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Dear Ian

**Charnwood Local Plan Examination
Examination Consultation on Leicester and Leicestershire Housing and Employment Land Needs
Response on Behalf of Redrow Homes**

I would be grateful if you could accept this response on behalf of Redrow Homes in advance of the examination hearing Matter 10.

As communicated separately I intend to participate at the Matter 10 hearings scheduled for 25 and 26 October. I expect that Peter Goatley KC will also participate at this hearing on behalf of Redrow Homes.

Background

As you will be aware Savills and Chris Young QC participated at the hearings into Matter 1 and Matter 2 on behalf of Redrow Homes.

Redrow Homes have an interest in land south of Sileby, Leicestershire which is considered deliverable for residential-led development.

Redrow Homes have prepared a vision for sustainable development south of Sileby comprising some 665 dwellings, land for a primary school, land for a local centre, green and blue infrastructure and biodiversity net gain. Vehicular access would be taken off Ratcliffe Road.

Our request is for identification of this site as a proposed allocation for residential-led development as part of the local plan, particularly in light of the fact that the Council has agreed in principle to plan for its share of unmet need from Leicester City.

Sileby is identified within the current local plan as one of the Service Centres and this is unchanged in the submitted local plan.

Sileby is considered to perform well in terms of services and facilities and hence is capable of accommodating more development.

Our response to the consultation follows the Matters, Issues and Questions prepared by the Planning Inspectors.

10.1 Statement of Common Ground

Procedurally we have stated that it would be preferable for the emerging Leicester City Local Plan to be more advanced than the Charnwood Local Plan such that matters such as housing and employment growth, capacity for this within the City's boundaries and distribution of housing and employment across boundaries could have been examined. This could have informed the signing of a statement of common ground by the Leicester and Leicestershire authorities.



As it stands there remains uncertainty over the status of common ground and we suggest this needs to be resolved to inform examination of the Charnwood Local Plan.

We have yet to see any certainty that all of the Leicester and Leicestershire authorities agree to the statement of common ground. For reasons that might only partly relate to the Leicester and Leicestershire Housing and Employment Land Needs, we understand that Hinckley and Bosworth Borough Council do not fully support the draft statement of common ground and might have paused progress on their local plan. Part of this is mentioned in the statement at EXAM 43 within the section on Key Strategic Matters on Which Authorities Do Not Agree.

We consider the implications for the Charnwood Local Plan is that there is no clarity and no certainty over the draft statement of common ground.

Issue 1 – The Assessment of Housing Need

The change in position by Charnwood Borough Council in respect of Leicester and Leicestershire housing and employment land needs stated verbally at the hearing into Matter 1 on 28 June 2022, represents a significant change in circumstances compared with the submitted local plan.

The change in position by the Council has had the effect of debasing the growth targets within the local plan and some of the evidence that underpins the local plan as submitted.

An important aspect of the change in position by the Council is that uncertainty will need to be planned for within main modifications to this local plan. For example a review policy will still be needed in the scenario that common ground is not agreed and/or the unmet need of Leicester City increases.

Given the pause in the Examination, the Council should now use the 2021 affordability data for calculating the standard method which would mean an increase of 45 dpa (675 over a 15 year plan period). The minimum local housing need figure for Charnwood should therefore be 1,156 dpa.

The fact there has been a 12% increase in population but only a 9.2% increase in dwelling stock over the same period points to a level of suppressed household formation which would justify an uplift in the level of need to overcome it. Suppression of household formation can be cyclical because Local Authorities will see households are not being formed and assume that house building is not required thus further suppressing formation.

Issue 2 – The Scale of the Unmet Need for Housing

The draft statement of common ground indicates that the residual unmet need of 18,700 dwellings will be tested through the Leicester Local Plan. As mentioned above it would be preferable for the City's Local Plan to be more advanced than the Charnwood Borough given the unmet needs consideration.

We suggest that Leicester City Council comment on the figure of 18,700 dwellings within the context of this examination. For example the City's Strategic Housing and Economic Land Availability is 2017 covering the period 2017-2032.

We are concerned that the unmet needs figure and evidence behind it was not part of the submission of the Charnwood Local Plan for examination. The submitted plan acknowledges this and that additional work is needed on Leicester City's housing needs. We would welcome the opportunity to review and comment on such.

As noted above, even if the Charnwood Local Plan includes a level of unmet need, it will still need to contain a review policy such that the Council commits to commencing a review if the unmet need figure increases during the Leicester City Local Plan Examination, or if Charnwood Borough's share increases through a revised Statement of Common Ground.

Issue 3 – Apportionment of the Unmet Housing Need

The absence of certainty over the draft statement of common ground means it is not possible to plan with any degree of certainty on the amount of unmet need or the apportionment of unmet needs across the Leicestershire authorities.

We do not consider that the apportionment of 78 dwellings per year to Charnwood over the period 2020 to 2036 as contribution towards the as of yet untested figure of 18,700 dwellings is robustly based and support a sustainable pattern of development.

We do not consider there is a robust case for such a low apportionment to Charnwood Borough relative to some of the other Leicestershire authorities.

We do not consider there is a robust case to apply a cap to the unmet need apportionment to Charnwood. This is especially relevant where there are deliverable sites being promoted for development beyond residential and where the affordability gap is widening. More should be done to plan for growth within the County of Leicestershire and this local plan for Charnwood Borough has the ability to do this.

A matter for the spatial strategy and also for a subsequent hearing on housing land delivery, selection and supply is that the Council has not reviewed and tested the spatial strategy or site selection following the significant changes in circumstances arising from the Council's change in position on 28 June 2022.

The robust position would be to have re-assessed and re-appraised the spatial strategy looking at a range of options to accommodate the unmet need.

Issues 4 and 5

No response to these issues.

Conclusion

I would be grateful to receive acknowledgement of receipt of this response and that this been provided to the Planning Inspectors

Please do not hesitate to contact me with any queries on this.

Yours sincerely



David Bainbridge MRTPI
Planning Director

cc. Redrow Homes, Silverfox Development Consultancy