

Charnwood Local Plan Examination

Supplementary Hearing Statement on behalf of Jelson Homes

Matter 4: Assessment of housing need, the housing requirement and mix and choice of housing (Updates and Answers to Supplementary Questions)

January 2023

Report Title: Charnwood Local Plan Examination – Supplementary Hearing Statement – Matter 4 (Updates and SQs)

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For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 Jelson's original Matter 4 Hearing Statement provided answers to Questions 4.1, 4.3, 4.9 and 4.14. We provide very brief updates to our answers to Questions 4.1 and 4.3 below, noting the impact that the Inspectors' initial findings have on these matters. This Statement also provides short answers to Supplementary Questions 1 and 2.

1.2 Jelson relies on its original Matter 4 Statement for the purposes of Questions 4.9 and 4.14.

2. Q4.1: Is basing the assessment of housing need on the Local Housing Need figure in the standard method robust and is the housing requirement of 17,776 dwellings in Policy DS1 justified? What evidence supports this approach and should any upward adjustments be made for economic growth or to support the delivery of affordable housing?

2.1 Jelson considers it robust to base the Borough's assessment of housing need on the Local Housing Need figure derived from the standard method. This appears to be common ground amongst participants. The starting point is, therefore, 1,111 dwellings per annum. However, the housing requirement is not 17,776. This is because:

- a) an adjustment needs to be made to the standard method calculation to take account of the latest affordability ratio. The Council is already doing this for development control purposes and we see no reason, particularly given that other amendments must now be made to the housing requirement, why the baseline figure should not now be adjusted to ensure that it is as up to date as possible. The adjustment for the latest affordability ratio takes the starting point to 1,160 dpa;
- b) the Inspectors have concluded that Charnwood should deliver a proportion of the housing that Leicester City Council is not going to be able to provide. This amounts to an additional 78 dwellings per annum (from 2020 – so for the Plan period plus a year);
- c) as noted in our January 2023 Matter 1 Statement, it is necessary for soundness for the plan period to be adjusted so that it extends from 2021 to 2039. This means adding two years' worth of housing need to the requirement specified in Policy DS1; and
- d) as the Council rightly notes in paragraph 2.14 and Table 2 of the submitted Plan, it is necessary to allow for unforeseen circumstances and the Council proposes to do this by providing for at least 10% more homes than the basic need calculation indicates.

2.2 The result of these various adjustments is a housing requirement amounting to 22,326, or 24,599¹ with a 10% buffer included.

3. Q4.3: Will the proposed supply of 19,461 dwellings set out in Policy DS1 against a requirement of 17,776 dwellings incorporate a sufficient 'buffer' to allow for non-delivery as well as providing choice and flexibility in the supply of housing land?

3.1 No. As the Inspectors have indicated might be the case, the Plan must provide for more than 19,461 homes in order to satisfy the Borough's need for housing. In addition, provision will also need to be made for a buffer to account for changes in circumstances.

¹ $(1160 + 78) \times 18 + 78 = 22,326 + 10\% = 24,599$

4. **SQ1: In the light of the Inspectors' findings (Exam 55) that the minimum local housing need for Charnwood is 1,189 dwellings per year, should the housing requirement in Policy DS1 of 1,111 dwellings per year be increased to 1,189 to ensure that the Plan has been positively prepared? Is there any justification for a lower or a higher figure?**
- 4.1 We do not agree that 1,189 is the correct starting point for the reasons expressed above.
- 4.2 Policy DS1 should be amended to specify the correct housing requirement but this should be expressed as 22,326. The Policy will also need to be amended to quote an updated number of new homes provided for by way of allocations and windfalls.
5. **SQ2: Pending any changes to the housing requirement in Policy DS1 to accommodate Charnwood's apportionment of Leicester's unmet housing need, is there a sufficient buffer between the minimum housing requirement in Policy DS1 and the overall supply during the Plan period to ensure that there is a reasonable prospect of the housing requirement being met? In the event that the supply needs to be increased to secure an appropriate buffer, what sources of supply would help to deliver this?**
- 5.1 No, even if one excluded from the requirement the 1482² homes that are required to be delivered to meet Leicester's needs, this still leaves a need for 20,844 homes and the 19,461 homes that the Plan says it provides for does not even satisfy this, let alone create a buffer to account for changes in circumstances.
- 5.2 The Council suggested during the Matter 10 Session that its current proposed allocations have the capacity to deliver more homes than assumed in the Plan as submitted and probably enough to deal with the increase in housing requirement stemming from taking its share of Leicester's unmet need. We do not believe that this is the case but must reserve judgement until we are given the opportunity to review any revised evidence the Council chooses to produce on housing land supply.
- 5.3 In the more likely event of the Council having to identify additional sites for allocation it has the ability to look to those that were considered for allocation but discounted during the site selection process. Jelson's land at Cotes was one of those sites and we explain in other Statements and our Regulation 19 Representations, the merits of it. In our original Matter 6 Statement, we set out our concerns about the site selection process that the Council has conducted and note, importantly, that Cotes is better performing (against the site selection criteria), and probably substantially better performing, than at least 54 of the sites that are proposed to be allocated. Moreover, the allocation of Cotes, which lies just to the east of Loughborough (very close to the town centre, the train station and the bulk of the Town's employment) would help address the issues with the spatial strategy that we have addressed under Matter 2. There is an extremely strong case for the allocation of Cotes even without an increase in the housing requirement but, with an increase, the case is even more compelling in our view.

² 78 x 18 for the Plan period + 78 for 2020

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