

Inspectors Housden and Baugh-Jones

Southfield Road, Loughborough,
Leicestershire. LE11 2TX

30 June 2022

Dear Inspector Housden and Inspector Baugh-Jones

Further Statement on Meeting Leicester City's Unmet Housing and Employment Needs – process and timetable for reconvening the examination hearings

1. The Local Plan examination hearings considered the matter of Leicester City's unmet housing and employment needs as part of a wider discussion on the 'duty to co-operate' on 28 June 2022. During that discussion the Council offered from the outset a positive and proactive approach to the issue. It had been hoped that this approach would have been positively received. At the request of the Inspectors, the Council prepared and published a statement on this matter on 28 June 2022 (EXAM/39).
2. Upon further consideration the Inspectors have asked that the Council work with them to identify a process and timeline on the matter of apportionment of the unmet housing and employment needs and its supporting evidence. Whilst the Council is disappointed that the Inspectors feel that it is not possible to consider this matter in the way suggested, it nevertheless agrees to take a positive approach in navigating a way forward in a timely manner. We very much welcome the Inspectors' offer to work proactively and collaboratively with us to find a shared solution.
3. Contrary to what the Council feels to be the somewhat extreme and/or perhaps somewhat self-serving views vocally expressed by a minority of participants on 29 June 2022, the Council believes that the process required to resolve this matter can be expedited whilst according with all relevant legal requirements and policy guidelines. The Inspectors also indicated that their view was that this matter could be accommodated within the hearings, but that different questions would need to be raised and addressed to enable a fully participative and transparent process.



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4. This would involve a recast of the questions from the Inspectors on the relevant matters to all participants and inviting (further) representations on the already published HENA, its associated Sustainability Appraisal, housing and employment distribution papers, and the revised statement of common ground. (Separately it may also be prudent at this time to invite additional comments on other updated documents including the viability addendum (which considers transport investments)). In addition, the Council may be asked to respond further on housing supply matters in light of the proposal to reflect the Charnwood apportionment of Leicester City's unmet need. The Council has already indicated its preparedness to do so in EXAM/39.
5. The milestones required to progress this would be
 - Notice of hearing dates
 - Six-week period inviting representations on HENA and distribution of unmet need documentation
 - Publication of hearing agenda/questions
 - Hearings resume
6. To this end, the Council proposes that consultation could take place over the course of Summer 2022 for six weeks, that period commencing within a few days of this statement. The hearing sessions could then reconvene during late September/ October 2022. The Council considers that this provides a positive response to this matter that will benefit the wider public interest.
7. As stated above, the Council has considered the possibility of significantly longer "pauses" (up to 12 months) to the examination proposed by a small number of participants. The Council considers that a delay of such length is unnecessary and therefore unreasonable and that this would have a profoundly negative impact upon place-making and decision-taking across Charnwood. It would facilitate the unplanned patterns of development and infrastructure investment that the new Local Plan specifically seeks to address. It also has the potential to harm the reputation of the planning system by damaging the confidence that our residents, communities, and partners have in this plan-making process.
8. Should, however, the Inspectors determine that they feel unable to accommodate the issues of unmet need within the suggested (or similar) timescale set out above, then the Council is likely to request that the examination reverts to the Council's original and expressly reserved position – namely the submitted version of the new Local Plan and the trigger mechanism therein for the review of the Local Plan set out in draft Policy DS2. The Council considers that this option would provide a mechanism for securing a sound and defensible local plan as soon as possible. If it is considered appropriate for the examination of the emerging Leicester City Plan formally to establish both Leicester City's unmet need and the apportionment thereof (a process which may take 2 years – i.e. until July 2024), the Council would consider a suitable modification of draft Policy DS2 to allow for the establishment of that need and apportionment to act as the trigger point for a review of this Council's Local Plan. The Council would at the same time seek to demonstrate through the current examination that it can provide a sufficient buffer of supply for the interim period (i.e. the 2 year period referred to above and the additional 2-3 years it may take for any revisions to the Local Plan to be brought forward and adopted).

9. Whilst the immediately foregoing is not currently the Council's preferred approach to this issue it would secure the plan-making framework that the Borough needs and the Government encourages at an early opportunity.
10. The Council would of course be grateful to receive the Inspectors' views before it takes a final decision as to how it wishes to proceed.

Yours sincerely



Richard Bennett
Head of Planning & Regeneration