

Charnwood Local Plan examination – Matter 10 (Leicester and Leicestershire housing and employment land needs) Hearing Statement

Rainier Developments

September 2022

1.1 This Hearing Statement is submitted on behalf of Rainier Developments in relation to their land interests east of Iveshed Road, Shepshed.

1.2 We respond to Q10.7-Q10.14 and Q10.16 inclusive.

Issue 2 – the scale of the unmet need for housing

Q10.7 Is the 18,700 dwelling figure a reasonable working assumption for Leicester’s unmet need from 2020 to 2036 as set out in the Housing Distribution Paper (paragraph 3.7) (Exam 45) and the SoCG (paragraph 3.19), pending further testing through the Leicester Local Plan? Is it a reasonable basis on which to apportion the unmet need across the Leicestershire authorities?

1.3 Yes, it is based on the most up to date evidence.

Q10.8 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 of 18,700 dwellings been tested?

1.4 It is not clear why an unmet need lower than the evidenced working assumption of 18,700 homes has been tested. There is no justification provided as to why a lower unmet need figure would be appropriate, particularly given the housing distribution paper (EXAM45) is clear from the outset that the standard provides a “...*baseline or minimum level of provision for each Leicestershire authority*” (paragraph 2.2).

Q10.9 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?

1.5 There is always uncertainty when one authority in a housing market area (HMA) progresses a plan ahead of another within the HMA and there is an unmet need (see the Coventry and Warwickshire HMA). As referred to in response to earlier questions, there is now sufficient evidence to make an informed decision on the scale of the unmet need. Any change to this unmet need could be resolved through a future review of the plan.

Q10.10: 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?

1.6 With all Leicester and Leicestershire authorities (not including Hinckley and Bosworth) formally agreeing the proposed distribution of the unmet need, it is not clear how the distribution reflects an 'interim arrangement'. We would welcome the Council's clarification on this in this respect.

Q10.11 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?

1.7 Yes, subject to the relevant evidence informing the apportionment of the unmet need, such as available supply (please see our response to Q10.13 below).

Q10.12 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?

1.8 No, the 1.4% cap appears arbitrary and not justified, particularly in the case of Charnwood. Different authority areas have different levels of suitable supply, that may well exceed 1.4% cap (as appears to be the case for Charnwood).

1.9 As per Q10.13, any judgements on the apportionment of the unmet need should be based on evidence, including each Councils' Strategic Housing and Employment Land Availability Assessments (SHELAA). It is not clear that this has been taken into consideration, which is a more informed and evidenced indicator of the potential supply than a notional cap.

Q10.13 Have land supply, capacity and constraints issues been assessed in the apportionment of the unmet need? If not, how will these matters be addressed?

1.10 As per paragraph 7.4 of EXAM45, 'deliverability, which incorporates issues of both land supply and market capacity' has been considered in calculating the apportionment of the unmet need. The Council should clarify what evidence has informed this. As a minimum each authorities' SHELAA should have been considered, which assesses constraints.

Q10.14 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?

1.11 The Strategic Growth Plan (SGP) is a non-statutory plan which provides a high level vision for growth across the HMA up to 2050. It is the evidence that underpins the SGP that should influence the distribution of housing growth across the HMA.

Q10.16 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?

1.12 It is welcomed that Charnwood is willing to contribute to Leicester City's unmet need. The total amount however needs to be considered in the context of the 1.4% cap not being justified given Charnwood's strong functional relationship with Leicester and Charnwood's potential supply of suitable sites as identified in the SHELAA.