

LEICESTER LOCAL PLAN 2020-2036 EXAMINATION

MAIN MATTER 2 – VISION AND STRATEGY

REPRESENTOR ID: 334

GREYROCK INVESTMENTS LTD
LAND SOUTH OF EVINGTON LANE

SEPTEMBER 2024

rg+p Limited
Sovereign House
17 Princess Road West
Leicester
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1 INTRODUCTION

- 1.1 This hearing statement has been prepared by rg+p in support of representations made on behalf of Greyrock Investments Ltd ('our client'). These relate to the ongoing promotion of land known as 'Land South of Evington Lane' ('the site').
- 1.2 The site is owned by our clients and lies adjacent to The Leicestershire Golf Club, and it is their intention to redevelop the parcel of land to provide circa. 30 residential dwellings in a highly sustainable location, at a time of pressing housing need in the City. This land extends to approximately 0.42 hectares and is currently partially designated as being within the Evington Green Wedge.
- 1.3 The site has been presented to the Council on several occasions including two individual pre-application enquiries. Following these pre-application enquiries, our clients submitted a 'Call for Sites' submission and representations to the Regulation 19 (Pre-Submission Plan Consultation) stage of the merging Local Plan.
- 1.4 Therefore, this statement follows from this previous representation to the plan (Representor ID: 334) and should be read in conjunction with these submissions.
- 1.5 rg+p welcomes the opportunity to appear at the hearing session to expand on the comments included in this statement and we have responded where appropriate to the questions highlighted within examination document EXAM 12. It is our intention to play an active role in the examination hearing sessions and assist the Inspector(s) and Council in forming a sound Local Plan.

2 ISSUE 2: IS THE PLAN'S OVERALL VISION AND STRATEGY POSITIVELY PREPPARED, JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY IN ENABLING THE DEVELIVERY OF SUSTINABLE DEVELOPMENT.

Question 19

- 2.1 **No**, the requirements of paragraph 22 of the framework are clear and, in our view, unambiguous. The strategic direction for plan making in Leicester and Leicestershire is framed by the Strategic Growth Plan (SGP) which covers the period to 2050. Therefore, making provisions for a local plan which covers a period to only 2036 against the backdrop of a longer term vision for the area is not positively prepared, justified or consistent with this important tranche of Government Planning Policy.
- 2.2 Our clients consider that the only appropriate remedy would be to extend the plan period and identify further deliverable housing sites, of which their proposed allocation is such an option. The Council have had ample opportunity to do this following the Regulation 18 consultation, alongside a requisite update of evidence base studies.
- 2.3 It is noted that in the Council's response to question 5 (exam document 3) reference is made to the role of evidence-based studies. Our clients have concerns about the timeliness of the evidence base and whether it provides a robust basis for the formulation of sound policies. This will be further explored through participation in the hearing sessions and is explored in our previously submitted Regulation 19 representations.

Question 20

- 2.4 For the reasons set out above, our clients consider that the plan period should be extended to reflect the requirements of paragraph 22 of the framework. This is given the clear role of the SGP.
- 2.5 Whilst the Council appear to accept that an early review may be necessary to rectify the inadequate plan period, this is of little benefit without a clear understanding of the scope of the early review and confirmation as to precisely which policies will be fully reviewed. The plan should also be based upon robust and up-to-date evidence, our submissions are that it is not and if a review is to be effective it should fully focus on exhausting all available and deliverable land within their administrative boundaries to ensure over the plan period the Housing need requirement is satisfied.

Question 21 and 22

- 2.6 **No**. The level of reliance on assumed 'windfall' delivery within a geographic area (the CDA) is unprecedented.
- 2.7 The Council's published evidence on windfall delivery City wide (2015 to 2022) does not provide sufficient comfort that the required delivery rates within the CDA can be achieved. Furthermore, we cannot find any quantified delivery rates or indication of the conversion of commitments to delivered housing units within more recent monitoring years within the CDA. This is despite the clear engagement of the presumption in favour of sustainable development (the tilted balance) for a considerable period. Therefore, we raise significant concern at this time that such a Windfall Housing reliance can be justified.
- 2.8 We are of the position that the Council should seek alternative provision through Strategic and Non-Strategic allocations to address this identified concern to the delivery of housing. In the absence of allocated identified sites within the CDA it is impossible to judge whether this policy approach is likely to be successful and provide a reliable

basis for decision making and maintaining a supply, even in the event of an immediate review of the plan.