

OADBY AND WIGSTON BOROUGH COUNCIL LOCAL PLAN EXAMINATION

MATTER 2: SPATIAL STRATEGY - HOUSING

ON BEHALF OF: MRS B A WALKER (OADBY GRANGE)

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2. MATTER 2 – SPATIAL STRATEGY - HOUSING

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

2.1 Question 1: Is the LP timeframe of 2011 to 2031 appropriate and justified?

2.1.1 It is noted from LP2/02 that the only Local Plan to go beyond 2031 is Melton which goes to 2036. It seems to be that the Strategic Growth Plan, which is a non-statutory document will provide the context for the preparation of Local Plans in the Leicestershire HMA. In its final form, the Plan will set out an agreed strategy for the period to 2050. It will identify broad locations where development might take place and it is also intended to highlight the infrastructure that will be needed to deliver growth. However, any slippage in the preparation of the Strategic Growth Plan will have implications for all the local authorities, furthermore as it is a non-statutory document the Strategic Growth Plan will not be subject to Examination, so it will be tested at each local plan examination. It would appear that the main reason for the Oadby and Wigston Local Plan not going beyond 2031 is that investment is required in strategic infrastructure. However, it can be seen from the Draft Strategic Growth Plan that the strategy proposes to focus on two primary growth areas: Leicester and the A46 Growth Corridor, it is therefore a clear direction of travel.

2.2 Question 2: 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)?

2.2.1 Pegasus set out in our representations on the Pre-Submission Plan that the overall approach of the HEDNA broadly reflected the approach advocated by the NPPG. However, we did raise a number of detailed points in respect of the assumptions which we felt would benefit from clarification and in some case some assumptions were not supported. We concluded that the OAN of 148 dwellings per annum was not robust and should be increased.

2.3 Question 3: Have all reasonable alternatives been considered to address the provision of sufficient affordable housing?

2.3.1 As referred to in our representations the affordable housing need in Blaby and Oadby and Wigston is particularly significant. LP2/01 Table 40 indicates that an uplift in housing provision of between 35% and 390% would be required to meet the full affordable housing need. Whilst it is widely acknowledged that an uplift of this magnitude would be unreasonable as it would not be deliverable, nevertheless the identified OAN of 148 dwellings per annum provides for only 23% of the 632 dwellings per annum required to meet the affordable housing need in full in Table 40. Paragraph 7.29 of LP2/01 states that the evidence clearly justifies consideration of upward adjustments to boost housing delivery in all of the local authorities of the HMA.

2.3.2 The HEDNA considers what adjustments may be applied to boost the delivery of affordable housing and concludes at paragraph 7.45 that an upward adjustment is warranted relative to the demographic need in all of the authorities in the HMA in order to improve affordability.

2.3.3 It is noted that despite the circumstances set out in paragraph 12.25 of LP2/01 of Oadby and Wigston e.g. that the Borough has seen rental costs above the HMA average, lower quartile housing cost relative to incomes are above average, with rents of 43% of annual earnings – higher than in other parts of the HMA. Levels of overcrowding, concealed and shared households are above the level in other districts in the HMA (apart from Leicester City), although the HEDNA indicates that this could be influenced by the Borough’s demographics and its student population. Nevertheless the affordability adjustment in Table 89 of LP2/01 is one of the lowest in the HMA.

2.3.4 It is considered that the housing requirement for Oadby and Wigston should be in excess of the OAN in order to provide the opportunity for a reasonable proportion of the affordable housing needs to be met.

2.4 Question 4: 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 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?

2.4.1 As referred to in our representations it is considered that there is a lack of flexibility to meet the OAN for Oadby and Wigston. Whilst the Plan refers to a buffer of 400 dwellings at paragraph 4.2.11, these sites are not proposed as allocations and therefore the plan fails to provide any contingency. Furthermore, the Plan fails to address some of the unmet needs arising from Leicester City. It is understood that the programme for the preparation of the Leicester City Plan has been revised; it is now anticipated that the MoU will not be published until the City Council's unmet need is robustly quantified, probably in summer 2018, and that it will accompany the publication of the City's draft plan, in summer 2018.

2.4.2 It is noted that in the meantime, a Joint Position Statement has being produced(March 2018) as evidence to show that the OAN can be met across the HMA for the 2011 – 31 period.

2.4.3 In order to avoid the need for an immediate review of the Local Plan it is considered that the Plan should include sufficient flexibility/contingency now in order to address any issues of unmet need and that appropriate trigger mechanisms should be inserted in all local plans coming forward.

2.5 Question 5: Is the principle of identifying 'direction for growth areas' sound?

2.5.1 It is noted that the directions for growth are part of the strategy and part of the three pronged approach to providing for homes that the Borough needs. Pegasus submitted representations objecting to the failure to consider all reasonable alternatives, that the Sustainability Appraisal has not demonstrated that the proposals in the plan are the most appropriate given the reasonable alternatives as required by the NPPG. Representations have been submitted that the site at Oadby Grange is more suitable than some of the allocated sites e.g. land at Stoughton Grange Direction for Growth (Policy 18) which is currently located within a defined Green Wedge. Paragraph

10.6.5 of the pre-Submission version of the Plan explains how important Green Wedges are to the area, playing an extremely important role in shaping the character of the environment and helping to stimulate leisure and tourism and improving quality of life. This issue is addressed in our response to Matter 6.

- Issue 2: Whether the Council will be able to demonstrate a five year housing land supply on adoption of the LP.**
- 2.1 Question 1: 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) [https://www.oadby-wigston.gov.uk/pages/local_plan_examination])?**
- 2.1.1 The Council's response to the Inspectors questions (ref C.1) is noted. The Council state that its position regarding calculating five year land supply is a 5% buffer and the use of the Liverpool approach to responding to backlog / deficit.
- 2.1.2 It is considered that if the Council can illustrate a five year land supply based on the Sedgefield approach then this is the approach which should be used, being consistent with the NPPG. By allocating more suitable, available and deliverable sites this could be achieved.
- 2.2 Question 2: 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?**
- 2.2.1 This question is a matter for the Council to explain, but we would always note that Sedgefield is the approach to be preferred if it can be achieved.
- 2.3 Question 3: Does the LP clearly express how 5 year housing land supply will be calculated?**
- 2.3.1 Yes this is set out in the Plan.
- 2.4 Question 4: Is the LP sufficiently flexible to ensure delivery of, and to maintain, a five year housing land supply?**
- 2.4.1 It is considered that in the absence of a contingency or trigger mechanisms that the Local Plan is not sufficiently flexible to ensure the delivery of housing and to maintain a five year housing supply.

2.5 Question 5: 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?

2.5.1 Although paragraph 4.2.11 of the Pre-Submission of the Plan explains the principles of the buffer of approximately 400 new homes it does not indicate the trigger for the buffer. Furthermore the 400 new homes are not allocated in the plan and if they were to come forward, they would according to paragraph 4.2.12 be subject to testing, in particular highway and infrastructure capacity. The last sentence states that “this will be plan led and will be considered through a future review of this Plan.” Consequently it does not provide a contingency that can be brought forward to respond effectively to any shortfall.

2.5.2 Chapter 12 sets out the Monitoring Framework and this is intended to set out the key indicators that will be used to monitor the delivery of the local plan and its objectives, however, this does not include any trigger mechanisms alluded to elsewhere.

2.6 Question 6: Does the housing trajectory align with the Infrastructure Delivery Plan (LP6/18)? (also see Matter 12)

2.6.1 Pegasus has no comments on this question.