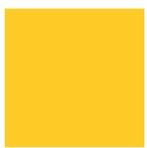


Land at Six Hills, Charnwood

Representation Number: 569



Boyer

Report Control

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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Knightwood Developments Limited (Representation Number: 569) in regard to the 'Charnwood Local Plan' consultation which is now being called upon to assess the 'Examination Consultation on Leicester and Leicestershire Housing and Employment Land Needs'.
- 1.2 The below representations provides Knightwood Development's response to the topics contained in the consultation, specifically in relation to the scale and distribution of housing and economic growth in the Borough and addressing the need for Leicester City Council to meet their unmet housing distribution targets.
- 1.3 These representations are a continuation of the promotion of Knightwood Development's land interest at Land located at Six Hills, Charnwood, Leicestershire.
- 1.4 This Statement accompanies the submitted online consultation response form.
- 1.5 Paragraph 35 of the NPPF provides the criteria by which emerging Local Plans are found to be 'sound' when subjected to examination; namely that the Local Plan must be positively prepared, justified, effective and consistent with national policy. Our representations are grounded in directing the emerging Local Plan towards those options for housing and economic growth that will result in the emerging Local Plan being found sound, in this regard. It is contended that the options that are not supported in these representations would risk the emerging Local Plan being found unsound, for reasons detailed below.

2. RESPONSE TO CONSULTATION TOPICS

Issues 2: The Scale of the Unmet Need for Housing

Why is an unmet need of 15,900 dwellings tested through the Sustainability Appraisal (Exam 47a) and how was this figure arrived at? Has the figure 18,700 dwellings been tested?

- 2.1 Although related to Plan Making rather than the production of a Statement of Common Ground (SoCG), Paragraph 38 of the NPPG states that “evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. Strategic policy-making Authorities may wish to consider ensuring that their assessment of the strategies for housing, employment and other uses are integrated”.
- 2.2 The Sustainability Appraisal (SA) should have been produced with the benefit of the Housing Economic Needs Assessment (HENA) to inform the proposed apportionment in the SoCG. As the three documents were drafted simultaneously by two different authors, the SA was drafted having regard to the June 2021 SoCG. It therefore needs updating so Scenario A works to the HENA’s identified need of 18,700 dwellings. The other Scenarios can then be calculated from this base figure.
- 2.3 The best opportunity to update the SA would be following the publication of the Strategic Transport Assessment and Strategic Growth Options and Constraints Mapping. Only at this point would it be testing a robust evidence base.

Issue 3: Apportionment of the Unmet Housing Need

10.10 The Housing Distribution Paper (paragraph 7.3) (Exam 45) refers to the proposed distribution of the unmet need as an ‘interim arrangement’. What does this mean, is it justified and how would any changes to the evidence or other circumstances be dealt with?

- 2.4 Paragraph 20 of the NPPG expects that Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated.
- 2.5 The Charnwood Local Plan is now at examination and there is still no consensus on collaboration with a clear intention for the SoCG to evolve further as more work is undertaken.
- 2.6 ‘Interim arrangement’ should be terminology concerning to the Inspector as it demonstrates that the work undertaken is unfinished, this is something HBBC agree with in their comment that the HENA and the Sustainability Appraisal form two evidence base documents out of the four committed to in the June 2021 SoCG. Until all four documents can be read together there is no clear evidence to demonstrate that the apportionment of the unmet need is adequately justified.

10.11 Are the following factors set out in the Housing Distribution Paper a robust and logical basis for the apportionment of the unmet need of 18,700 dwellings to 2036:

- **The functional relationships between the respective Leicestershire Authorities and Leicester City based on migration and commuting patterns;**
- **Balancing the provision of jobs and homes**
- **Deliverability, based on potential supply, the rate of housing growth and adjustments to support a sustainable and deliverable distribution of development**

Are there any other relevant factors which should be taken into consideration?

- 2.7 The proposal forms a starting point for apportionment, however the June 2021 SoCG refers to other relevant factors which have not yet been taken into account at this stage. Clearly the suitability of sites and the capacity of areas to accommodate development is going to require careful consideration, particularly when considering the vast scale of new housing required. This ties in to the yet to be published Strategic Transport Assessment and Strategic Growth Options and Constraints Mapping. Once published, the proposed apportionment can be properly tested, with assistance from a fully informed SA.

10.12 Is the proposed 1.4% ‘cap’ to the redistribution of housing provision justified as a general approach and in relation to Charnwood in particular? What effect does the 1.4% cap applied to Charnwood have on the redistribution of the residual unmet need across the other Leicestershire Authorities

- 2.8 Charnwood has the second strongest functional relationship to Leicester at 25%. Factored in to this, Charnwood has the second highest percentage gross migration at 25%, highest out migration of 29% and the second highest commuter flows at 24% of the total. Charnwood is shown to have the greatest capacity for additional homes compared to any other LPA with an identified growth capacity of 1.6%. This would equate to accommodating an additional 289 dwellings per year taking their requirement from 1111 to 1400 dwellings per annum.
- 2.9 However, it is proposed for this growth rate to be capped at 1.4% and the rest distributed to other councils such as Hinckley and Bosworth. This is to, as SoCG words it, avoid issues of over concentration of development. This removes 211 dwellings per annum from Charnwood, moving 32 to Blaby, 85 to Hinckley & Bosworth and 80 to North West Leicestershire. Leaving the requirement for Charnwood at 1,189 per annum.
- 2.10 Hinckley and Bosworth strongly reject the cap and question whether the evidence to support it is robust. They consider that the 187 dwelling shortfall should be tested through each LPAs Local Plan process, including the current Charnwood Local Plan. Fundamentally they consider the use of stock growth is not a measure of the deliverability of housing in a particular area. The capping of redistribution based on a 1.4% stock growth levels is considered arbitrary and not supported by evidence. The proceeding justification for the uplift for Hinckley and Bosworth seeks to reference job opportunities but this is considered to have been already considered earlier in the methodology.

- 2.11 The previous SoCG (June 2021) was clear that the apportionment of unmet need would be informed by 4 pieces of work. Only two of these pieces have been completed, the HENA and the SA. Therefore, the apportionment is a starting point for testing and may be amended based on the completion of the Strategic Growth Options and Constraints mapping work and the Strategic Transport Assessment and the subsequent updated SA and the outcome of any local plan “testing”.
- 2.12 The Inspector for the Charnwood Local Plan examination should have regard to HBBC’s comments and be testing the evidence behind the apportionment through the Local Plan. For this to be effectively tested, the remaining two evidence base documents need to be available.
- 2.13 The SA for the SoCG is already out of date and doesn’t align with the identified housing need. The unmet need is quantified in the SA as 15,900 however the updated HENA (2022) identifies an unmet need of 18,700. Therefore the whole approach to spatial distribution is based on under delivering by 2,800 dwellings. Before the SA can be effectively tested, Scenario A (the starting point for the SA) needs to provide for the full need of 18,700 dwellings. Any alternative Scenarios can then be calculated against this base figure.

10.15 How has the SoCG Sustainability Appraisal report (Exam 47a) informed the apportionment of the unmet need?

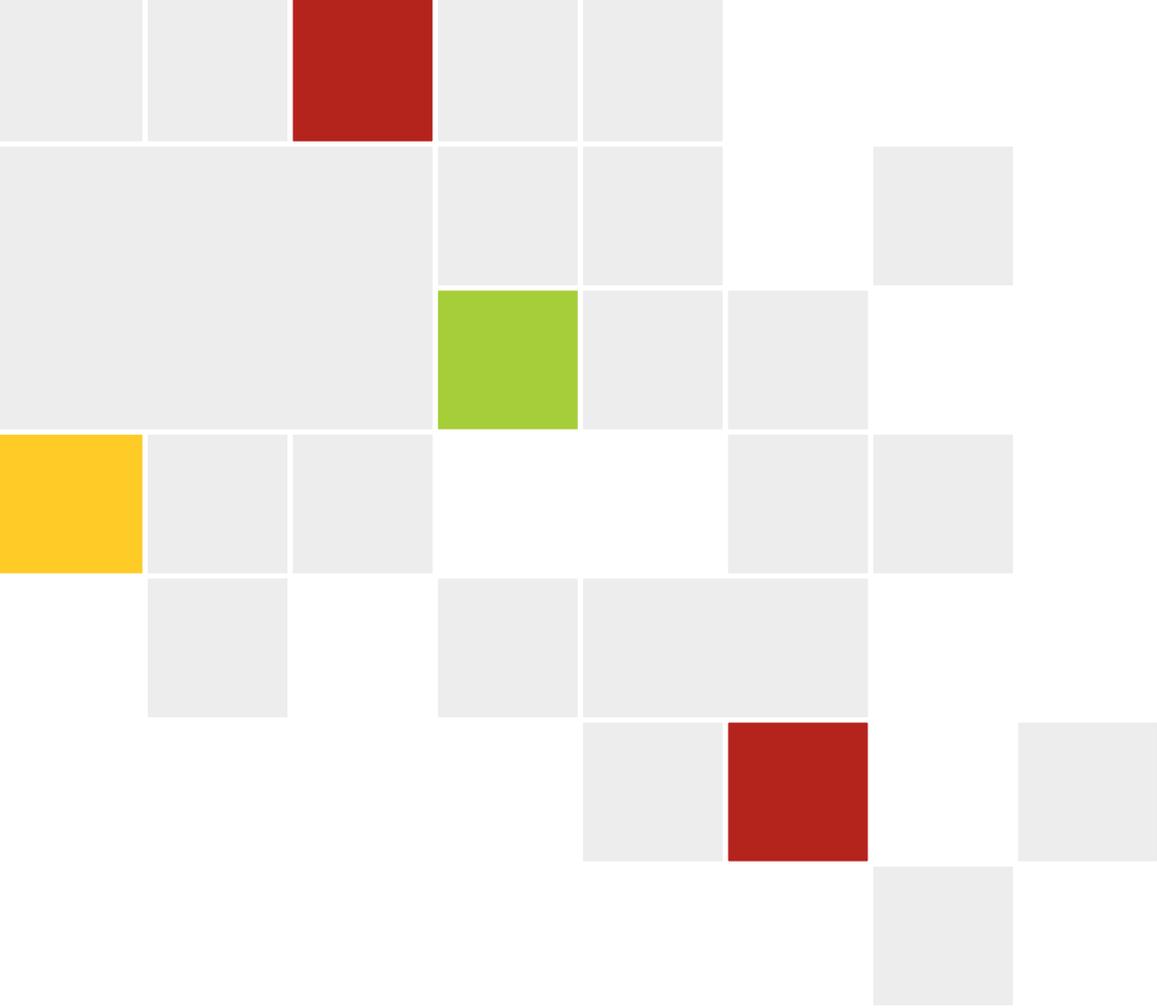
- 2.14 It does not appear to have made any contribution to the apportionment which appears to be solely informed by the HENA. This would explain the use of the term “interim arrangement”. There might be an intention to update the apportionment when the Housing Distribution Paper can be updated following the publication of the Strategic Growth Options and Constraints Mapping, the Strategic Transport Assessment and an up to date SA.
- 2.15 This again draws us back to a conflict between Paragraph 38 of the NPPG and how the SoCG is being evidenced. Judgements are being made on key spatial planning issues without a comprehensive evidence base to inform them.

10.16 Overall, is the apportionment of 78 dwellings per year to Charnwood over the period 2020 – 2036 to contribute towards the unmet need of 18,700 dwellings justified by the evidence, robustly based and will it support a sustainable pattern of development as required by the NPPF Paragraph 11?

- 2.16 Not all the evidence is yet available and until all four evidence based documents referred to in the June 2021 SoCG are available it is premature to make such a final judgement. That being said, HBBC raise valid concerns regarding the robustness of the evidence to inform the 1.4% cap on housing stock applied to Charnwood.

3. CONCLUSION

- 3.1 The proposed apportionment is informed by an incomplete evidence base which, in part has contributed to an SoCG which does not represent a consensus between all the Authorities and cannot be comprehensively tested as part of this Examination.
- 3.2 Only following the publication of the Strategic Transport Assessment, Strategic Growth Options and Constraints Mapping and an updated SA should the SoCG be proposing apportionment. It would then be up to the Inspector to test the apportionment based on a comprehensive evidence base. Referring back to paragraph 2.1 of this representations and paragraph 38 of the NPPG, it appears the SoCG is respectively collecting evidence to inform a predetermined judgement.
- 3.3 In testing the evidence base, (which is incomplete) there are flaws which the Inspector is testing in the extensive list of questions for the LPA. It would have been prudent to delay the publication of the latest SoCG until the full evidence base was available to inform the apportionment. This could have addressed some of the Inspectors concerns and allowed the Inspector to test a completed piece of work, rather than one that has been rushed to the extent that it has been published incomplete and not fit for purpose.



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