

# Harborough District Council

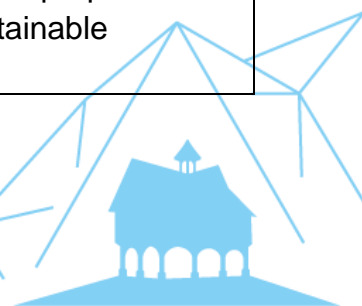
## Report to Cabinet Meeting of 4 September 2023



<b>Title:</b>	<b>Leicester and Leicestershire Statement of Common Ground relating to housing and employment land needs</b>
<b>Status:</b>	<b>Public</b>
<b>Key Decision:</b>	<b>N/A</b>
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<b>Portfolio Holder:</b>	<b>Cllr Knowles, Strategic Planning Portfolio Cllr Galton, Planning Portfolio Holder</b>
<b>Appendices:</b>	<b>A: Leicester and Leicestershire Statement of Common Ground relating to housing and employment needs, June 2022 B: Leicester and Leicestershire Housing and Economic Needs Assessment, June 2022 C: Leicester and Leicestershire Housing and Economic Needs Assessment: Executive Summary, June 2022 D: Leicester and Leicestershire Housing and Economic Needs Assessment: Housing Distribution Paper, June 2022 E: Leicester and Leicestershire Housing and Economic Needs Assessment: Employment Distribution Paper, June 2022 F: Leicester and Leicestershire Statement of Common Ground: Sustainability Appraisal Report, June 2022 G: Leicester and Leicestershire Statement of Common Ground: Sustainability Appraisal: Non-Technical Summary, June 2022 H: Leicester and Leicestershire Statement of Common Ground relating to housing and employment needs FAQs, June 2022 I: Communities Scrutiny Panel Minutes: 13<sup>th</sup> October 2022</b>

### Executive Summary

- i. This report proposes that the Council signs the Statement of Common Ground (“SoCG”) with the other planning authorities in Leicestershire.
- ii. The Duty to Cooperate (“the Duty”), introduced by the Localism Act 2011, imposes on the Council a duty to work collaboratively with partner authorities on strategic cross boundary issues. This includes ongoing constructive engagement on the preparation of development plan documents and other activities in relation to the sustainable development and use of land.



- iii. Signing the Statement of Common Ground will support the Council in meeting its Duty to Cooperate and Tests of Soundness, both of which are essential in order to adopt its new Local Plan.

## **Recommendations**

- a. **That the Council become a signatory to the Leicester and Leicestershire Statement of Common Ground relating to housing and employment needs, June 2022.**

## **Reasons for Recommendations**

The Statement of Common Ground is fair and reasonable for Harborough District and has previously been signed by 7 of the 9 authorities in Leicester and Leicestershire.

The evidence underpinning the Statement of Common Ground is clear and transparent and considered robust.

Agreeing to the Leicester and Leicestershire Statement of Common Ground will demonstrate ongoing constructive engagement with partner authorities across Leicester and Leicestershire. It will provide evidence of the Council's fulfilment of its statutory Duty to Cooperate and meeting the Tests of Soundness; both of which are a statutory requirement in order to adopt the next Local Plan.

Not signing the Statement of Common Ground would place the Council at risk of being unable to adopt the next Local Plan. This would be harmful to Harborough District.

Whilst the Government has indicated that future planning reforms will repeal the Duty to Cooperate, this is not expected to come into force until September 2024 at the earliest. The Duty to Cooperate remains a legal requirement for the foreseeable future and must be complied with.

Signing the Statement of Common Ground will provide greater certainty as to the housing and employment requirements of the district to inform the next Local Plan.

Leicester City Council's evidence on their housing land capacity is considered robust and would need to change substantially to have any significant impact.

Working collaboratively with partner authorities across Leicester and Leicestershire maintains positive relationships with neighbouring and other partner authorities, assisting in the preparation of the Local Plan, for example through joint working on evidence preparation.

## **Purpose of Report**

1. To recommend that the Council becomes a signatory to the Leicester and Leicestershire Statement of Common Ground relating to housing and employment needs.

# Background

## Local plans

2. The development plan is at the heart of the planning system with a requirement in law that planning decisions must be taken in line with it, other than in exceptional circumstances. As such it is essential that plans are in place and kept up to date.
3. To this end, the Harborough Local Plan was prepared and subsequently adopted in April 2019. It replaced the previous Harborough District Core Strategy adopted in 2011. Regular reviews and updates of local plans are essential to ensure policies remain up to date. As such, whilst the current local plan remains up to date, a new local plan is being prepared to provide long term certainty, allocate development in sustainable locations and protect important natural spaces and built heritage.
4. Councils must meet certain legislative and policy rules in order to get a local plan in place. This means that the Council must demonstrate that legal requirements have been met, as well as policy tests, known as the Tests of Soundness. These are tested by an independent Inspector during the local plan Examination. This includes testing to ensure that the local plan makes adequate provision, not just for local housing needs, but that it also helps to ensure that any unmet needs from neighbouring areas are also met.

## Duty to Cooperate

5. Local authorities have a duty to work together to address planning issues which extend across local authority boundaries. One such issue is housing needs. This is because the need for homes is not limited or defined by local authority boundaries. Whilst need may arise in one local authority area, in reality people will often move to another area in search of a new home as their family grows or their personal circumstances change.
6. Whilst in the past these cross boundary (or 'strategic') issues were dealt with through dedicated strategic planning documents (structure plans, then more latterly regional plans, such as the East Midlands Regional Plan), since 2011, this has been dealt with by local authorities through the Duty to Cooperate ('the Duty'). This is a legal requirement on local authorities to work together to ensure strategic issues are tackled within local plans. The Duty requires ongoing constructive engagement on the preparation of development plan documents and other activities in relation to the sustainable development and use of land.
7. Statements of Common Ground are prepared in order to demonstrate that the Duty to Cooperate has been met and to record the outcome of collaboration. The statement can be used as evidence of the effective ongoing collaboration and engagement between partner authorities required in order to pass the Duty to Cooperate. A SoCG is a written record of the progress made by strategic plan-making authorities during the process of planning for strategic cross-boundary matters and:
  - a. documents where effective co-operation is and is not happening through the plan-making process;
  - b. demonstrates at plan examination in public that plans are deliverable and based on effective joint working across local authority boundaries;
  - c. forms part of the evidence required to demonstrate that councils have complied with the duty to cooperate;
  - d. is a living document.

## Unmet needs

8. Leicester City Council have insufficient land within their administrative area to meet their needs for future homes and jobs. As such, Leicester City Council declared an unmet need in relation to both housing and employment needs. It is not uncommon for cities like Leicester to have unmet needs as they build up to their boundaries and run out of land to develop.

## Statement of Common Ground

9. Partner authorities across Leicestershire have been working together to seek to accommodate this unmet need. Where there is an unmet housing need like the situation in the City, the Duty to Cooperate and Tests of Soundness require neighbouring authorities to demonstrate to an independent Inspector that:
  - The authority has engaged constructively, actively and on an ongoing basis in relation to the unmet need;
  - That the new plan is informed by agreements (such as the Statement of Common Ground), so unmet need is accommodated where practical and sustainable to do so; and
  - That the new plan is based on effective joint working on cross-boundary matters (like Leicester's unmet need) that have been dealt with rather than deferred, as evidenced by a statement of common ground.
10. The Leicester and Leicestershire SoCG (Appendix A) is the outcome of collaboration between the Leicester and Leicestershire authorities. It serves to tackle the issue of Leicester's unmet needs and in so doing, can be used by each authority in preparing their next plan as evidence to fulfil their legislative and policy tests.
11. The SoCG sets out the apportionment of Leicester's unmet housing and employment needs in the period to 2036. It has been prepared by the eight local planning authorities responsible for plan making (below) together with Leicestershire County Council:
  - Blaby District Council;
  - Charnwood Borough Council;
  - Harborough District Council;
  - Hinckley & Bosworth Borough Council;
  - Leicester City Council
  - Melton Borough Council;
  - North West Leicestershire District Council;
  - Oadby & Wigston Borough Council.
12. The SoCG is based upon a suite of evidence documents (Appendices B to G), as follows:
  - Leicester and Leicestershire Housing and Economic Needs Assessment (Appendix B) and Executive Summary (Appendix C),
  - Leicester and Leicestershire Housing and Economic Needs Assessment: Distribution of Leicester's unmet Housing (Appendix D)
  - Leicester and Leicestershire Housing and Economic Needs Assessment: Distribution of Employment Needs (Appendix E)
  - Sustainability Appraisal (Appendix F) and Non-technical summary (Appendix G)
13. The SoCG is now being considered by each of the authorities set out above for approval. At the time of writing, the following local authorities have approved the SoCG:
  - a. Charnwood Borough Council;

- b. Oadby and Wigston Borough Council;
- c. Melton Borough Council;
- d. Blaby District Council;
- e. Leicester City Council;
- f. North West Leicestershire District Council.
- g. Leicestershire County Council

## **Details**

### Need for the Statement of Common Ground

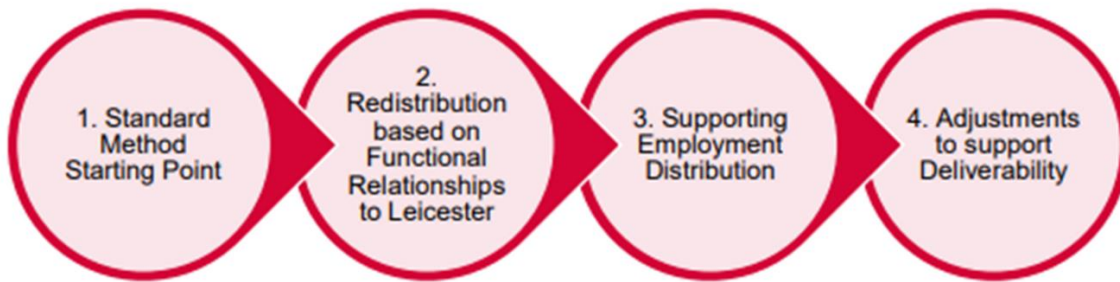
14. In December 2020 the Government published a new method for calculating housing need, which is the starting point for determining how much housing land is to be met through a Council's local plan. The new method required the 20 largest cities and urban centres to add an additional 35% to their local housing need. This applied to Leicester, resulting in their housing need increasing by 35%, adding a further 9,712 homes to their need between 2020 and 2036 (i.e., an additional 607 homes per year).
15. The City's need now stands at 39,424 between 2020 and 2036. Although the City is heavily constrained, their local plan plans for c.21,000 homes to 2036 by:
- Building on Brownfield sites
  - Building at high density (including building-up where they can)
  - Developing greenfield sites.
16. This leaves an unmet need of approximately 18,700 homes and 23 hectares of employment land to be accommodated in the Leicestershire Districts and Boroughs.
17. Evidence associated with Leicester's local plan is considered to be comprehensive and robust. It provides confidence that every effort has been made to ensure their local plan accommodates as much growth as possible. At the time of writing, Leicester City Council is expected to submit their local plan for independent examination shortly. Examinations are a lengthy and very forensic process and will consider in detail both the draft plan itself as well as all the evidence underpinning it. Should the City's unmet need change significantly through their Local Plan Examination, the Statement of Common Ground will simply be updated to reflect this, as set out in the Statement of Common Ground itself.
18. Whatever the outcome of the examination, Harborough District Council retains responsibility under the Duty to Cooperate and through the Tests of Soundness to contribute towards meeting unmet need.
19. Evidence therefore suggests Leicester's unmet need figure is correct and there is no reason to delay or not approve the Statement of Common Ground on this basis.

### Evidence informing the Statement of Common Ground

20. Members will be aware that a previous Leicester and Leicestershire wide Housing and Economic Needs Assessment (referred to as the HEDNA) from 2017 informed the housing and employment land provision of the adopted Local Plan. The new study, the Leicester and Leicestershire Housing and Economic Needs Assessment (HENA) (Appendix B) is the

first comprehensive Leicester and Leicestershire study since then. Appendix C is a useful Executive Summary.

- 21. The HENA also includes two distribution papers, one for housing (Appendix D) and one for employment (Appendix E), which provide an evidence base to the issue of the redistribution of unmet needs from the Leicester City Council administrative area.
- 22. The HENA Housing Distribution Paper (Appendix D) identifies the following steps in assessing the distribution of homes/unmet housing need across Leicester and Leicestershire:



- 23. Each of these steps is considered below along with commentary as to what this means for Harborough District.
  - A. The approach treats the government’s standard method for calculating local housing need for each of the Leicestershire Districts/Boroughs as a minimum level of provision (in line with the NPPF).

The standard method results in a local housing need figure for Harborough of 534 dwellings per annum (2022 based). N.B. this figure is subject to change due to updates to data used within the standard method calculation.

- B. The next step is to consider the functional relationship of each District/Borough with the City, taking account of migration and commuting relationships between the authorities. This generates an initial distribution of unmet need.

- C. For Harborough, this sees an upwards adjustment of 123 dwellings per annum reflecting the fact that Harborough shares a boundary and has a relatively strong relationship as evidenced through commuting and migrating flows both in and out of the city. This is around the mid-range in terms of scale increase due to the functional relationship with the city.

Adjustments are then made to this distribution to align with the spatial distribution of future employment growth over the period to 2036, to promote a balance in the delivery of jobs and homes at a local level and limit the need to travel. This seeks to locate houses close to where job opportunities arise to provide additional labour where it is needed.

This results in no further change for Harborough since the additional minor increase is covered by Step B.

- D. The final consideration relates to the deliverability of the distribution of development.

No change for Harborough.

24. This results in a distribution of unmet housing need across Leicestershire in Table 1 as follows:

**Table 1: Distribution of Unmet Local Housing Need 2020 to 2036**

<b>Local Planning Authority</b>	<b>Average Annual unmet housing need contribution 2020 to 2036 (dwellings)*</b>
Blaby District Council	346
Charnwood Borough Council	78
<b>Harborough District Council</b>	<b>123</b>
Hinckley and Bosworth Borough Council	187
Melton Borough Council	69
North-West Leicestershire District Council	314
Oadby and Wigston Borough Council	52
Total	1,169

25. The distribution of unmet housing need set out in the Statement of Common Ground is based upon a robust and transparent methodology. The outcome is considered to be fair and reasonable for Harborough District.

26. In terms of employment, the paper concludes that Charnwood is best able to suitably meet Leicester’s unmet need of 23 Hectares to 2036. This reflects the existing over-supply of employment land compared to the Borough’s own needs; combined with the availability of sites close to the city which can service the needs of Leicester-based companies to 2036.

### **Implications for Harborough**

27. Government policy (as set out in the National Planning Policy Framework) requires local planning authorities to meet their own local housing need and in addition any needs that cannot be met within neighbouring areas. These two figures added together give the housing requirement, which is the amount of housing planned for through the local plan.

28. Harborough’s local housing need is 534 dwellings per annum (2022 figure). This is calculated using the Government’s standard method for calculating local housing need. The addition of 123 dwellings as Harborough’s contribution to meeting unmet housing need results in a total housing requirement for Harborough of 657 dwellings per annum.

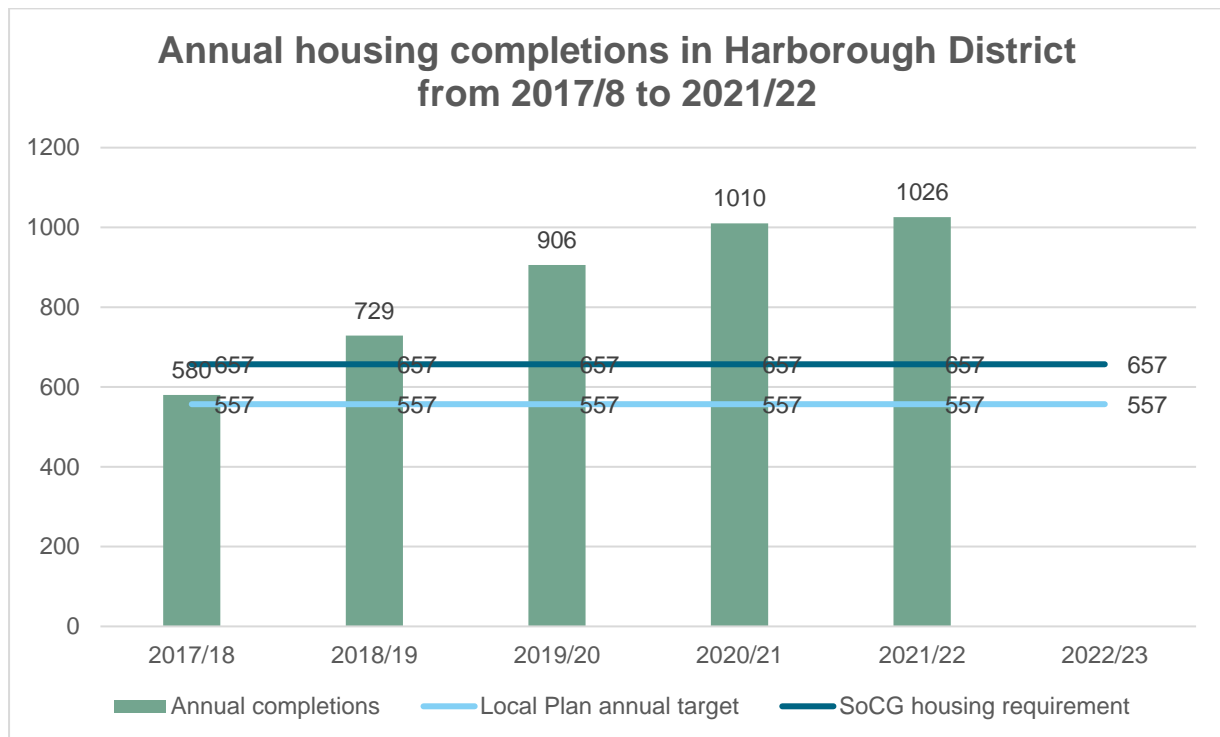
29. The following table, Table 2, sets out the local housing need for each local planning authority (Column B), together with the proposed housing provision for each authority (Column D). The difference (Column E) shows each authority’s contribution to meeting the unmet need.

**Table 2: Leicester and Leicestershire Local Housing Need and Proposed Redistribution (Per Year)**

A	B	C	D	E
Authority	Local Housing Need (2022 figures)	Unmet need	Proposed redistributed Housing Provision	Difference (D - B)
Leicester	2,464	1,169	1,295	0
Blaby	341		687	346
Charnwood	1,111		1,189	78
<b>Harborough</b>	<b>534</b>		<b>657</b>	<b>123</b>
Hinckley and Bosworth	472		659	187
Melton	231		300	69
NW Leicestershire	372		686	314
Oadby and Wigston	188		240	52
L&L Total	5,713		5,713	1,169

30. This results in a total housing requirement for Harborough of 657 dwellings per year (up to 2036) to be planned for in the next Local Plan. The current Local Plan makes provision for a total of 557 homes per year. Housing need is now slightly lower than when the Local Plan was prepared, so taking account of the Statement of Common Ground, this means planning for 100 more than our current plan. The overwhelming majority of that is therefore Harborough's own need. Significantly higher numbers of dwellings have been delivered in the district in 4 of the previous 5 years (over 700 in 2018/19, over 900 in 2019/20 and over 1,000 dwellings in both 2020/21 and 2021/22), compared to the new housing requirement of 657 dwellings, as shown below.





31. Approving the Statement of Common Ground means committing to test delivery of an additional 123 dwellings per year through the next local plan. This involves gathering evidence to inform a consideration of whether this scale of housing growth can be delivered within the District. This will examine issues including;
  - a. site availability and sustainability;
  - b. infrastructure capacity and the ability of development to fund necessary infrastructure improvements;
  - c. the ability of the market to deliver and absorb housing growth.
32. The identification of sites to meet this requirement will be considered through preparation of the local plan. The recently published Strategic Housing and Economic Land Availability Assessment indicates there is sufficient suitable, available and achievable potential housing land to meet this requirement. The Statement of Common Ground explains that the apportionment is subject to review. In the event that an authority's local plan process demonstrates that it cannot meet the figures set out in the Statement, then the distribution of unmet need will be jointly reviewed and updated as necessary.
33. The Council is required to demonstrate as part of preparing the local plan that it has complied with the Duty to Cooperate. If this Council decided not to support the outcome from the Statement of Common Ground, then this would represent a significant risk to the next local plan. This is because whilst it could demonstrate that it has cooperated on preparing the Statement, it would also be necessary to demonstrate as to why it was not appropriate to agree the Statement itself. For the reasons outlined above it is considered that the process and methodology followed is robust.

### **Government's proposed planning reforms**

34. In May 2022 the Government published the Levelling up and Regeneration Bill (LURB), setting out its proposed planning reforms. This Bill is currently passing through Parliament and is expected to receive Royal Assent in September. It proposes a number of reforms to the planning system, including repealing the legal requirements of the Duty to Cooperate.

However, no details have yet been published in relation to the replacement policy test of 'alignment' between local authorities. Whatever the mechanism for dealing with unmet need though, the issue of large tightly constrained urban authorities being physically unable to accommodate their future needs will remain.

35. Recent Government consultations concerning the implementation of the LURB confirm that its proposals are not expected to be brought into effect until at least Autumn 2024. As such, the Duty to Cooperate will remain in force until then and will continue to apply to plans being prepared under the current planning system.
36. In any event, recent Government consultation on changes to the National Planning Policy Framework (December 2022) did not remove the requirement for local plans to plan for their own local housing need and any unmet need arising from neighbouring authorities. A tracked changes version of the National Planning Policy Framework published alongside the Levelling Up and Regeneration Bill consultation retains the need for local plans to provide for "any needs that cannot be met within neighbouring areas, unless . . ." (para 11b). This is reiterated at para 67, para 26 and para 27 referring to statements of common ground to document cross-boundary matters and cooperation to address such issues.
37. Until and unless this requirement is specifically changed or removed, local plans must consider and plan for unmet need from neighbouring areas.
38. There has been recent publicity challenging the need to sign the Statement of Common ground by a local constituency MP. The officer's advice to members remains the same as set out in this report, despite the claims that the duty to cooperate is no longer an issue for the council. A letter to the Secretary of State has been sent asking for clarity on the government's position and once a response is received it will be shared with members. Officers advice remain the same in the meantime, and members are requested to agree to sign the Statement of Common ground to provide the evidence needed to ensure our new local plan is robust enough to pass inspection.

**Recommendations to Cabinet from Communities Scrutiny Panel: 13th October 2022  
(for minutes of the meeting see Appendix I)**

39. The Communities Scrutiny Panel considered the evidence and background to the Statement of Common Ground. The conclusion of the Panel confirmed that the policy background to the Statement of Common Ground is sufficiently clear. As far as the Harborough District is concerned, the Panel was clear that there is unmet housing need in the Housing Market Area, which the district needs to play a role in helping to meet.
40. The Panel recognised the implications of the SoCG and the need to contribute to meeting the unmet need faced by the Leicester and Leicestershire Housing Market Area. The Panel was clear that the risks to the Council of not proceeding to support and sign the SoCG are too great.
41. The Panel recognised the difficulty of the situation for the Council and for partners across Leicester and Leicestershire. However, not supporting and signing the SoCG would potentially put the Council in an isolated and weak position and could risk delivery of a sound new local plan for the district. Therefore, in the light of this the Panel recommend to Cabinet that they recommend to Council that the SoCG should be supported and signed by Harborough District Council.

## **Summary of Consultation and Outcome**

42. Consultation on the scale and distribution of growth will be undertaken in accordance with the Regulations through the preparation of the next Local Plan. This will form an important element of testing the additional housing requirement arising from Leicester's unmet need and set out within the SoCG.
43. In addition to the consideration by Scrutiny Communities Panel on 13<sup>th</sup> October 2022, four separate briefings for Members have taken place between October 2022 and June 2023 involving officers as well as professional experts from across the Leicester and Leicestershire partnership.

## Options

44. As the duty to cooperate remains statutory and Government planning policy is clear on the need accommodate unmet housing needs from neighbouring areas, there are no reasonable alternative positions for the Council to consider other than signing the SoCG. Approving the SoCG will accord with the approach taken by 7 of the 8 partner authorities in Leicester and Leicestershire and will support the preparation of the next local plan.
45. Rejecting the SoCG would put the Council at odds with most partner authorities across Leicester and Leicestershire. Not signing would also place the Council at risk of being unable to demonstrate the Duty to Cooperate and meet the Tests of Soundness, which would prevent the Council from adopting the next Local Plan. This could, in time result in a shortage of suitable housing land, with a less than five-year supply ultimately placing the Council and Harborough District at considerable risk from speculative unplanned housing development, a loss of planning control and risk damage to the high-quality environment Harborough District residents currently enjoy. It is not a recommended course of action.
46. All information required to determine whether to sign the SoCG has now been collected and presented. Accordingly, there is no additional information which can be obtained, and therefore no reason to defer the decision.
47. If Members are minded to approve the SoCG with caveats, Members will be expected to provide robust evidential justification for the rationale of the same. The SoCG has already been approved by most other authorities. Adding in further wording would require that process to be repeated in those authorities, creating risk to the good will of the partnership.

## Implications of Decisions

### Corporate Priorities

48. Approving the SoCG will support the preparation of the new local plan by providing evidence of the Council's compliance with the Duty to Cooperate and will provide certainty over the district's housing and employment requirement to 2036. It will contribute particularly to the "Place and Community" and "Economy" corporate priorities by delivering necessary housing and economic opportunities for the district.

### Financial

49. No financial implications directly arising. However, not signing the Statement of Common Ground could result in significant indirect costs for the Council by significantly undermining the Council's ability to demonstrate compliance with the Duty to Cooperate and meet the Tests of Soundness. This raises the potential for significant abortive costs being incurred should a local plan be prepared and then unable to be adopted due to a Duty to Cooperate or Tests of Soundness failure.

50. In such an instance, the Council could be required to restart preparation of the local plan, incurring very significant costs. It is difficult to estimate with a high degree of certainty, as much depends on how much work is required to be repeated, but it is likely to be in the region of £500,000 to £1,000,000.
51. Not signing would also significantly undermine collaborative partnership working with other local authorities across Leicester and Leicestershire. This is likely to make joint evidence collection more difficult, removing the financial benefits of joint working through economies of scale, as well as the planning benefits of planning over a wider cross boundary area.

### Legal

52. Approving the Statement of Common Ground provides evidence of the Council's ongoing constructive engagement with partner authorities across Leicester and Leicestershire in respect of Leicester's unmet housing and employment needs, as required by the Duty to Cooperate. It provides evidence of the Council fulfilling the requirements imposed by the Localism Act 2022 and prevents the Council from operating ultra vires and therefore at greater risk of successful legal challenge.
53. Failing to approve the SoCG will cause substantial disruption to the Council's aspirations for the district as it could hinder the adoption of the Council's local plan and tarnish the Council's reputation with its neighbouring authorities.

### Policy

54. Approving the SoCG commits the Council to testing an additional 123 dwellings per annum 2020 to 2036 through the next Local Plan. This is in addition to the district's local housing need, calculated through the Government's standard method calculation, which currently results in a figure of 534 dwellings per annum, creating a total housing requirement of 657 dwellings per annum. This compares to the housing requirement in the current Local Plan (2011-2031) of 557 dwellings per annum.

### Environmental Implications including contributions to achieving a net zero carbon Council by 2030

55. A Sustainability Appraisal has been undertaken in relation to the distribution of Leicester's unmet housing and employment needs (Appendix F and Non-technical summary at Appendix G). Sustainability Appraisal (SA) is a process for helping to ensure that plans, policies, and programmes achieve an appropriate balance between environmental, economic and social objectives. The process that is followed incorporates the requirements of a Strategic Environmental Assessment (SEA).
56. The SA concluded that a distribution of housing and employment needs based on the recommendations of the HENA (and the associated housing and employment distribution papers) would be appropriate. Further assessment will be required alongside Local Plan preparation to test the effects of the scale and distribution of growth on environmental, economic and social objectives.

### Risk Management

57. Approval of the Statement of Common Ground will place the Council in a significantly stronger position to demonstrate compliance with the Duty to Cooperate and Tests of Soundness through the Examination of the next Local Plan.
58. Not signing the SoCG would result in the following significant risks to the Council:
  - Potential inability to demonstrate the Duty to Cooperate has been met. This would result in a failure of the legal test and would prevent the next Local Plan being adopted.

- Potential failure of the Tests of Soundness, resulting in the need to amend or re-do significant portions of the preparation of the next local plan, or potentially an inability to adopt the next local plan.
- Significant financial costs in needing to redo abortive work to prepare a new local plan
- The delay in having an up-to-date local plan in place could affect the Council's ability to demonstrate a five year supply of housing land, as currently required by Government policy. This could eventually result in a lack of five year supply, in which case the presumption in favour of sustainable development would apply and the Council could find itself unable to resist speculative housing planning applications. This is likely to result in housing developments in areas of the District not considered the most appropriate locations for housing growth.
- Potential reputational damage and loss of support amongst partner authorities across Leicester and Leicestershire

### Equalities Impact

59. An Equalities Impact Assessment will be undertaken in conjunction with the preparation of the next Local Plan.

### Data Protection

60. No issues directly arising given the lack of personal data within this report.

## **Background papers**

Report to The Communities Scrutiny Panel 13 October 2022: Leicester and Leicestershire Statement of Common Ground (SoCG) Relating to Housing and Employment Needs (2022).