

5411/4210

REPRESENTATION TO NORTH WEST LEICESTERSHIRE LOCAL PLAN  
JULY 2016

Charnwood Borough Council welcomes the opportunity to comment on the publication version of the North West Leicestershire Local Plan. We note that the plan period is to 2031 and the imperative to replace the existing development plan for the area which was adopted in 2002. The comments made in this representation reflect the partnership approach to growth and the joint work being undertaken by the Leicester and Leicestershire authorities to meet the needs of the housing market area for the plan period.

Issues

We note the key issues the plan is looking to address (Table 1). Meeting the housing needs of the community whilst at the same time ensuring that the scale of housing and economic growth complement each other are matters to be addressed at a housing market area level as well as at the district level.

Vision

The intention for the East Midlands Enterprise Gateway to be recognised within the Vision (4.5) as a key destination in its own right is noted although the context for this element of the vision is not clear – is it a key destination within the district, the HMA, the country or nationally?

Objectives

Objective 2 should reflect the requirement for homes to also meet the needs of the housing market area (For example see adopted Charnwood Core Strategy Strategic Objective 17).

Housing and Employment Needs

The plan relies on the PACEC study to suggest 5,600 jobs are needed on 96ha of land. The plan also identifies the latest HMA wide and NPPF compliant objective assessment for homes is 285 to 350 homes a year from the SHMA 2014. The plan goes on to refer to the findings of the local study which recommends an increase in the number of homes from 350 a year to 520 a year to accommodate the additional jobs to meet the needs of the SFRI at Castle Donnington. Clearly, the relationship between homes and jobs (new and existing) is dynamic but it is not clear why the SFRI jobs are assumed to be in addition to those identified by PACEC or how that significantly higher housing figure is determined. It is also not clear why the increased housing figure has not had a consequential impact on other development needs, such as that for retail floorspace which continues to be planned for on the basis of 350 homes a year promoted by SHMA 2104.

Agreement on Homes and Jobs

The SHMA 2014 and PACEC 2010 study were both prepared through partnership work across the Housing Market Area under the Duty to Cooperate. The SHMA

2014 remains the most up to date and robust assessment of housing requirements for the HMA, prepared in accordance with the requirements of the Framework (Paragraph 47). The OAN for the HMA and the individual authorities is the subject of the Memorandum of Understanding signed by the HMA partners in November 2014 setting the agreed OAN for homes to 2028. The work that is underway within the HMA to prepare a Housing and Economic Needs Assessment under the Duty to Cooperate will provide new evidence to understand the objectively assessed needs for homes and jobs. That evidence will provide the basis for discussion and agreement on homes and jobs through a revised Memorandum of Understanding. At this time, it is not clear how the figure of 520 homes a year has been derived and the assessment for identifying it has not been prepared in accordance with the Framework's requirement in respect of the housing market area:

Whilst the decision to publish the plan is explained at paragraph 5.9, a commitment to an early review of the plan would not overcome these fundamental issues of soundness. Furthermore, an intention to only review the plan when new evidence suggests 'additional provision' is required does not reflect the existing robust evidence (350 homes per year) nor would it trigger a review of the plan if new evidence suggests the housing requirement should in fact be significantly lower.

The Council is urged to wait for the new evidence of objectively assessed need from the HEDNA before submitting the plan with the support and agreement of its housing market area partners under the Duty to Cooperate. Depending on the scale and distribution of growth this might, in practical terms, mean a new Memorandum of Understanding to provide the strategic context for the plan.

54/2/45/10

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