Bill Cullen MBA (ISM), BA(Hons) MRTPI *Chief Executive*

Please ask for: Daisy Shields Phone: 01455 255732

Email: planningpolicy@hinckley-bosworth.gov.uk

Our ref: 0200/0206/OadbyWigston

Date: 15 October, 2021

FAO Mr Jamie Carr

Planning Policy Manager, Oadby and Wigston Borough Council

By email only: planningpolicy@oadby-wigston.gov.uk

Dear Mr Carr,

<u>Planning Policy Public Consultation: The Borough of Oadby and Wigston New Local Plan – Issues and Options.</u>

Hinckley & Bosworth

Borough Council

Thank you for consulting Hinckley and Bosworth Borough Council (HBBC) on the Oadby and Wigston Borough Council (OWBC) Local Plan Issues and Options document. It is noted that the Plan is at an early stage of development and a preferred options document will be consulted on from May to June 2022, following this consultation. We look forward to continuing a positive and productive dialogue between our two authorities and the wider Housing Market Area (HMA) to help progress our plans. Please find below HBBC's response to the Issues and Options document, which addresses key parts which are most relevant to Hinckley & Bosworth borough.

Duty to cooperate: part 02

HBBC consider that OWBC have engaged constructively, actively, and on an ongoing basis with partners including neighbouring authorities, the County Council, the LLEP (Leicester and Leicestershire Enterprise Partnership), and other relevant bodies. The Strategic Growth Plan is a testament to the joint commitment across Leicester and Leicestershire to plan for long term growth through an agreed, proactive, and collaborative approach.

All ten partners are signatories to a Joint Position Statement relating to Leicester's housing and employment land needs, published in September 2020. This sets out how authorities will continue to work together to accommodate a potential unmet need for housing and employment land identified in the draft Leicester Local Plan. In December 2020, the standard methodology for calculating housing need was revised and this led to a significant increase in housing need for the city of Leicester (35% uplift). The housing need for the other authorities in Leicestershire remained unchanged. As a result of this significant increase in the housing figure for the City, further additional work is required across the Leicester and Leicestershire Housing Market Area to inform the apportionment of unmet need arising from Leicester.

HBBC support the approach set out in part 02, paragraph 4.8, of the document, which states that OWBC will engage with all Leicester and Leicestershire local authorities and produce a number of Statements of Common Ground. A Leicester and Leicestershire Housing Market Area Statement of Common Ground(s) is seen as the most effective method to address strategic cross-boundary housing and employment issues, such as dealing with Leicester City's declared unmet need. A joint Statement is currently being prepared and will be submitted to each local authority within Leicester and Leicestershire for agreement.

Housing Need and growth: Parts 02 and 03

It is recognised that the local plan for Oadby and Wigston is at an early stage of development and that this consultation document sets out various options for the scale and location of growth in the borough.

It is recognised that the borough has particular challenges related to its compact and highly urbanised nature. This impacts both the scale and form of future growth in the borough.

In terms of housing growth, HBBC would support an approach based on using the Standard Method for calculating housing need as a starting point for establishing a housing requirement for the borough. The Housing and Employment Needs Assessment (HENA) jointly being prepared by the Leicester and Leicestershire authorities will form part of the evidence base for the local plan (and for all the local plans across the Housing Market Area) and should be a consideration when assessing the housing requirement for the borough to move on from the Standard Method housing need start point.

With regard to Leicester City's unmet need, this will be a joint duty of cooperation matter for determination between the Leicestershire authorities through the Statement of Common Ground process, as discussed above. It is recognised that the borough's characteristics – in particular its compact size, urbanised nature, and limited greenfield options - will be considerations in the amount of housing the borough could sustainably accommodate during the plan period.

Housing Density: Part 03

The potential options given are to (1) roll forward the current minimum densities (50dph, 40dph or 30dph depending on location), (2) decrease or increase the densities, and (3) have a single target across the borough area.

In the context of evidence indicating an increasing housing need for the borough, HBBC would be concerned if decreases in density requirements were proposed because this would effectively increase the quantity of land needed to meet the housing need/requirement, and consequently make the task of meeting the housing requirement more challenging.

Employment Need: Part 04

HBBC supports the approach to assessing employment needs through the joint HENA study. The study will provide a consistent approach to employment needs across the Leicester and Leicestershire area.

Green Infrastructure: Part 06

HBBC are supportive of the net gain in green infrastructure approach and recognise the need to review the policy to ensure that it is up-to-date with national policy. Have OWBC considered looking at incorporating Building with Nature Standards into the Green Infrastructure Policy? Building with Nature is a framework of Standards for good green infrastructure. It brings together existing guidance and good practice to recognise high-quality green infrastructure at all stages of the development process including policy, planning, design, delivery, and long-term management and maintenance.

Green Wedges: Part 06

Since Green Wedge policies were introduced in the Leicestershire Structure Plan in 1987, they have remained an important policy tool guiding development across the HMA. HBBC support a strong approach to Green Wedges as a policy tool to prevent the merging of settlements, to guide development form, to provide a green lung into urban areas and to provide a recreational resource. HBBC support the retention of green wedges as a policy tool, although highlight the need to have an up-to-date evidence base which may result in the need for an updated Green Wedge Review to inform the Local Plan.

Habitats and Biodiversity: Part 07

HBBC support the use of Natural England's Biodiversity Metric 3.0. The Biodiversity Metric 3.0 can be used to measure gains and losses to biodiversity resulting from development. The metric has been tested and will ensure consistency across the plan area.

Climate Change: Part 07

Spatial planning is a key tool in aiding local authority's ability to deliver net zero. Local Planning Authorities in England are bound by a legal duty to ensure that planning policy contributes to the mitigation and adaptation of climate change alongside sustainable development. The climate change agenda should be integrated and embedded into the Local Plan. OWBC should ensure that a place-based approach is taken to deliver the climate change agenda ensuring that local conditions and priorities are met.

We look forward to continuing our working relationship with Oadby and Wigston Borough Council in the development of our respective local plans and on wider cross-boundary issues.

Yours sincerely,

Daisy Shields

Planning Officer, Policy

Development Services

Hinckley and Bosworth Borough Council