

Charnwood Local Plan Examination Matters and Issues Statement

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Matter 10 Leicester and Leicestershire Housing and Employment Land Needs

1.0 Issue 1 – The Assessment of Housing Needs

Q 10.4 - Is the minimum local housing need figure for Charnwood robust and justified?

- 1.1 Yes. CEG supports Charnwood’s commitment to meet the Government’s standard methodology based calculation of housing need (1,111 dwellings per annum (dpa)).

2.0 Issue 2 – The Scale of the Unmet Need for Housing

10.9 - 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? What would the implications be for plan making in other authorities in the Housing Market Area?

- 2.1 This is for the Council to answer. CEG is however of the view that plan making in the respective LPAs, including Charnwood, should continue and seek to plan for Leicester’s unmet need now, rather than wait for the Leicester Local Plan Examination to be concluded, to avoid delay. If there are considerable changes as a result of the Leicester Local Plan Examination and adoption, any adopted or well-advanced draft Local Plans could be reviewed.

3.0 Issue 3 – Apportionment of the Unmet Housing Need

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?

- 3.1 CEG agrees with general approach taken in EXAM43 to apportion the unmet need which includes assessment of both quantitative and qualitative factors.
- 3.2 While implied in the identified considerations, connectivity and sustainable transport links should be recognised as an important factor. It is right that the distribution of housing should seek to minimise the need to travel, but where travel cannot be avoided the identified locations and related local plan policies should seek to support sustainable travel patterns and choices.
- 3.3 The planning permission for the North East of Leicester Sustainable Urban Extension (NEoL SUE, now known as Thorpebury) followed a local plan allocation by Charnwood in 2014. The detailed assessment which was undertaken at the application stage confirms the functional relationship and connectivity between this area of Charnwood and the City, and ongoing works to implement Phase 1 demonstrate its deliverability.

10.13 Have land supply, capacity and constraints issues been assessed in the apportionment of the unmet need? If not, how will these matters be addressed

- 3.4 This is for the Council to answer. However, as set out in response to question 10.16 below, in principle there is scope to increase the delivery rates and/or density of development within areas of Thorpebury to assist Charnwood with meeting some of the additional housing need identified for the Borough.

10.14 What role will the review of the Strategic Growth Plan (EB/DS/6) have in the distribution of housing growth across the Leicester and Leicestershire Housing Market Area in the longer term

- 3.5 This is for the Council to answer. We do however note that the current Strategic Growth Plan (SGP, December 2018) identifies proposed growth areas and favours strategic development coordinated with new infrastructure. CEG welcomes this strategic approach and the delivery of essential supporting infrastructure alongside development. We would hope that a similar approach will be maintained in the future.

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 NPPF paragraph 11?

- 3.6 It is for the Council to provide the technical justification. However, given the clear functional link between areas of Charnwood Borough and Leicester City, CEG agrees Charnwood should accommodate some of Leicester's unmet housing need.

- 3.7 This functional relationship was recognised specifically in relation to Thorpebury during consideration and determination of the hybrid planning applications in 2014 by both the Borough Council and the City Council.
- 3.8 For example, the Charnwood Plans Committee report (6th November 2014) recognises the proximity of the site to Leicester and the opportunities the SUE would provide for City residents: *“The south-western edge of the site abuts existing housing in Leicester and Thurmaston. In the case of this planning application, the location of the SUE, at the edge of the urban areas of Thurmaston and Leicester affords the opportunity for residents to access the range of facilities available within these centres. In turn, the provision of new homes – and therefore a workforce – in the Leicester PUA will support the activity and economy of the City...”*
- 3.9 The Leicester City Planning and Development Control Committee Report (24th September 2014) also notes: *‘The SUE has support in principle with the Core Strategy and there is a need to accommodate housing growth and provide employment land. The proposal has been considered in this context and is necessary for the delivery of the SUE.’*
- 3.10 In principle, there is scope to increase the delivery rates and/or density of development within areas of Thorpebury to assist Charnwood with meeting some of the additional housing need identified for the Borough. Thorpebury is functionally well positioned to accommodate some of this housing need and would support a sustainable pattern of development.
- 3.11 CEG and the delivery partners are in ongoing discussions with the Council regarding the delivery of the SUE and would welcome further discussion in relation to both the housing quantum and trajectory for Thorpebury.

4.0 Issue 5 – Apportionment of the Unmet Need for Employment

10.23 - Are the following factors set out in the Employment Distribution Paper (Exam 46) a robust and logical basis for the apportionment of the unmet need for 23 hectares of employment land to 2036:

- **Location of authorities adjoining Leicester given their accessibility to the city and associated supply of labour (Charnwood, Blaby, Harborough, Oadby and Wigston);**
- **Proximity to the City, preferably adjacent to the existing urban area;**
- **Sites well connected to the City by A roads and ideally connected to the wider strategic network (A road/motorway network).**

- 4.1 CEG agrees with general approach taken in EXAM43 to apportion the unmet employment need which includes assessment of both quantitative and qualitative factors. It is also important to recognise the location of new homes when distributing the unmet employment need and identifying sites for employment development.
- 4.2 Consideration should also be given to the Strategic Growth Plan which, if realised, would improve the accessibility of sites outside of Charnwood Borough (for example on the A46

‘Expressway’). This could release additional land on an improved strategic road network, but outside of Charnwood Borough, which could be appropriate to accommodate an element of the 23 hectares of unmet employment land need.

10.24 - Is meeting all of the unmet need for 23 hectares of employment land within Charnwood justified? Will it meet the need for different types of employment land in a choice of locations and promote sustainable patterns of development as required by paragraph 11 of the NPPF?

- 4.3 It is understood that the 23 hectares of Leicester’s unmet need is for ‘B2 - General Industrial and B8 - Small Warehousing units less than 9,000sq.m’ (para 3.16 of the Draft Statement of Common Ground, EXAM 43).
- 4.4 EXAM 46 refers to Thorpebury as a notable allocation in Charnwood which is well positioned and suitable for meeting ‘local employment needs’ for Leicester (para 1.13). It should be recognised that the 13 hectares of employment land within Thorpebury will be provided across the SUE as a whole. This includes smaller scale local employment spaces within the district and local centres close to residential uses as well as a larger concentration of employment land.
- 4.5 Therefore, whilst there may be scope within areas of the Thorpebury SUE to accommodate a portion of the unmet employment need, the ability of the SUE to contribute towards meeting the (unmet) employment need will depend on the nature and scale of the requirements, commercial demand and market forces.
- 4.6 To ensure a range of commercial demands and market forces can be accommodated, and to enable flexibility in the longer term, due consideration should be given to how the 23 hectares of employment land could be accommodated in the wider Functional Economic Market Area. This assessment should not be artificially restricted by the LPA boundaries.

10.25 - Should some of the unmet need be apportioned to any of the other Leicestershire authorities based on the factors outlined above?

- 4.7 Please refer to responses to questions 10.23 and 10.24 above.

10.27 - Is the apportionment of all of the unmet need for employment land to Charnwood justified by the evidence and will this be effective in meeting the employment land needs of the Functional Economic Market Area as a whole? Does this allow for flexibility and choice?

- 4.8 Please refer to responses to questions 10.23 and 10.24 above. The apportionment of unmet need for employment land to Charnwood should be reviewed, including with consideration to the intentions of the Strategic Growth Plan. Apportioning some of this need across the wider FEMA would allow for greater flexibility and choice to meet employment needs in the longer term.