

Matter 10 Leicester and Leicestershire Housing and Employment Needs

For Hollins Strategic Land LLP (Ref 366)



Project: 18-555
Site Address: Melton Road, Queniborough, Charnwood, Leicestershire, LE7 3FP
Client: Hollins Strategic Land LLP (Ref 366)
Date: 15 September 2022
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1. Introduction

1.1 Emery Planning is instructed by Hollins Strategic Land (hereafter referred to as 'HSL') (Ref 366) to attend the Examination and to make representations to the current consultation on the Leicester and Leicestershire Housing and Employment Land Needs. These comments focus on the MIQs for Matter 10. Many of the MIQs are for the Council to answer but we set out our position on the relevant questions as they relate to our representations on the housing requirement for Charnwood.

2. Issue 1 – The Assessment of Housing Need

2.1 In our representations and statements to the Examination we stated that it was important given that the unmet need from 2020 has been established that there would be a clear timetable for the local plan review to take place. After the Examination opened, we note that the LPA accepted that it would be willing to meet Charnwood's apportionment of Leicester's unmet housing need through this Plan, rather than as part of any Plan review.

2.2 It is clear that the assessment of the housing needs for Leicester and Leicestershire has been undertaken under the Duty to Co-Operate and Exam43 is a culmination of that work. Given that the purpose of paragraph 60 of the Framework is to boost supply, then we support meeting the identified housing need through the Plan without delay.

2.3 As to whether there has been a robust assessment of the relevant factors, Exam44 states that "there are factors which might result in an upward adjustment to the overall housing need; with the evidence finding no such factors across the Leicester & Leicestershire Housing Market Area (HMA)"¹.

2.4 In our Matter 4 Statement we set out why we consider that the affordable housing need does justify a higher housing requirement than the 1,111 set out in the Plan for Charnwood and do not repeat that in this statement. The quantum of development that Charnwood has been requested to deliver is 78 dwellings per annum, which equates to 1,248 dwellings over the plan period. This would not change our overarching position on the need for an uplift in Charnwood on meeting affordable needs.

¹ Paragraph 3.18 of Exam44b



- 2.5 We consider that the higher median workplace-based affordability ratios for 2021 (8.41) to that in 2020 (7.68) mean that the standard method would increase to 1,152 dwellings per annum. It also reinforces our view that there should be an uplift due to the lack of affordable housing in the plan area.
- 2.6 The use of the 2020 median workplace-based affordability ratios for the Charnwood Local Plan was appropriate at the time of submission, but the recognition by the LPA that they can meet their share of Leicester's unmet needs at this stage through additional or increased capacity on allocations means that the additional 40 dwellings per annum due to the standard method should also be considered at this stage.

3. Issue 2 – The Scale of the Unmet Need for Housing

- 3.1 In answer to 10.7, given that the figure of 18,700 has been the result of the work undertaken by the Duty to Co-operate we see this as the appropriate figure to progress with as it is based on the application of the standard method which is the minimum assessment of housing need. If the 18,700 figure had been based on other uplifts, for example an affordable housing or economic uplift, which could be reduced through the Examination for the Leicester Plan, should the Inspector consider it not to be sound, then there would be a risk in using the 18,700 figure at this stage. That does not apply in this case given the 18,700 is based on the standard method which is the minimum figure to use.
- 3.2 We recognise, as set out in 10.7, that this will be tested further through the Examination of the Leicester Local Plan, but given the lack of urban capacity and infrastructure to meet the housing needs in the City by 2036, then meeting the existing and future housing needs in those adjoining authorities should not be negated due to a restrictive political boundary for the City where the Leicester urban area already spills into those adjoining authorities and there is a close relationship for migration and commuting.
- 3.3 Question 10.9 asks if the scale of the unmet need of 18,700 dwellings changes as a result of the Leicester Local Plan Examination, how would this be addressed by the respective Leicester and Leicestershire local authorities under the Duty to Cooperate. This is for the LPAs to answer but our position, as set out in 3.1 above, is that we see little prospect of this occurring given the use of the standard method and the restrictive urban capacity and infrastructure in the City to meet its needs.



4. Issue 3 – Apportionment of the Unmet Housing Need

- 4.1 Section 4 of Exam 45 looks at the distribution based on functional relationships across the HMA. Paragraph 4.1 of Exam 45 sets out the PPG guidance, as does the Inspectors introduction to Issue 3. We also note, as do the Inspectors, that this is an Interim distribution to meet unmet needs to 2036 given the need for strategic infrastructure assessment.
- 4.2 As noted under Issue 2 above, given the lack of urban capacity or infrastructure to meet the housing needs in the City by 2036, it would not be appropriate to negate meeting the existing and future housing needs in adjoining authorities due to a restrictive political boundary for the City particularly when the Leicester urban area already spills into adjoining authorities and there is a close functional relationship between settlements.
- 4.3 Our particular interest is in Charnwood which Table 4.1 of Exam45 shows as having the second strongest relationship of the Leicestershire authorities with Leicester for migration. Table 4.2 then shows the greatest outmigration to Charnwood at 29% of the Leicestershire total.
- 4.4 Table 4.3 (Commuting Relationships to Leicester City, 2011) of Exam45 sets out the figures for in-commuting and out-commuting to and from Leicester which is helpfully summarised in paragraph 4.10 which states *“Turning to commuting dynamics, the strongest in-commuting to Leicester is from Charnwood and Blaby, followed by Oadby and Wigston”*. Paragraph 4.13 also states that *“where there is outcommuting from the City, locating homes in these areas may help to reduce journey times/ distances”*. When read as a whole Charnwood is very well positioned to meet the unmet needs of Leicester sustainably.
- 4.5 We consider the approach to apportionment of the unmet need and the blended apportionment to be well founded. Table 4.5 shows that 25% of the unmet need is to directed to Charnwood which equates to 289 dwellings. It is clear from Table 6.5 that Charnwood has the supply to meet the housing target, but as the report goes on to state, that would result in a stock growth of 1.6% which the authors consider there to be a considerable risk based on previous growth rates across the Midlands. Therefore, a cap of 1.4% has been placed on Charnwood.
- 4.6 Table 3 of Exam43 quantifies the apportionment of Leicester City's Unmet Local Housing Need 2020 to 2036, of which Charnwood's share is 78 dwellings per annum. This is due to final adjustments to support deliverability and manage commuting which has then been mainly



redistributed to Blaby, Hinckley and Bosworth and North West Leicestershire. That has been undertaken with the aim of meeting the unmet needs in the Plan period.

- 4.7 Therefore, in answer to 10.16 we consider that the apportionment of 78 dwellings per year to Charnwood over the period 2020 - 2036 is appropriate and the Plan can progress in allocating land to meet this need. HSL's specific interest is the land north of Melton Road, Queniborough which is proposed for allocation (Site Ref HA65) under Policy DS3 for 55 dwellings. Following the pause to the hearing sessions, we have also engaged with the LPA on increasing the capacity on the proposed allocation and our site-specific work, undertaken to prepare an application, demonstrates that the site can deliver up to 100 dwellings.



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