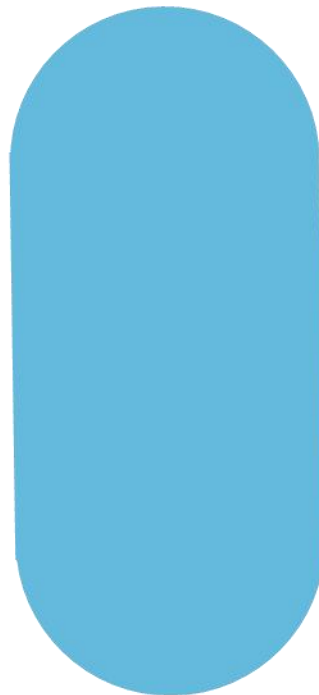


**WRITTEN STATEMENT IN RESPECT OF THE
CHARNWOOD LOCAL PLAN 2021-37
EXAMINATION**

**MATTER 1- DUTY TO COOPERATE AND OTHER
LEGAL MATTERS**

On Behalf of Richborough Estates, the Bowler Family and William
Davis Ltd



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Richborough Estates, the Bowler Family and William Davis Ltd, in response to the Inspectors' Matters, Issues and Questions for the examination hearings for the Charnwood Local Plan 2037.
- 1.2 Richborough Estates, the Bowler Family and William Davis Ltd are promoting land to the south of Loughborough. The land is specifically covered under Policy DS3, site reference HA15.
- 1.3 Both Richborough Estates and William Davis have previously made representations to the Regulation 19 Local Plan consultation.

2. MATTER 1- DUTY TO COOPERATE AND OTHER LEGAL REQUIREMENTS

Issue 1 –Whether the Council has complied with the Duty to Cooperate in the preparation of the Plan

- 2.1 The Leicester & Leicestershire Authorities - Statement of Common Ground (SOCG) relating to Housing and Employment Land Needs (April 2022) has been published on the strategic growth plan site¹.
- 2.2 The SOCG provides the latest position in respect of local housing need (utilising the standard housing method), unmet need and housing supply. Our comments in respect of housing requirements and housing land supply will be dealt with through statements for Matters 4 and 7 respectively.
- 2.3 However, we note that the SOCG does not specifically bring these three items together with respect to the Inspector's question 8 for this Issue:

If the Statement of Common Ground concludes that more housing is needed in Charnwood to meet Leicester's unmet need, does the development strategy set

¹ <https://www.lstrategicgrowthplan.org.uk/wp-content/uploads/2022/05/Statement-of-Common-Ground-002.pdf>

out in Policy DS1 represent a robust and appropriate approach for the distribution of further housing, employment and other development in the longer term?

2.4 The table below collates the Local Housing Need (Table 1), distributed unmet housing need (Table 3) and committed housing supply (Appendix B) into a single table.

	Local Housing Need		Apportionment of Unmet need		Total Housing Requirement		Total projected delivery ² 20-36	Gap analysis ³
	per annum	20-36	per annum	20-36	per annum	20-36		
Blaby	341	5456	346	5536	687	10992	6342	4650
Charnwood	1111	17776	78	1248	1189	19024	20874	-1850
Harborough	534	8544	123	1968	657	10512	10236	276
Hinckley and Bosworth	472	7552	187	2992	659	10544	5438	5106
Leicester	2464	39424	-1169	-18704	1295	20720	20721	-1
Melton	231	3696	69	1104	300	4800	6929	-2129
North West Leicestershire	372	5952	314	5024	686	10976	8960	2016
Oadby and Wigston	188	3008	52	832	240	3840	2402	1438
TOTALS	5713	91408	0	0	5713	91408	81902	9506

2.5 The table identifies a standard housing method figure for Charnwood of 1,111 homes a year (2020-2036) and a standard housing method figure for the Leicester and Leicestershire Housing Market Area (HMA) of 5,713 homes a year (2020-2036).

2.6 The SOCG distributes 1,169 unmet homes a year (18,704 homes in total between 2020 and 2036) from Leicester across the HMA. In very simple terms the homes have been distributed in an attempt to balance the functional relationship between homes and jobs, with some adjustments to manage delivery and commuting.

2.7 78 homes a year (1,248 homes in total between 2020 and 2036) are

² includes commitments to 36, allocations in adopted and (for Charnwood and Leicester) emerging plans and allowance for windfall

³ positive number = to find & negative number means currently overprovided

distributed to Charnwood. This increases the housing requirement to 1,189 homes a year or 19,024 homes in total between 2020 and 2036.

2.8 The SOCG records overall supply of 20,874 homes in Charnwood between 2020 and 2036. However, it should be noted that the plan period for the Charnwood Local Plan is 2021 to 2037. At a very basic level the supply exceeds the housing requirement (local housing need + portion of unmet need) for Charnwood by 1,850 homes meaning in principle at least the Charnwood Local Plan accords with Paragraph 35 of the Framework which says that plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

2.9 In our view, the preparation of the SOCG and its agreement by the HMA authorities (with the exception of Hinckley and Bosworth who are not under examination here or being tested under the Duty to Cooperate) is a substantial milestone and evidence to demonstrate that, during the preparation of the Plan, the Council has engaged constructively, actively and on an on-going basis with relevant authorities and prescribed bodies on relevant strategic matters. In this respect the Duty to Cooperate has been met in a manner consistent with paragraphs 24 - 27 of the Framework.

2.10 Strategic policies should look ahead over a minimum 15 year period from adoption (Paragraph 22 of the Framework). The Charnwood Local Plan has a plan period that runs to 2037 (15 years) but the SOCG runs only to 2036 (14 years). Whilst this Matter statement concerns itself with the

Duty to Cooperate rather than matters of soundness it might be noted that the 1,850 homes headroom (see paragraph 2.8 of this statement) is sufficient to meet a further year of Charnwood's own local housing need (1,111 homes) as well as the 78 homes distributed as unmet need from Leicester should that unmet need be assumed to continue in the same manner for a further year beyond the SOCG.

- 2.11 The SOCG identifies unmet need to 2036 and the amount of housing required at a HMA level and the question of whether there is unmet need beyond 2036 are matters for a future Statement of Common Ground. In this respect, the Charnwood Local Plan has not only met the Duty to Cooperate, but also provides for unmet needs that cannot be met within neighbouring areas in accordance with Paragraph 11b of the Framework as no unmet need is expressed beyond 2037.