rates have been based on the 2011 interim CLG projections to 2021 (the last year for which they are available), but then growth rates from the 2008-based projections applied from 2021 onwards. This approach does not therefore catch up with the long term trends by 2031 and as such could still represent a level of unmet demand.

5.25 **Migration** – as explained in the summary of the projections below, different future levels of migration have been assumed as part of testing the objectively assessed housing need. This approach is in accordance with the Guidance as the projections are testing the likely future scenarios.

5.26 Summary of projections and associated assumptions:

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5.27 Below is a brief summary of the various projections considered, and their underlying assumptions:

- a. **Dwelling led: 350 Dwgs SHMA** - In this projection the migration is to be determined by the level of dwelling proposed in the recently published SHMA.
- b. **Dwelling led: 510 Dwgs RSS** - In this projection the migration is to be determined by the level of dwelling proposed in the Revoked Regional Spatial Strategy which was based upon the findings of the LLHR.
- c. **2012 SNPP** – In this projection the level of population is determined by the 2012 SNPPs.
- d. **2012 SNPP PA** – In this projection the level of population is determined by the 2012 SNPPs. An amendment has been made to increase the activity rates of the 60 to 70 age groups as explained above.
- e. **Baseline headship rate and pensionable age adjusted (Baseline HRR PA)**
- The baseline projection is migration led, targeting mid-year population estimates to 2011 and migration thereafter, where migration projections are calculated using 5-year moving averages. In this case amendments have been made to increase household formation in the 20 – 35 age groups to reflect an improving housing market for these ages. A further amendment has been made to increase the activity rates of the 60 to 70 age groups as explained above.
- f. **Experian 2013 (SHMA 2014 table 20)** – In this projection the future levels of migration have been amended so that the future labour force will expand to meet the Experian 2013 projection referred to in this study of 515 jobs a year. The increase to the labour force has been reduced to reflect some 1,600 persons unemployed at 2011 re-entering the workforce during the period to 2031. This results in an overall target increase in the workforce of 8,700 and an annual rate of 435 persons a year. No modification has been made to reduce the level of additional workers to reflect present commuting patterns as it is considered the present levels of in commuting are unsustainable.

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Table 20 Calculation of required levels of labour force growth to meet job growth

Source	Document	Projected Job Growth	Total 2001 to 2031	Reduction in unemployment	Total new additions to labour force	Annual Change in labour Force
Oxford Economics	Leicester and Leicestershire Employment Land Study Employment: Roger Tym and partners January 2012	498	9,963	1,600	8,363	418
PACEC (Public and Corporate Economic Consultants)	Leicester and Leicestershire HMA Employment Land Study PACEC January 2013	395	7,900	1,600	6,300	315
Experian 2013	GL Hearn	515	10,300	1,600	8,700	435
Experian 2014	Barton Wilmore OAN	327	6,540	1,600	4,940	247

- 5.28 The summary of these projections, undertaken with the Chelmer Model, are set out in the Table 22.
- 5.29 In light of the Framework, to plan positively would be to plan for the employment led projections and the preference again must be for the higher of these projections in order that the future planning provision should not act to impede economic growth.
- 5.30 Although planning to meet economic projections is a risk, these are included by the Council as part of their evidence base and are undertaken by well recognised consultants. Whilst such projections are liable to fluctuation, the risk is offset by the fact that if these projections are overly optimistic then the planned level of provision will provide for development for a further period beyond the end of the plan. This in itself is an advantage given the relative inflexibility of the UK planning system to respond to future change.

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Table 21 Summary of Chelmer Projections for North West Leicestershire

	2011-2016	2016-2021	2021-2026	2026-2031	Total 2011 to 2031	Ave 2011 to 2031
Dwelling change						
350 Dwgs	350	350	350	350	7,000	350
510 Dwgs RSS	510	510	510	510	10,200	510
2012 SNPP	150	308	254	307	5,090	255
2012 SNPP (Baseline HRR AP)	150	308	254	307	5,090	255
Baseline HRR PA	404	375	399	411	7,944	397
Experian 2013 (Baseline HRR PA)	549	574	731	749	13,016	651
Labour force change	2011-2016	2016-2021	2021-2026	2026-2031	Total 2011 to 2031	Ave 2011 to 2031
350 Dwgs	16	-22	-20	90	325	16
510 Dwgs RSS	303	217	184	282	4,922	246
2012 SNPP	8	-64	-115	-87	-1,291	-65
2012 SNPP (Baseline HRR AP)	128	-6	-77	-55	-52	-3
Baseline HRR PA	188	93	-100	-63	589	29
Experian 2013 (Baseline HRR PA)	447	441	434	415	8,688	434
Population change	2011-2016	2016-2021	2021-2026	2026-2031	Total 2011 to 2031	Ave 2011 to 2031
350 Dwgs	711	766	734	607	14,087	704
510 Dwgs RSS	1,159	1,195	1,144	1,007	22,523	1,126
2012 SNPP	426	460	460	420	8,830	442
2012 SNPP (Baseline HRR AP)	426	460	460	420	8,830	442
Baseline HRR PA	753	743	724	577	13,989	699
Experian 2013 (Baseline HRR PA)	1,164	1,318	1,639	1,455	27,879	1,394
Migration	2011-2016	2016-2021	2021-2026	2026-2031	Total 2011 to 2031	Ave 2011 to 2031
350 Dwgs	467	457	421	415	8,802	440
510 Dwgs RSS	915	844	763	733	16,275	814
2012 SNPP	219	218	240	311	4,936	247
2012 SNPP (Baseline HRR AP)	219	218	240	311	4,936	247
Baseline HRR PA	509	503	503	503	10,098	505
Experian 2013 (Baseline HRR PA)	920	1,036	1,326	1,220	22,510	1,126

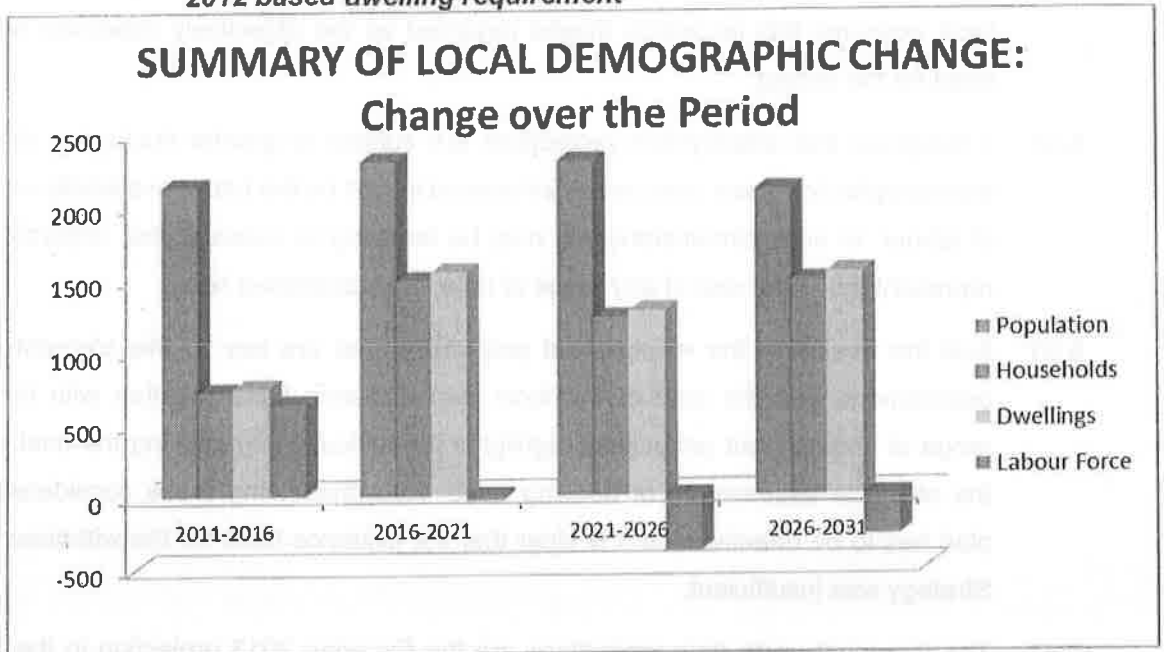
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Commentary on output of modelled scenarios

- 5.31 As the objectively assessed housing need has to take into account the needs of the local economy this projection maybe regarded as the objectively assessed housing need for the district.
- 5.32 I recognise that employment projections are subject to greater fluctuation than the demographic forecasts and can be influenced in part by the future availability and cost of labour. In such circumstances it may be tempting to consider this requirement to represent the upper end of any range of objectively assessed need.
- 5.33 It is the quality of the employment projections that are key to this element of the assessment, and the date of the local plan evidence base together with the wide range of employment projections highlights the difficulty in modelling the final step in the objective assessment of housing need. Notwithstanding these considerations a plan has to be effective and it is clear that the evidence base for the withdrawn Core Strategy was insufficient.
- 5.34 The two most up to date projections are the Experian 2013 projection in the SHMA (515 jobs a year page 94 table 20) and the Experian 2014 projection in Barton Wilmore's OAN report (327 jobs a year page 43 table 5.2). These would require the labour force growth of between 247 and 434 persons a year (see table 22). The lower of these two projections would result in a dwelling requirement commensurate with that in revoked RSS and withdrawn Core Strategy i.e. 510 dwellings a year. The higher of the two projections would require some 651 dwellings a year and delivers a level of job growth just slightly above that which would result from the 3 employment projects highlighted earlier.
- 5.35 The charts show the implications of the proposed level of dwelling provision in the withdrawn Core Strategy and compares these to the dwelling requirement to meet the 2012 SNPP. Chart 11 shows that while there will be population growth in the district if the level of housing is provided to meet the 2012 SNPP there will only be an increase in the labour force in the period to 2016 after which there will be a decline in available labour.

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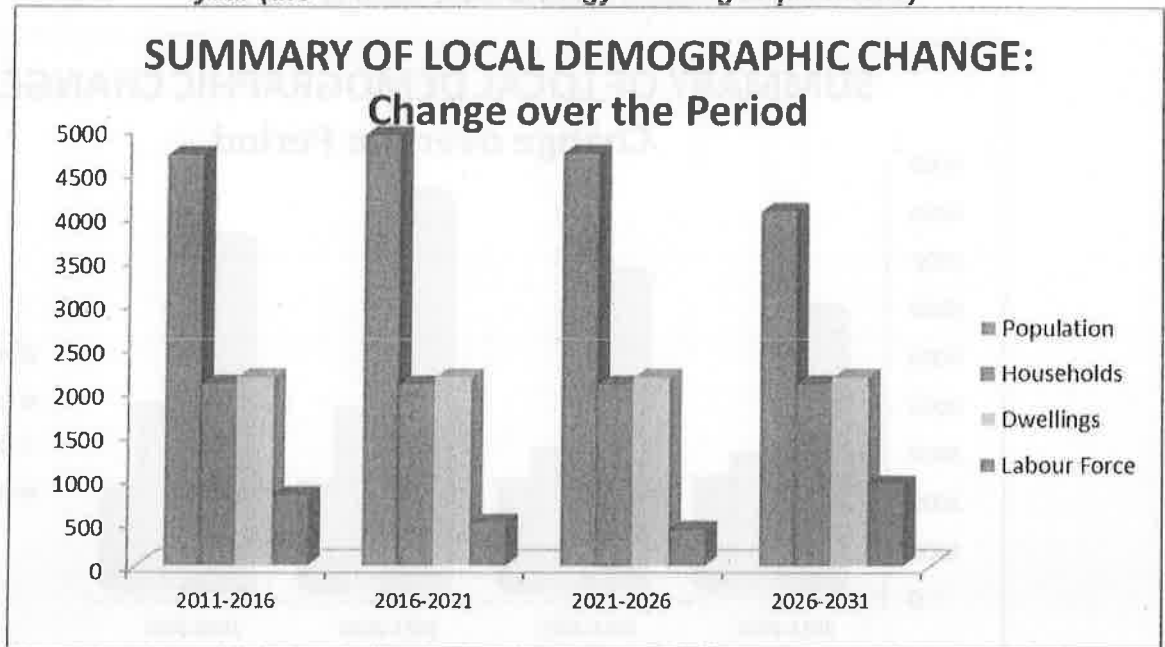
Chart 8: Summary of demographic change as a result of the SNPP interim 2012 based dwelling requirement



5.36 Chart 12 illustrates that the higher level of housing provision proposed by the now revoked Core Strategy would have provided a higher level of population growth than the 2012 SNPP and consequently an increase rather than a decrease in the labour force.

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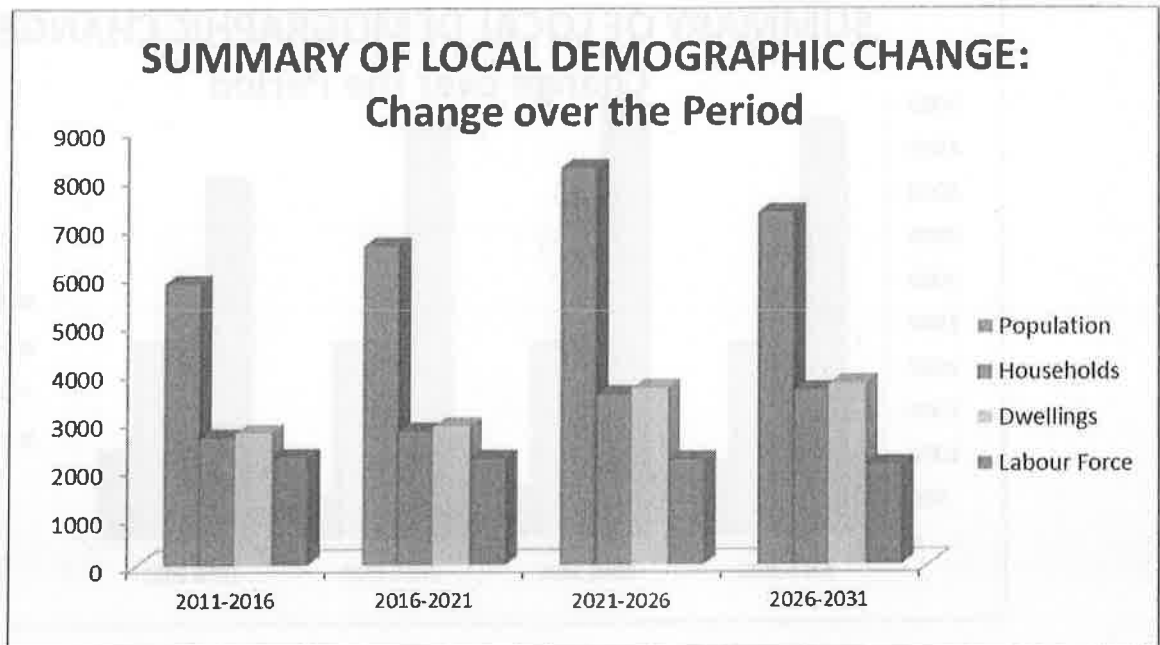
Chart 9: Summary of demographic change as a result of 510 dwellings a year (the revoked Core Strategy dwelling requirement)



5.37 Chart 13 shows the outcome of the projection of the level of dwelling provision required to meet the 515 additional jobs a year. This would require an average increase in the labour force of some 435 persons a year (see table 22 above). As would be expected this results in higher level of population growth and a greater housing requirement. It should be noted that this level of job growth is about half of the level of job growth that has occurred in the last decade (including the recession).

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Chart 10: Summary of demographic change as a result of the migration to meet the 10,296 jobs (515 jobs a year and 435 workers a year)



Commentary of differences between this assessment of housing needs and the GL Hearn SHMA 2014 assessment of housing need

5.38 At first glance the difference between my Experian 2013 based projection of 651 dwellings a year and the SHMA projection of 350 dwellings (PROJ 4) appears irreconcilable.

5.39 In Section 3, I have already highlighted the assumptions regarding employment growth and its distribution made by the GL Hearn Report and these are summarised in table 9. Below I provide a more detailed analysis of how differences in these assumptions explain the variation between the GL Hearn conclusions and my own. I attempt to quantify the impact of each of the assumptions. Given that the assumptions will interact with each other the values attributed to each of the assumptions will only be approximate.

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Assumption 1: Number of additional workers required to meet job growth.

- 5.40 The approach used in the GL Hearn Report does not attempt to match workforce change to job growth but to apply a percentage increase to the recorded working population (paragraph 5.50).
- 5.41 The GL Hearn argue that this takes into account both commuting patterns and double jobbing.
- 5.42 In terms of commuting patterns the GL Hearn Report has not considered if the current pattern of commuting is sustainable as required by the guidance (Paragraph: 018 Reference ID: 2a-018-20140306)
- 5.43 In light of the evidence of increased levels of in commuting from the surrounding district I have taken the position that in order to prevent the continuation of this trend the council should seek to provide housing to match future employment growth.
- 5.44 The GL Hearn Report on the other hand adopts an approach which provides housing for 0.78 of a worker per job as illustrated in table 23.

Table 22 Ratio of workers to jobs in GL Hearn Report PROJ 3

LA/UA/Borough	Experian Projection Change in Jobs 2011 to 2036 (GL Hearn table 20)	Change in labour force (GL Hearn Proj 3)	Impact of sustaining existing commuting patterns	Ratio of new workers (Proj 3) to new jobs	Source
Blaby	8,414	7,136	-1,278	0.85	Fig B45 & B46
Charnwood	8,569	9,594	1,025	1.12	Fig 49 & B50
Harborough	10,813	11,185	372	1.03	Fig B53 & B54
Hinckley & Bosworth	6,650	8,077	1,427	1.21	Fig B57 & B58
Leicester	15,130	11,728	-3,402	0.78	Fig B41 & B42
Melton	2,087	2,405	318	1.15	Fig B61 & B62
NW Leicestershire	12,370	9,696	-2,674	0.78	Fig B65 & B66
Oadby& Wigston	1,290	1,647	357	1.28	Fig B69 & B70
LLLPA	65,324	61,468	-3,856	0.94	

- 5.45 This assumes continued rising levels of in commuting to the district to meet the projected level of employment growth.

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5.46 This assumption reduces the level of workers being planned for North West Leicestershire by 22% as illustrated in Table 24.

Table 23 Impact of continued levels of in commuting

	Total Jobs			Job Growth		Job Growth Per Year	
	2011	2031	2036	2031	2036	2031	2036
Forecast Increase in Jobs							
Table 20	59,045	69,341	71,415	10,296	12,370	515	495
PROJ 3 Fig B65							388
Change to allow continued pattern of in commuting							107
Percentage reduction							22%

Assumption 2: Redistribution of Employment Growth

5.47 The reduced level of jobs in the GL Hearn Report has then been redistributed based upon current job distribution according to paragraph 5.54. The impact of this is that projected Job Growth is directed away from Harborough and NW Leicestershire and into Leicester, Charnwood, Melton and Oadby & Wigston. The impact of this assumption is illustrated in Table 25.

Table 24 Redistribution of Employment Growth

LA/UA/Borough	Change in labour force (Proj 3)	Change in labour force (Proj 4)	Impact of redistribution of job growth
Blaby	7,136	6,408	-728
Charnwood	9,594	10,541	947
Harborough	11,185	5,879	-5,306
Hinckley& Bosworth	8,077	7,146	-931
Leicester	11,728	18,201	6,473
Melton	2,405	3,488	1,083
NW Leicestershire	9,696	6,140	-3,556
Oadby& Wigston	1,647	3,493	1,846
LLLPA	61,468	61,296	-172

Source: SHMA 2014 Tables B54, B58, B62, B66, B70 B46, B50 and Appendix 20

5.48 It is noted that the resulting distribution does not appear to reflect the distribution of jobs as at 2011 as set out in table 20 of the SHMA as illustrated below:

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Table 25 Distribution of current jobs and proposed distribution on PROJ4

LA/UA/Borough	Change in labour force (Proj 4)	Percentage distribution in Proj 4	Percentage distribution 2011 Jobs Table 20
Blaby	6,408	10%	12%
Charnwood	10,541	17%	14%
Harborough	5,879	10%	9%
Hinckley& Bosworth	7,146	12%	9%
Leicester	18,201	30%	36%
Melton	3,488	6%	5%
NW Leicestershire	6,140	10%	12%
Oadby& Wigston	3,493	6%	4%
LLLPA	61,296	100%	100%

Source: SHMA 2014 Table 20 and Tables B46, B50, B54, B58, B62, B66, B70 and Appendix 20

- 5.49 I have highlighted earlier that this is because the redistribution appears to have been based upon resident workers as recoded by the 2011 census.
- 5.50 The impact of these two assumptions is significant in terms of the resulting level of labour force growth that is required in each district as table 27 below illustrates.
- 5.51 Table 27 highlights that for the 12,370 jobs projected to be generated in NW Leicestershire between 2011 and 2036 (Experian 2013) the SHMA only models for an increase in the labour force of 6,140 persons i.e. it is modelling for only half of the projected growth.

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Table 26 Combined impact of assumptions regarding future commuting patterns and redistribution of employment growth

LA/UA/Borough	Change 2011 to 2036 SHMA table 20	Change in labour force (Proj 3)	Change in labour force (Proj 4)	Impact of sustaining existing commuting patterns	Impact of redistribution of job growth	Combined effect of retaining existing commuting patterns and redistribution
Blaby	8,414	7,136	6,408	-1,278	-728	-2,006
Charnwood	8,569	9,594	10,541	1,025	947	1,972
Harborough	10,813	11,185	5,879	372	-5,306	-4,934
Hinckley& Bosworth	6,650	8,077	7,146	1,427	-931	496
Leicester	15,130	11,728	18,201	-3,402	6,473	3,071
Melton	2,087	2,405	3,488	318	1,083	1,401
NW Leicestershire	12,370	9,696	6,140	-2,674	-3,556	-6,230
Oadby& Wigston	1,290	1,647	3,493	357	1,846	2,203
LLLPA	65,324	61,468	61,296	-3,856	-172	-4,028

Time period of the projection

5.52 As employment growth and household growth are projected to fall post 2031 the approach of the SHMA to extend the plan period to 2036 has the effect of decreasing the average dwelling requirement across the whole of the plan period. This does not matter if one is making allocations for the whole of the plan period but if one is considering a short time period then this should be borne in mind.

5.53 For the purpose of a five year land supply calculation I would prefer the use of the figure to 2031 as this reflects the higher levels of demand that are likely to occur in the next few years.

Other assumptions: Household Representation Rates and Activity rates

5.54 Although these assumptions will account for some of the variation it would appear that the two most important assumptions to explain the difference between the approach adopted by the SHMA 2014 and my work are the two assumptions highlighted above.

Summary of difference of approach

5.55 Table below explains how the impact of the assumptions in the GL Hearn report can substantially reduce the level of housing need while appearing to start with the same job forecast of 515 jobs a year 2011 to 2031.

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Table 27 Explanation of differences between Experian 2013 based projections and the GL Hearn projection

	SPRU Chelmer OAN	Percentage
Experian 2011 to 2031	651	
Impact of lower growth in 2031 to 2031 on ave for earlier period	23	6%
Allowance for double jobbing	69	17%
Impact of additional commuters into District	85	21%
Impact of assumed lower rate of employment growth (redistribution of growth to other locations in SHMA).	205	51%
Other (household representation rates activity rates etc.)	22	6%
PROJ4	246	
Total difference	405	100%

Conclusion on objectively assessed need for housing

- 5.56 The starting point for deriving objectively assessed need for housing according to the NPPG (Paragraph: 030 Reference ID: 3-030-20140306) are the Government's own Subnational Population Projections (SNPP). These projections provide consistency across the country and as such are a valuable tool in determining future housing needs. These projections are tested so that they are consistent with the national projections; they do not however take into account future policy decisions.
- 5.57 In particular, in recent decisions on development plans, Inspectors have emphasised the requirement for the objectively assessed need to reflect the future needs of the local economy and that local planning authorities should ensure that their assessment of, and strategies for housing and employment are integrated, taking full account of relevant market and economic signals (Framework paragraph 158).
- 5.58 The dwelling requirement from the 2012 SNPP of just 255 dwellings a year cannot be considered to meet the objectively assessed need as it models in the negative impact of the previous undersupply and the recession in terms of both migration and Household Representation Rates. These trends are also linked to a period of significant increases in the level of additional in commuting into the district suggesting an imbalance of employment growth and housing provision.
- 5.59 The 2012 SNPP based projection also performs poorly when compared to both past rates of job growth and future projections of job growth. Even taking into account the

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changes to unemployment and pension age it provides no growth in the local labour force. This compares to the previous rate of job growth over the last decade of over 1,000 jobs a year and the recent projections which suggest between 508 and 626 jobs a year in the Experian projections of 2013 and 2014.

- 5.60 In these circumstances the housing need should reflect a range of employment led forecasts which suggest a level of between 510 and 651 dwellings a year as projected by the Chelmer Model.
- 5.61 What is clear from more recent work and Inspectors' decisions at development plan Examinations is that this simple "demographic" approach which takes no account of the likely economic needs of the area will not be found to be "soundly based".
- 5.62 In light of the approach required to consider other factors relating to the economy, market demand and the overriding requirement to plan positively and prevent planning from being an impediment to economic growth, the figure of 651 dwellings a year should be used for the calculation of the five year land supply for the district.
- 5.63 This level of dwelling provision will support employment growth of 515 jobs a year by adding an average of some 434 to the labour force each year which is still substantially below the level of growth achieved in the last decade taking account of the recession.

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6.0 THE DISTRIBUTION OF OBJECTIVELY ASSESSED NEED

- 6.1 The Objectively Assessed Need for housing for North West Leicestershire has yet to be set but this assessment recommends a figure of 651 dwellings a year. While it is recognised that there may be a variety of reasons to justify the distribution of dwellings throughout a borough, it might be expected that reasonably sized settlements with a range of facilities would be expected to accommodate a higher level of provision with lower levels of provision being allocated to the rural areas and smaller villages. The future distribution will also need to take into account constraints within and adjacent to the settlement.
- 6.2 The starting point for the Objectively Assessed Need for the settlement is however a “policy off” position. In such circumstances the most robust assumption would be that each area of the district shares similar characteristics and will attract similar levels of migration. Undertaking detailed modelling at the sub district level would require assumptions to be made with regard to the apportionment of migration flows for which there is no detailed information and as such would detract from the robustness of any conclusion. The most robust way, therefore, is to distribute the requirement for new housing based upon the relative size of the settlement.
- 6.3 This second assessment is higher than that considered in the previous Core Strategy which was subject to a Sustainability Assessment and so care should be exercised over applying the higher end of this range.

Table 28 Apportionment of Projected Housing Requirement

Name	Total population	% pop	2014 Experian	2013 Experian
North West Leicestershire	91,258	100%	10,200	13,016
Rural (North West Leicestershire)	19,499	21%	2,142	2,733
Donisthorpe	4188	5%	510	651
Swadlincote(part of)	313	0%	0	0
Coalville	34,072	37%	3,774	4,816
Ashby-de-la-Zouch	12,105	13%	1,326	1,692
Castle Donington	6,501	7%	714	911
Ibstock	5,833	6%	612	781
Measham	5,148	6%	612	781
Kegworth	3,599	4%	408	521

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Table 29 Apportionment of Projected Housing Requirement

Name	Total population	Redistribution of Rural area	Baseline HRR PA Jobs PACEC	Baseline HRR PA Jobs RTP FLT
North West Leicestershire	91,258	100%	10,200	13,016
rural (North West Leicestershire)	19,499	10%	1,020	1,302
Donisthorpe	4,188	6%	612	781
Swadlincote(part of)	313	0%	0	0
Coalville	34,072	47%	4,794	6,118
Ashby-de-la-Zouch	12,105	17%	1,734	2,213
Castle Donington	6,501	9%	918	1,171
Ibstock	5,833	8%	816	1,041
Measham	5,148	7%	714	911
Kegworth	3,599	5%	510	651

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7.0 CONCLUSION

- 7.1 North West Leicestershire Local Plan must be prepared in accordance with national planning policy and as such must be justified and consistent with the Framework and take appropriate account of the NPPG. Part of this compliance will require appropriate demonstration of the duty to co-operate as well as the development of a housing requirement which on the basis of an Objectively Assessed Need for housing. It is not appropriate to take forward the preparation of the Local Plan based on the SHMA when further works on the requirement of housing across the housing market area needs to take place.
- 7.2 The Core Strategy was withdrawn partly on the grounds that the Inspector did not consider that the level of dwellings being proposed (431 dwellings a year) represented the full Objectively Assessed Need and secondly the failure to discharge the Duty to Cooperate.
- 7.3 The most up to date evidence are the 2012 SNPPs which take account of the 2011 census and the household representation rates from the earlier 2011 interim household projections. The housing requirement resulting from these projections has been calculated using the Chelmer Model and would suggest a dwellings requirement of 255 dwellings a year for the period 2011 to 2031. This is the new starting point from which to consider the appropriate level of housing requirement in the context of the Framework, including the need to accommodate development to support the local economy and job growth.
- 7.4 In this context the Guidance is clear that Councils are required to consider increasing housing provision in light of evidence which suggests an imbalance of job growth and changes to the working age population, as well as responding to other market indicators such as price and affordability. This approach has also been endorsed by the findings of Inspectors at various Development Plan Examinations. It is clear that the demographic approach has to be augmented by reference to the needs of the local economy.
- 7.5 The OAN for housing therefore needs to be considered in terms of the resulting labour force and the Council's evidence base of, the 379 jobs per year in the PACEC report, and the 498 jobs a year in the Roger Tym and Partners report and lastly the 515 jobs

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- a year in the GL Hearn report 2014. The Chelmer Model has been utilised to project the level of housing required to support the level of employment growth from the Experian 2013 projection in the GL Hearn report.
- 7.6 The more up to date Experian projection of 327 jobs a year which would require some 247 persons to be added to the labour force has not been modelled separately as the former level of housing proposed in the Core Strategy of 510 dwellings a year would result in this level of additional workers according to the results of the Chelmer Model.
- 7.7 The range of dwelling provision required to meet the two Experian projections of job growth would be between **510 and 651 dwellings a year**.
- 7.8 These levels of employment growth are substantially below past rates of growth of almost 1,100 jobs a year so a dwelling requirement of 651 dwellings a year based upon the highest of these rates (515 jobs a year) would appear to be a reasonable assumption.
- 7.9 On consideration of the above it is suggested that the most appropriate assessment of the objectively assessed need for housing in North West Leicestershire is represented by the higher of the employment led projections of 651 dwellings a year. This is based upon what may be considered to be an optimistic level of employment creation, but this does not appear unrealistic given it is much less than previous recorded growth.
- 7.10 A partial return to the 2008 based Household Representation Rates effectively “plans in” improvements to affordability and access to housing for younger age groups allowing them to form more traditional households. These assumptions are considered appropriate as they are in accordance with the Framework, in particular paragraph 21 in terms of supporting the economy, paragraph 47 in respect of significantly increasing the supply of housing and paragraph 50 which requires decisions to widen the choice of high quality homes and of home ownership. Perhaps most importantly they are in accordance with the requirement to plan positively (paragraph 182) and are at a level which allows for the integration of the strategies for housing and employment taking full account of relevant market and economic signals (paragraph 183).
- 7.11 Evidence in the recently published Leicester and Leicestershire SHMA (June 2014) suggests that the objectively assessed need is between 285 and 350 dwellings for the

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period to 2031. On its own terms this assessment has not sought to integrate the employment policies as set out by the LEP with the level of housing provision (paragraph 9.30). It identifies this as additional work that is required to be undertaken. The higher level of dwelling provision is only calculated to meet a projected employment growth of 246 jobs a year (to 2036 Fig 65) and that this is substantially lower than that which would result for planned projects in the district and indeed is lower than the Experian projection that underlies the report. The justification for the reduction in the expected level of employment growth is that the authors make an assumption to redistribute projected employment growth to other areas, discounting the strategic rail freight proposal and assume a reduction in growth related to East Midlands Airport (paragraph 5.54). Both these assumptions would appear to contradict the direction of the LEP plans.

- 7.12 I have also considered the Leicester and Leicestershire Housing Market Area "Objective Assessment of Housing Need" June 2014 by Barton Wilmore. This report uses a lower level of employment projection but adds to this the implications of the LEP proposal to arrive at an employment growth figure of 835 jobs a year (16,707 in total) and a dwelling requirement of **836 dwellings** a year taking into account meeting economic and affordable housing needs.
- 7.13 I note that the Inspector criticised the Barton Wilmore approach as being a "policy on" approach for attempting to secure this integration of housing and economic strategies as required by paragraph 158 of the Framework. I further note that this is a different interpretation to the approach to defining the objectively assessed need to that I have observed elsewhere in terms of both development plan examinations and appeals.
- 7.14 In these representations I have not attempted to model the impact of the policies of the Strategic Economic Plan of the LEP but have relied upon the same evidence base as the Council's consultants. I have not redistributed this growth but assumed that it will occur within the district were the Experian projections project it to occur. The evidence for my approach may be summarised as follows:
- a. the projection itself identifies the growth occurring within the district due to the nature and type of industries that exist with the district,

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- b. the policy context would appear to continue to support employment growth in the district (SEP's Flagship Proposal 21 focuses on delivering investment and jobs across five Growth Areas and four Transformational Priorities including East Midlands Airport and the Coalville to Ashby Growth Corridor),
 - c. there are significant employment proposals currently being promoted in the district,
 - d. increased in commuting as assumed in the GL Hearn approach is not sustainable.
- 7.15 None of the above would suggest constraints or other reasons for a departure from the Experian employment led projection based upon past trends.
- 7.16 Given the employment growth, both in terms of projections but also in terms of policies and proposals, I would suggest that the objectively assessed need for housing is at the top of the range at **651 dwellings a year** (this is based upon 515 jobs a year from the 2013 Experian projection in the GL Hearn report) and is considered as the Objectively Assessed Need for housing.

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Representor 44
4413/4.5/0



LOCAL PLAN

Ref:

(For official use only)

Publication Stage Representation Form

North West Leicestershire Local Plan Proposed Submission

Please return this form to North West Leicestershire District Council either by post:

Planning Policy, North West Leicestershire District Council, Council Offices, Whitwick Road, Coalville LE67 3FJ or email planning.policy@nwleicestershire.gov.uk no later than **5pm on 15 August 2016**.

This form has two parts-

Part A – Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

2. Agent Details

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details for the agent in 2.*

Title		
First Name		
Last Name		
Job Title (Where relevant)		
Organisation (Where relevant)	Hallam Land Management Ltd	Sigma Planning Services
Address Line 1	Banner Cross Hall	Sigma House
Line 2	Sheffield	6 Garden Street
Line 3		Tunbridge Wells
Line 4		Kent
Post Code	S11 9PD	TN1 2XB
Telephone Number		
Email Address (Where relevant)		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Policies Map

4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Objective 6 – the particular focus on the regeneration of Coalville needs to be reassessed in favour of other larger settlements in the District. A Coalville focus has been the objective of past plans, but the town has demonstrated a fragility of market attraction and infrastructure provision which, together with environmental and landscape constraints, held back the delivery of housing and employment in the past. This impediment to the delivery of housing should be recognised and addressed by the plan and should not be encouraged to continue. A broader focus on other main towns, particularly Ashby-da-la-Zouch, is required.

(Continue on a separate sheet/expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Re-word Objective 6 as follows:-

“Enhance the vitality and viability of the District’s main town and local centres with a particular focus on Coalville and Ashby-de-la-Zouch.”

(Continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order to explain to the Inspector the full reasoning behind the representation and to participate in any discussion that there may be in regard to relevant topics arising from these representations.

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Date:

Representation 44:
44/4/52/0



LOCAL PLAN

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Publication Stage Representation Form

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Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

2. Agent Details

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details for the agent in 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text"/>
Organisation <i>(Where relevant)</i>	Hallam Land Management Ltd	Sigma Planning Services
Address Line 1	Banner Cross Hall	Sigma House
Line 2	Sheffield	6 Garden Street
Line 3	<input type="text"/>	Tunbridge Wells
Line 4	<input type="text"/>	Kent
Post Code	S11 9PD	TN1 2XB
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address <i>(Where relevant)</i>	<input type="text"/>	<input type="text"/>

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Policies Map

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

i) Legally Compliant

Yes

No

ii) Sound

Yes

No

iii) Complies with the
Duty to co-operate

Yes

No

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Ashby-de-la-Zouch should be elevated to the status of a principal town. It has a significantly greater population than any of the other settlements apart from Coalville and has a range of services of similar scale and of a better quality than Coalville. As a result it is a more attractive location for people to live and is better suited than Coalville to meet the demand for market housing in accordance with Paragraph 47 of the NPPF. It should therefore have equal status with Coalville in the settlement hierarchy as it did under the former Local Plan and the Leicestershire Structure Plan.

(Continue on a separate sheet/expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order to explain to the Inspector the full reasoning behind the representation and to participate in any discussion that there may be in regard to relevant topics arising from these representations.

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Date:

Representation 44
44/5/4110



LOCAL PLAN

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Publication Stage Representation Form

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Part A

1. Personal Details

2. Agent Details

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details for the agent in 2.*

Title		
First Name		
Last Name		
Job Title <i>(Where relevant)</i>		
Organisation <i>(Where relevant)</i>	Hallam Land Management Ltd	Sigma Planning Services
Address Line 1	Banner Cross Hall	Sigma House
Line 2	Sheffield	6 Garden Street
Line 3		Tunbridge Wells
Line 4		Kent
Post Code	S11 9PD	TN1 2XB
Telephone Number		
Email Address <i>(Where relevant)</i>		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Policies Map

4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Planning consents that lapse should not be renewed without careful analysis and assessment of the reason why they have not been implemented. They should then be judged against the policies of the Development Plan and the NPPF with no pre-ordained outcome. The fact that planning consent was previously granted is a material consideration, but it is important that housing is delivered. Sites that have failed to deliver and where there is no obvious change in their circumstances should not have the benefit of a renewal of their planning consent because this may prevent another site or sites that are deliverable from coming forward.

(Continue on a separate sheet/expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete Policy H1.

(Continue on a separate sheet/expand box if necessary)

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9. Signature:

Date:

Representor 44
44/6/44/0



LOCAL PLAN

Ref:

(For official use only)

Publication Stage Representation Form

North West Leicestershire Local Plan Proposed Submission

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This form has two parts-

Part A – Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

2. Agent Details

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details for the agent in 2.*

Title		
First Name		
Last Name		
Job Title <i>(Where relevant)</i>		
Organisation <i>(Where relevant)</i>	Hallam Land Management Ltd	Sigma Planning Services
Address Line 1	Banner Cross Hall	Sigma House
Line 2	Sheffield	6 Garden Street
Line 3		Tunbridge Wells
Line 4		Kent
Post Code	S11 9PD	TN1 2XB
Telephone Number		
Email Address <i>(Where relevant)</i>		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Policies Map

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

- | | | |
|--|------------------------------|--|
| i) Legally Compliant | Yes <input type="checkbox"/> | No <input type="checkbox" value="No"/> |
| ii) Sound | Yes <input type="checkbox"/> | No <input type="checkbox" value="No"/> |
| iii) Complies with the
Duty to co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Recent Government initiatives in relation to low-cost market housing need to be taken into account in policy H4, either as part of the regular affordable housing provision or as a separate part of the policy. The affordable housing target for Ashby-de-la-Zouch should be more ambitious and a proportion of 40% should be achievable if a greater variety of sites were to be allocated which are capable of using existing infrastructure more effectively. The policy should seek 40% affordable housing at Ashby as a target with lower figures being agreed only in response to viability issues in relation of individual sites being demonstrated by the developer.

(Continue on a separate sheet/expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend Policy H4 to provide a target of 40% affordable housing on sites of 15 or more dwellings in the Ashby-de-la-Zouch area.

(Continue on a separate sheet/expand box if necessary)

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Representation 44
4417/1310.



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Part B - Please use a separate sheet for each representation

Name or Organisation:

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Paragraph(s) Policy Policies Map

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(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="text"/>	No	<input type="text" value="No"/>
ii) Sound	Yes	<input type="text"/>	No	<input type="text" value="No"/>
iii) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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Land north of Ashby-de-Zouch is too large as a single allocation and is unlikely to be fully delivered in the plan period. Issues of connectivity with the town centre have not been resolved and major new infrastructure is required. The site has been identified for housing development for many years but has made no significant progress to date. This is due to a combination of the large scale of the development and the fact that key areas of the site are in different ownerships. The allocation at Ashby-de-la-Zouch should be made on a number of smaller sites that can be delivered more easily and can make financial contributions towards local infrastructure that needs to be improved as a result of the new housing. This should be located in the best position to serve the needs of the town as a whole. Land at South Ashby would provide better choice and flexibility as an additional housing allocation and would also present an opportunity to provide employment land which would to some degree rectify the current imbalance in the location of employment which is currently focussed on the northern side of the town.

(Continue on a separate sheet/expand box if necessary)

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Reduce the scale of the allocation at Moneyhill, Ashby-de-la-Zouch to around 1,000 and identify a new housing allocation for 750 dwellings on land to the south of Ashby at Packington Nook in association with a new employment allocation.

(Continue on a separate sheet/expand box if necessary)

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Representation 44
44 18/TCI/O



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Email Address <i>(Where relevant)</i>	<input type="text"/>	<input type="text"/>

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Policies Map

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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Planning consents that lapse should not be renewed without careful analysis and assessment of the reason why they have not been implemented. They should then be judged against the policies of the Development Plan and the NPPF with no pre-ordained outcome. The fact that planning consent was previously granted is a material consideration, but it is important that housing is delivered. Sites that have failed to deliver and where there is no obvious change in their circumstances should not have the benefit of a renewal of their planning consent because this may prevent another site or sites that are deliverable from coming forward.

(Continue on a separate sheet/expand box if necessary)

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Delete policy EC1.

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LOCAL PLAN

Representation 44
44 19/EC2 10.

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The allocation of the full quota of new employment land to the Moneyhill location as part of a mixed use development scheme is likely to prove ineffective in terms of delivery. Employment land values are generally inadequate to support major new infrastructure provision and the viability of the Moneyhill housing allocation is questionable in terms of the deliverability of housing and affordable housing, even without subsidising the infrastructure required for the employment use. This proposition should be the subject of viability testing with the employment being delivered in phased fashion with the delivery of housing and prior to its completion. A mixed used housing and employment allocation to the south of Ashby would be more deliverable and would address historic issues of the distance from this location to the existing employment areas in the town producing a more balanced settlement pattern, both for existing housing and new housing that could be appropriately located in this area. New allocations should also be made at East Midlands Airport and, on a smaller scale, within the key centres to achieve a wider distribution of employment opportunities across the District.

(Continue on a separate sheet/expand box if necessary)

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Reduce employment allocation at Moneyhill and provide new employment allocation at south of Ashby-de-la-Zouch and East Midlands Airport.

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