



**EXAMINATION – MATTERS AND ISSUES
OADBY AND WIGSTON LOCAL PLAN EXAMINATION**

**STATEMENT ON BEHALF OF:
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MATTER 2: Spatial Strategy - Housing

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MATTER 2 Issue 1 Whether the Spatial Strategy is the most appropriate having regard to all reasonable alternatives and the evidence base.

Q1. Is the LP timeframe of 2011 to 2031 appropriate and justified?

Q2. Is the overall housing requirement figure of 2960/148 dwellings per annum (dpa) justified having regard to the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA) (LP2/01)?

- 2.1 The Submission Plan sets out a plan period from 2011-2031. Based on the HEDNA report, the requirement for this period is 2,960 dwellings. The HEDNA also provides a housing figure for the period 2011-2036. For Oadby and Wigston this figure is 3,875 dwellings at an annual rate of 155 dwellings per annum.
- 2.2 It is noted that Melton Borough Council's submission plan period extends to 2036.
- 2.3 In the Joint Statement of Cooperation (LP2/04), Oadby and Wigston advised that there was likely to be unmet need for the extended period to 2036 which would require further discussion and agreement with other HMA authorities. Paragraph 4.2.11 of the Submission Draft Plan refers to some additional 400 dwellings that could be provided up to the end of the plan period to 2031 or beyond, including approximately 300 new homes as part of a Phase 3 of the Wigston Direction for Growth.
- 2.4 There is the potential to provide at least a further 300 homes in the Wigston Direction for Growth. The Council's approach of using this potential additional provision to provide some flexibility over the period to 2031 is considered to be the logical approach in this case. Given Oadby and Wigston's relationship with Leicester City, and the likely issues of unmet need beyond 2031, keeping the plan period to 2031 is considered appropriate.

Q3. Have all reasonable alternatives been considered to address the provision of sufficient affordable housing?

- 2.5 The HEDNA considers affordable housing need for each local authority area over the period 2011-2036. For Oadby and Wigston a net affordable need of some 139 dwellings per annum is identified.

- 2.6 Given the identified level of affordable need for Oadby and Wigston, the HEDNA report concludes that a 20% adjustment to the demographically driven OAN is justified with the aim of boosting affordable housing delivery. This approach is considered to be justified and will help ensure that the opportunities for affordable housing provision in the Borough are maximised over the plan period.

Q4. Table 1 of the Joint Statement of Co-operation Relating to Objectively Assessed Need (OAN) for Housing November 2017 (LP2/04) brings together the OAN as defined in the Housing and Economic Development Needs Assessment (HEDNA) for each authority area and the theoretical capacity relating to that area. For Oadby and Wigston, the OAN and the theoretical capacity are the same. Is the LP therefore sufficiently flexible to ensure delivery of sufficient housing to meet the OAN/housing requirement over the plan period?

- 2.7 As referred to above, paragraph 4.2.11 of the Submission Draft Plan indicates that an additional 400 homes could be provided to give sufficient flexibility to ensure that the identified housing needs for the Borough are met. Part of this additional provision could come forward as part of a Phase 3 of the Wigston Direction for Growth, ensuring that there is a degree of flexibility built in to the plan.

Q5. Is the principle of identifying 'direction for growth areas' sound?

- 2.8 Policy 2 of the Submission Draft Plan indicates that Direction for Growth Areas in combination will deliver at least 1,159 dwellings over the plan period. The approach to Directions for Growth is explained at paras 4.2.30-4.3.40 of the plan. The Proposals Map shows specific allocated areas for the proposed Directions for Growth.
- 2.9 Policies 18, 20 and 21 provide further detailed requirements in relation to the three Proposed Directions for Growth. The original Direction for Growth was included in the Core Strategy and the Key Diagram identified a broad location for the identified area.
- 2.10 With the new Local Plan being a single local plan, it is logical to identify allocated areas on the Local Plan.

2.11 Whilst this is not considered to be an issue of soundness, it may be more appropriate to refer to the sites as sustainable urban extensions.

Issue 2: Whether the Council will be able to demonstrate a five year housing land supply on adoption of the LP.

Q1. When calculating the five year housing land supply, is it appropriate in the context of Oadby and Wigston to (a) apply a 5% buffer and (b) only apply the buffer to the LP base requirement and not any shortfall (as set out in the Council's response to the Inspector's Initial Questions to the Council (Q7))?

Q2. Is the Council's preferred approach of meeting the existing shortfall over the remaining plan period (the Liverpool approach) rather than over 5 years (the Sedgefield approach) justified?

Q3. Does the LP clearly express how 5 year housing land supply will be calculated?

2.12 The Council's approach to the calculation of five year land supply is set out in document C1, Response to Inspector's Initial Questions.

2.13 The Council indicate its approach is to apply the Liverpool method to dealing with any shortfall and to only apply the buffer to the Local Plan base requirement. This is not appropriate and the Sedgefield approach, which applies the shortfall to the first five years should be applied. The Planning Practice Guidance is clear that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible (PPG reference ID: 3-035-20140306).

2.14 Inspectors in a number of appeal decisions have confirmed that the Sedgefield approach should be used in dealing with identified shortfalls. In an appeal decision at Three Pots, Burbage, the Inspector concluded on the application of the Liverpool or Sedgefield method as follows:

"12. The same approach governs the adoption of the Sedgefield approach rather than Liverpool. After all, in the case of this authority, the backlog of houses includes those that should have been built up to seven years ago. To spread that backlog out over the next 13 years is to build in even more delays and to sanction consistent under-provision. That is why the Sedgefield approach has generally been considered by Inspectors to be the

correct approach, as any accumulated backlog would be dealt with in the next 5 years.

13. In my view therefore the Sedgefield approach is the most appropriate and if the figures show there has been persistent under-delivery, regardless of economic factors or willingness of the Council to grant planning permissions for housing, then a 20% buffer should be applied."

Three Pots Burbage, Leicestershire (APP/K2420/A/13/2202261

- 2.15 In an appeal at Warfield, Berkshire, the Inspector considered the use of the Sedgefield approach and concluded.

"39. In scenario 3, the Sedgefield method is used to address the shortfall over a 5 year period but that shortfall only includes under-delivery from the current monitoring period and not the shortfall of 359 dwellings from the previous plan period, as required by Policy CS15.....However, that aside, of each of the scenarios presented by the Council, scenario 3 is, to my mind, the most consistent with the guidance within the PPG and the aim of dealing with past under-supply in the next 5 years."

Warfield, Berkshire (APP/R0335/W/14/2228002)

- 2.16 In terms of the application of the shortfall, The Planning Advisory Service, Five Year Supply FAQ also advises as follows:

"We believe the preferred approach is for the buffer to be applied to both the requirement and shortfall. This is the most appropriate order because it ensures the buffer is applied to the full requirement which represents all the need that exists. The idea is that for every year you underprovide the amount adds onto the requirement to be met in the next five years."

PAS, Five Year Supply FAQ, Question 17 (accessed 28/11/17)

- 2.17 It is considered that the Submission Draft Plan could set out more clearly how the five year supply is calculated.

Q4. Is the LP sufficiently flexible to ensure delivery of, and to maintain, a five year housing land supply?

- 2.18 Paragraphs 4.2.11 of the Submission Draft Plan indicate that the Council has identified an additional 'buffer' of some 400 homes against the plan target to address potential delivery issues. This buffer includes some 300 additional homes as Phase 3 of the Wigston Direction for Growth.
- 2.19 It is considered that this approach provides flexibility to help maintain a five year supply. In our representations on the plan we advised that there was scope to provide for an additional 500 homes at the Wigston Direction for Growth that would enable the Council to demonstrate a 20% buffer. We also suggested that the Proposals Map could identify the broad location of Phase 3 for the Direction for Growth.

Q5. Do the housing delivery monitoring indicators contain a timely trigger that will ensure measures are put in place promptly should the LP not be effective in maintaining a five-year housing land supply?

Q6. Does the housing trajectory align with the Infrastructure Delivery Plan (LP6/18)

- 2.20 Chapter 12 of the Submission Draft Plan identifies the key indicators that will be used to monitor the delivery of the Local Plan. Against Spatial Objective 7 (page 140) there is reference to the delivery of 250 + 768 residential units as a target. This seems to relate to commitments and windfall sites shown in Table 1, Page 28. The delivery targets could more usefully relate to the delivery of the Directions for Growth and maintenance of a five year supply of housing.
- 2.21 Appendix 2 to the Infrastructure Delivery Plan (LP6/18) sets out the site specific requirements in relation to Phase 2 of the Wigston Direction for Growth, including a roundabout site access from Welford Road, a new road through the site and off-site transport infrastructure. This infrastructure can be provided in accordance with the housing trajectory set out in Figure 1 to the Submission Draft Plan.