

**Stantec, on behalf the Co-operative Group**

**Examination into the Leicester City Local Plan**

**Matter 1: Duty to Co-operate and Legal Compliance**

**Issue 1a: Has the Council complied with the Duty to Co-operate (DtC) in preparing the Leicester Local Plan (the Plan)?**

***Q1: Does the Plan give rise to any strategic cross-boundary issues for which there is a Duty to Cooperate (DtC)?***

1. Yes. The Statement of Common Ground for the Leicester and Leicestershire Authorities, in relation to housing and employment land use (Doc. Ref.: SCG/1), demonstrates that it is accepted by all of the Leicestershire authorities that Leicester is unable to meet all of its housing needs.
2. The Co-op welcomes the co-operation across Leicestershire in addressing this unmet need, and considers that this accords with the thrust of national policy. Our Client is concerned that some of the other Leicestershire authorities may have committed to assisting the Council in addressing this unmet need, without fully understanding whether they will be able accommodate the additional houses in reality. This is particularly pertinent for the case of Oadby and Wigston Borough Council (OWBC) which, on the basis of SCG/1, would accommodate an additional 52 dwellings per annum of Leicester's unmet need over the lifetime of the Plan, equating to an additional 832 dwellings for OWBC to deliver in total.
3. Like Leicester, OWBC is also preparing a new Local Plan, albeit it is not as advanced as the emerging Leicester Local Plan. Notwithstanding any changes in housing requirement resulting from the draft National Planning Policy Framework (NPPF) (discussed further below), it is noted that OWBC is a constrained authority, which may well struggle to deliver its own housing requirement, let alone accommodate any additional need from Leicester. OWBC has not yet published details of either the proposed housing requirement for its emerging Local Plan, or details of proposed allocations. Therefore, it is not possible to confirm whether OWBC will be able to meet any of Leicester's unmet need. Given this doubt, it is essential for Leicester to maximise its development opportunities as much as possible to ease the pressure on the surrounding authorities, which may face difficulties in addressing their need.
4. Adding further pressure are the proposed changes to the NPPF, and the updates to the Standard Method therein (as set out at Paragraph 62 and footnote 43 of the draft NPPF, 2024). Notwithstanding the figures quoted in the draft Plan, as well as those in SCG/1, the proposed updates have the potential to significantly alter each authority's ability to accommodate Leicester's unmet need. This impact is demonstrated within the table below:

Leicestershire Local Authorities, Current and Proposed Standard Method Housing Requirements (as per Publication Draft NPPF, 2024)

Authority	Current Requirement (Per Annum)	Proposed Requirement (Per Annum)	Difference (Per Annum)
Blaby District Council	329	559	+230
Charnwood Borough Council	1115	1012	-103
Harborough District Council	510	706	+196
Hinckley and Bosworth Borough Council	432	689	+257
Melton Borough Council	192	370	+178
North West Leicestershire District Council	357	621	+264
Oadby and Wigston Borough Council	198	389	+191

5. Whilst Leicester would see a reduction from 2,345 to 1,690 (a reduction of 655 dwellings per annum), the proposed changes to the NPPF, if enacted as currently proposed, would see a total of 1,213 additional homes per year above that currently planned, that will need to be delivered across neighbouring authorities.
6. This will undoubtedly hinder some of the adjoining authorities' ability to accommodate Leicester's unmet need. That is not to say that the adoption of the Plan should be delayed, but that there will be a need to review the plan early following its adoption in order to assist the adjoining authorities in the preparation of their respective Local Plans.

***Q4: Does the evidence contained in the Statement of Compliance with the DtC and the associated SsoCG adequately demonstrate that the City Council has met the DtC in accommodating unmet needs?***

7. Our comments in relation to the Statement of Common Ground (SCG/1) are in line with the response to Q1 above.
8. In relation to the Statement of Compliance (Doc. Ref: SD/12), the Co-op is content that the contents of the Statement of Compliance demonstrate that the Council has adequately met the requirements of the Duty to Co-operate, but do note that the document dates back to November 2022, and is approaching two years old. Noting the passage of time, as well as the publication of a revised consultation draft of the NPPF (as well as the associated revisions to housing need set out therein), our Client considers it is essential that this document is revised as soon as possible after adoption of the Plan, so that it reflects the changing policy for housing in Leicestershire. As stated previously, if the revised NPPF is brought into force (which is currently expected later this year), then the Leicestershire authorities may need to revise their position from that within SCG/1, which predates these changes (June 2022), because their local plans will need to respond to revised, and in most cases, increased housing needs.
9. Our Client acknowledges that these changes to national planning policy are not yet adopted, and so may be subject to further change. If the Plan is to be sound, the Co-op considers it essential that each Leicestershire authority's position, particularly in relation to its ability to meet some of Leicester's unmet need, is as accurate and up-to-date as possible after adoption of the Plan.