

1. Background

- 1.1. This hearing statement has been prepared on behalf of Redrow Homes East Midlands (“Redrow Homes”).
- 1.2. Redrow Homes are working in partnership with owners of the land off Ratcliffe Road, Sileby, which is not identified for development in the submitted version of in the Charnwood Local Plan.

2. Issue 1 - Whether the Council has complied with the Duty to Cooperate in the preparation of the Plan

Q. 1.1 What are the relevant cross boundary strategic matters that have arisen through the preparation of the Plan (defined as matters having a significant impact on at least two planning areas¹)?

- 2.1. The apportionment of unmet need from Leicester City has had the most bearing on Charnwood Borough and the other six non-metropolitan authorities. The impacts of this are discussed in greater detail in the remainder of this statement.

Q. 1.4 When will the Statement of Common Ground on Housing and Employment Need (SCG-1) be updated to apportion the unmet need for housing and employment from Leicester to 2036?

- 2.2. The Statement of Common Ground for Leicester’s unmet need has been published on the 13th May 2022 with an apportionment of an additional 78 dwellings per annum and a total of 1,248 dwellings for Charnwood Borough across the plan period proposed in order to meet a portion of Leicester’s unmet need. It remains to be seen whether this figure is robustly justified, though it appears somewhat low given the spatial relationship of Charnwood to Leicester City, and whether the published figures will be agreed by all of the Leicester and Leicestershire authorities.
- 2.3. At the time of preparing this hearing statement we have yet to see the latest draft Statement of Common Ground submitted by Charnwood Borough Council as an Examination Document but hope that this will be done.
- 2.4. The first authorities (Blaby District and North West Leicestershire District) have commenced reporting on the unmet needs and draft Statement of Common Ground. Other authorities have indicated that they will be taking the draft Statement of Common Ground on unmet need to committees beyond May 2022 with some not until Autumn 2022.
- 2.5. One authority, being Hinckley and Bosworth has indicated concerns with the approach in the draft Statement of Common Ground.

- 2.6. Given the timing of the release of figures to meet the unmet need and subject to the agreement of the April 2022 Statement of Common Ground by all of the respective authorities and especially that by Charnwood it is necessary for this submitted Local Plan to incorporate the proposed unmet need now within Charnwood Borough, through consideration of main modifications rather than leave the matter for review under Policy DS2 post-adoption of the submitted Local Plan (see 2.9 below).

Q. 1.5 What liaison has taken place between the Leicester and Leicestershire authorities to address the unmet need for housing and employment since the announcement of the cities and urban centers uplift in December 2020? Where is this documented?

- 2.7. We consider this is a question for the Council to comment on, noting the draft Statement of Common Ground on unmet need from Leicester City.

Q. 1.7 If the outcome of cooperation on the Statement of Common Ground is that none of the unmet housing need will be apportioned to Charnwood, would there be any implications for the Plan or for Policy DS2?

- 2.8. The draft Statement of Common Ground does include apportionment to Charnwood Borough and this is a matter that should be included within the local plan through main modifications.

- 2.9. Policy DS2 is not an effective mechanism to address the unmet needs for reasons we have set out in our Regulation 19 representations. We consider Policy DS2 should be taken out of the local plan, which itself should be the subject of main modifications to address the unmet needs including additional site selections.

Q. 1.8 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 out in Policy DS1 represent a robust and appropriate approach for the distribution of further housing, employment and other development in the longer term?

- 2.10. The apportionment of unmet need from Leicester City to Charnwood would have to be added to the figures contained within Policy DS1 – further uplifting the level of proposed development to be split across the settlement hierarchy from the proposed figure of 19,461 to 20,709 as a minimum.

- 2.11. This unmet need could have a spatial emphasis on locations proximate to and well-connected to Leicester City, which is where the unmet needs arises from. A focus of this should include Service Centres well connected to Leicester City such as Sileby. DS1 has not been drafted specifically to do this and it is not therefore an appropriate approach for distribution of these homes.

Q. 1.10 Will Policy DS2 be effective in its submitted form and are any main modifications necessary to improve its clarity in relation to timescales and its effectiveness? Should the policy include a reference to strategic warehousing and distribution needs

Charnwood Local Plan Examination

Matter 1 – Duty to cooperate and other legal requirements

Redrow Homes Limited
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- 2.12. We consider that DS2 is not is positively prepared and it is not effective, especially given the issuing of the updated SoCG, which details the unmet need apportionment during the examination period.
- 2.13. Were the adoption the Local Plan to naturally progress to the end of 2022 or beginning of 2023, then DS2 will not force a review much before or possibly even later than the legal requirement of five years as set out under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.14. We consider that Policy DS2 should be taken out of the Local Plan on the basis of a review of the proposed housing need now to take into account the unmet need of Leicester City.