

APPENDIX C

Risk Assessment

Risk	Specific issue	Response
Joint working	The revised NPPF makes it very clear that government wants LPAs to work together, specifically preparing joint statutory Local Plans.	<p>The SGP is clear evidence of joint working albeit on a non-statutory basis. The work has made steady progress over the last three years with no interruption, signs of hesitation or withdrawal of support. Failure to agree at this late stage would signal a major break-up in the partnership putting at risk all of the attendant benefits which could be delivered through continued joint working (notably access to funding and the ability to resist unwanted development pressures).</p> <p>Joint working has also raised the profile of the Leicester & Leicestershire partners with statutory agencies and has contributed to a positive outcome on a number of funding applications.</p>
The 'Duty to Co-operate'	The revised NPPF strengthens the requirements of the 'Duty to Co-operate', effectively turning it into a 'Duty to Agree'.	If approved by all partners, the SPG will be a clear statement of co-operation and agreement. It highlights the issues, identifies a strategy and, in its final form, will be a clear statement of agreement by the partners. This is a powerful statement and a good collaborative position for the partners which can be clearly demonstrated.
Statement of Common Ground	The revised NPPF establishes a mandatory requirement for a Statement of Common Ground and sets out a timetable for its preparation.	The SGP provides much of the information needed for a Statement of Common Ground. The Statement of Common Ground will set out the agreement on housing numbers including a recognition on behalf of the partners that they will need to accommodate any demonstrated unmet need arising from Leicester City (and Oadby & Wigston Borough if necessary).
Reputational damage if one or more partners	Clear demonstration of failure to work co-operatively, lack of strategy	Withdrawal of support by a number of partners would signal clear failure in attempts at joint working. This would

does not approve the Plan	to address acknowledged development requirements and no framework for Local Plan. Consequential, ad hoc and piecemeal development pressures which would be difficult to resist.	be likely to result in a position that would probably be worse than if the SGP process had not started. Intense pressure from development interests would be likely to arise across the Leicester & Leicestershire Housing Market Area (HMA), in all likelihood targeting the types of site that the SGP is attempting to protect (e.g. development in villages and rural areas).
Delay in the preparation of Local Plans	The SGP is intended as a framework for Local Plans. If this does not exist, then the Duty to Co-operate will need to be re-cast in a different form.	Possibility of delay rather than rapid progression towards Statement of Common Ground being agreed across the Leicester & Leicestershire HMA and in the preparation of Local Plans.
Failure to deliver new housing at the pace required.	Local Planning Authorities will have to return to relying on disaggregated and piecemeal ways of securing infrastructure.	Government is committed to the delivery of new housing and accelerating the speed of delivery. Work on the SGP has already supported applications for funding (which have been successful). Homes England have expressed a willingness to support the partners in accelerating growth, bringing other government departments into the process. This is a good collaborative position for the partners to be able to demonstrate as they go forward.
Delivering new infrastructure	<p>Different mechanisms to make the case for arguing for strategic infrastructure would have to be devised. Returning to disaggregated and piecemeal means of doing this might not deliver provision at the scale and pace required.</p> <p>Lack of infrastructure is currently delaying the delivery of some growth that already benefits from planning permission and, as a result, pressure continues to be exerted on other sites.</p>	Government's view is that infrastructure and growth are closely aligned. Those authorities which best demonstrate joint working and a commitment to growth will access the greatest Government funding. Leicester & Leicestershire has had some significant funding successes already e.g. the Melton Mowbray Relief Road; progress to Stage 2 of the Housing and Infrastructure Fund both the South-West Leicestershire package of improvements and the final section of the Melton Mowbray Relief Road.
Accelerating the pace of housing delivery	The SGP demonstrates to Government the effort that has already been made by the partners to	Leicester City Council has secured Marginal Viability Funding to accelerate the pace of delivery at the important Ashton Green site. The

	accommodate development via existing Local Plan allocations and planning permissions. This provides a good platform to negotiate infrastructure funding and other work with Government in order to accelerate delivery.	Leicester & Leicestershire partnership is recognised by Homes England who have offered support in a variety of forms. Accelerating the delivery of consented schemes allows local people to see how growth can support the local housing market and to see the merits of growth.
Loss of confidence in the ability of the partners to plan pro-actively.	Powers exist already for the government to transfer control to the County Council if the partners fail to co-operate and manage growth positively and proactively through a planned approach.	The SGP is an excellent example of collaborative working across organisations with responsibility for the whole range of local government functions. It could be an exemplar of how to balance competing interests and thereby maximise funding opportunities.
The scale of growth will not reduce	There is intense pressure for development in the logistics sector in the Leicestershire and Leicestershire area. Both the Housing and Economic Development Needs Assessment (January 2017) and the new standard methodology for calculating housing needs (set out in the revised NPPF) indicate a similar scale of housing need across the Leicester & Leicestershire housing market area.	The SGP does not promote growth above objectively assessed needs. That being the case, even if the SGP were to be abandoned, Local Plans would have to plan for the same scale of growth but with no over-arching strategy in place. The development industry could target particularly vulnerable authorities e.g. those whose five-year housing land supply is marginal.
Deletion of the A46 Expressway (Southern/Eastern Leicester Bypass	Growth likely to gravitate towards existing infrastructure and major employment centres. Continued pressure also in villages and rural areas across the Leicester & Leicestershire area.	The SGP does no more than accommodate the objectively assessed needs of Leicester & Leicestershire. That being the case, if the new A46 Expressway were to be deleted from the plan, some 38,000 dwellings would have to be provided in other locations. Conventional sustainability criteria are likely to support the notion that new growth should gravitate towards places with infrastructure and economic generators.

Risks specific to Hinckley and Bosworth borough

Risk	Specific issue	Response
Non-endorsement of the Strategic Growth Plan	The revised NPPF makes it very clear that government wants LPAs to work together particularly on joint strategic plans.	Not endorsing the Strategic Growth Plan would run contrary to central government intentions for strategic planning and be out of compliance with the NPPF. Joint working has also raised the profile of Leicester and Leicestershire partners with statutory agencies which has contributed to positive infrastructure funding request outcomes. Not endorsing the Plan would mean the borough could no longer be part of the Leicester and Leicestershire Strategic Growth Plan partnership
The Duty to Co-operate	The revised NPPF strengthens the requirements of the Duty to Co-operate effectively turning it into a Duty to Agree	Without endorsing the Plan the borough would not be able to demonstrate a Duty to Co-operate which is fundamental to progressing a sound Local Plan through to Examination;
Delay in the preparation of the Local Plan	The SGP provides a framework for preparing individual Local Plans and agreeing the spatial distribution for growth	A lack of Local Plan progression and in particular housing delivery will lead to central government intervention. The borough will be more exposed to speculative growth proposals and therefore planning by appeal is likely. In addition without a Local Plan there could potentially be calls to address unmet need from outside the borough
Delivering new infrastructure	The Government believes that infrastructure and growth are closely aligned and are minded to support funding bids backed by joint working. Disaggregated and piecemeal funding bids by individual authorities are not likely to be successful as they can't deliver growth at the scale and pace required.	Without being part of the Leicester and Leicestershire Strategic Growth Plan partnership, it is unlikely that the borough would be able to successfully bid for major infrastructure investment as a single authority
Lack of confidence in the ability of the borough to plan strategically	The revised NPPF makes it very clear that government wants LPAs to work together particularly on joint strategic plans.	Without the support of the Leicester and Leicestershire Strategic Growth Plan partnership the borough could potentially lose responsibility for strategic planning. Central government would then send in an intervention

		team (for example staff from the County Council);
Deletion of the A46 Expressway option	Growth would need to be accommodated within Leicestershire's existing infrastructure and major employment centres including the borough and its villages and rural areas.	Even without A46 expressway, 35,000 + homes still need to be accommodated in Leicestershire. However, the borough would not be able to negotiate housing distribution so easily outside the Leicester and Leicestershire Strategic Growth Plan partnership as a single authority