

Land at Six Hills, Charnwood

Hearing Statement Matter 4
Representation Number: 569



Boyer

Report Control

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TABLE OF CONTENTS

1. Introduction	2
2. Response to Matter 4 Consultation Topics	3

1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Knightwood Developments Limited (Representation Number: 569) in regard to the 'Charnwood Local Plan' examination in which the Hearing Sessions are due to recommence.
- 1.2 The below representations provides Knightwood Development's response in relation to Matter 4 – *Assessment of Housing Need, the Housing Requirement, Mix and Choice of Housing*, as set out within the recent Matters, Issues and Questions published by the Inspector on the 5th December 2022, with a particular focus on the assessment of housing need and requirement. As per the Inspector's Guidance Note a separate set of representations will be submitted for each Matter wished to be discussed.
- 1.3 These representations are a continuation of the promotion of Knightwood Development's land interest at Land located at Six Hills, Charnwood, Leicestershire.
- 1.4 Paragraph 35 of the NPPF provides the criteria by which emerging Local Plans are found to be 'sound' when subjected to examination; namely that the Local Plan must be positively prepared, justified, effective and consistent with national policy. Our representations are grounded in directing the emerging Local Plan towards those options for housing and economic growth that will result in the emerging Local Plan being found sound, in this regard. It is contended that the options that are not supported in these representations would risk the emerging Local Plan being found unsound, for reasons detailed below.

2. RESPONSE TO MATTER 4 CONSULTATION TOPICS

MATTER 4 – ASSESSMENT OF HOUSING NEED, THE HOUSING REQUIREMENT AND MIX AND CHOICE OF HOUSING

Issue 1: Is the assessment of housing need and the housing requirement positively prepared, justified by the evidence and consistent with national policy?

4.1 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 The Standard Method (using the 2014 baseline data) has been used to define an annual housing figure of 1,111 dwellings for the Borough of Charnwood. This figure equates to Policy DS1's requirement of 17,776 dwellings across the entire plan period, from 2021 to 2037. Within the Leicester & Leicestershire Housing & Economic Needs Assessment (HENA) Housing Distribution Paper (Exam 45) it shows the figure used to calculate this is generated from the 2021 data set, comparative to the 2022 data which was used for wider Leicestershire Housing Market Area (HMA) (Exam 45, Chapter 3, Para 3.1 - 3.3, pg. 7).
- 2.2 This is a similar case for the affordability data used, as Charnwood based their housing need on the 2020 data set not the 2021 data.
- 2.3 During the previous hearing sessions which took place surrounding Matter 10 Leicester's unmet housing and employment need, it was felt that the standard method of calculating housing need/requirements (using the 2014 baseline data) does not provide enough homes to meet the economic needs and that the overall need should be higher. It was also felt that more recent affordability data would be more appropriate and help to show worsening affordability conditions.
- 2.4 If the latest 2021 affordability data were to be used this would increase the annual housing need from 1,111 to 1,160. If a modest increase to account for this did not occur this would cause the plan to be unsound and could trigger a review much sooner, which would fail to demonstrate positive and proactive plan making.
- 2.5 Therefore this does not align with Paragraph 35 of the NPPF whereby for Plans to be considered 'sound' they must be positively prepared, justified, effective and consistent with national policy. This is due to the most up to date and robust evidence not being utilised to inform the plan.

- 2.6 Based on the evidence set out within the HENA Housing Distribution Paper (Exam 45) and the matter discussed at the Matter 10 hearing sessions it is felt an upward adjustment to account both for economic growth and the delivery of affordable housing is needed and that Charnwood has the ability and should aspire to cater for a higher housing requirement.

4.3 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?

- 2.7 The proposed supply of 19,461 set out within Policy DS1 should be defined as the baseline housing requirement figure and not as a 'buffer'. This is based on the Inspectors findings (Exam 55, see question below), calling for the minimum local housing need to be increased from 1,111 dwelling per annum to 1,189 dwellings per annum. This increase by the Inspector generates an additional 78 dwellings a year which equates to 1,248 dwellings across the entire plan period.
- 2.8 This increase therefore demonstrates that a revised buffer needs to be developed based on these additional findings in order to properly consider and significantly boost future housing supply. Without revisiting the buffer the Local Plan is not considered to be effective or justified.
- 2.9 By including a buffer in addition to the baseline housing requirement of 19,461 dwellings, the Council will be able to clearly demonstrate that they have prepared a plan which meets national requirements and can react to the changing nature of the housing market and delivery rates across Charnwood and other parts of Leicestershire.
- 2.10 As outlined in our representations prepared in August 2021, the housing delivery rates across Leicester and Leicestershire have clearly shown a rate of under delivery over a sustained period of time. It is accepted that preparing Local Plans is a positive way to address this under delivery, but in our view that is only part of the solution. Ensuring that Local Plans have a wide range of site allocations that are ambitious and have aspirational housing targets which include a sufficient buffer allows for greater flexibility and higher rates of delivery overall.
- 2.11 Although there is no guidance or definition as to what is a sufficient buffer, it is our view that by increasing housing numbers and therefore additional site allocations ensures that Charnwood maintains a plan led approach which secures the necessary infrastructure for the local communities whilst providing the type of dwellings required.

Supplementary Questions:

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?

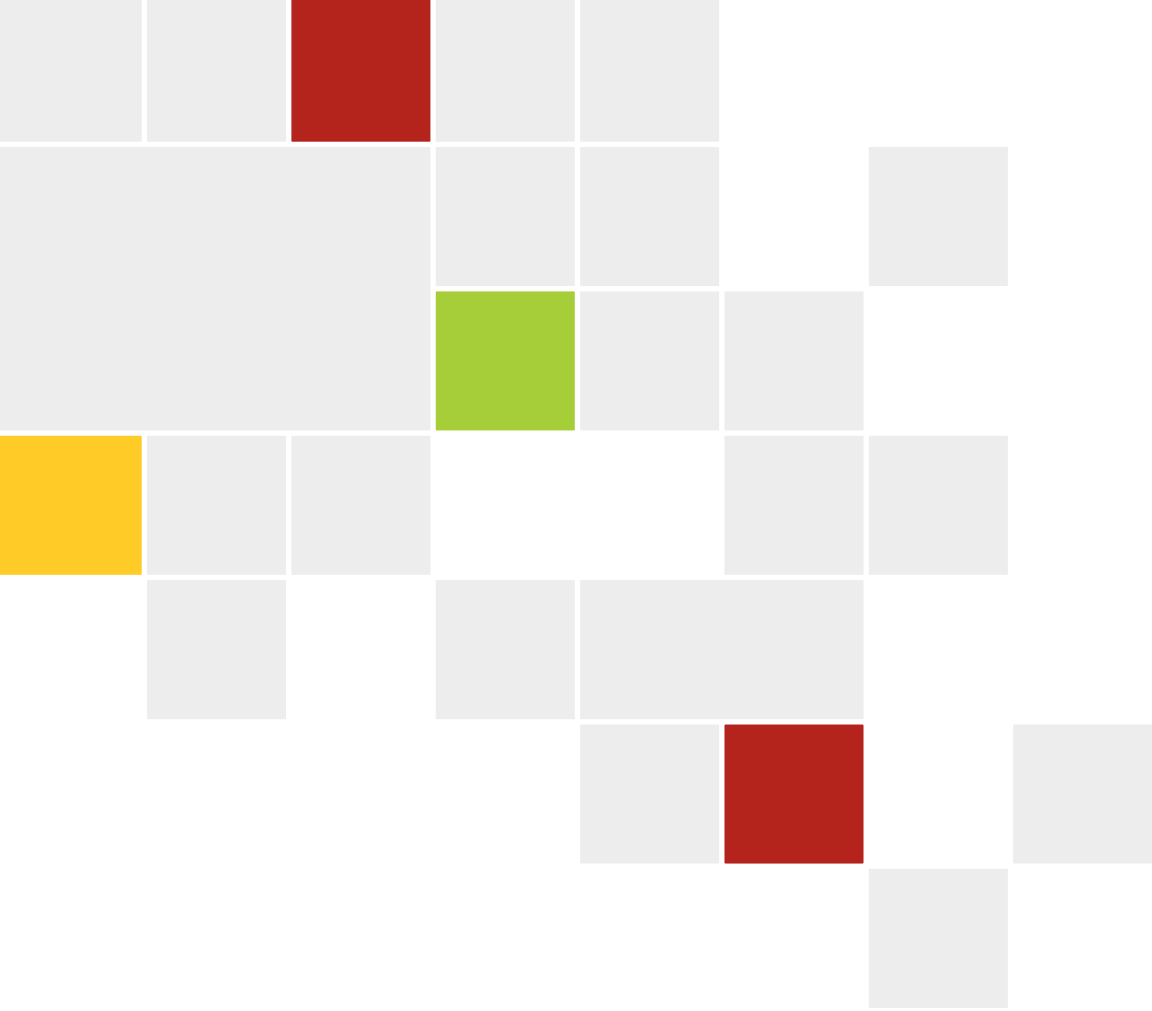
- 2.12 As per the findings reached by the Inspectors and the previous evidence set out above the figure should be increased to 1,189 for consistency.
- 2.13 We consider that the housing requirement in the plan should be increased to a minimum of 1,189 dwelling per year to reflect the housing need in Charnwood and a proportion of the unmet need generated from Leicester and Leicestershire. As noted within the Inspectors Letter from November 2022 (Exam 55) there is still some uncertainty over the level of unmet need (such as that “not agreed by Hinckley and Bosworth Borough Council...”) which raises the potential for an additional 85 dwellings per annum to meet overall need across the Housing Market Area.
- 2.14 By increasing the minimum housing need for Charnwood over the plan period, it will ensure that the Council has an ambitious target on which to strive for and deliver sustainable development during the plan period. An ambitious target will ensure that the housing needs of the Borough and (in part) Leicestershire can be met through a robust range and mix of housing opportunities for all. Increasing numbers also allows for greater flexibility and choice in the market which will be able to respond to needs over the plan period. Charnwood like many other areas will need to address the social challenges facing the country in terms of cost of living, record inflation levels and recovery from the Covid pandemic. Ensuring that sufficient dwellings in a variety of locations can be brought forward over the plan period will be key to meeting the needs over the plan period.
- 2.15 In our view, the housing numbers across Leicester and Leicestershire should be increased more to ensure over provision. The local authorities should be commended for their long established partnership working to address housing need, but cross boundary relationships can often be sensitive and be undermined through a change of political administration or national directives (such as Nutrient Neutrality) that may “limit” or “delay” housing delivery across Leicestershire.
- 2.16 By choosing an aspirational housing target, the local plan will be able to ensure delivery of dwellings that meet needs as well as delivering the regeneration, economic and infrastructure needs identified within the plan. It will also enable deliverable and developable sites to come forward without delay.

Supplementary Questions:

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? Are any new site allocations likely to be required? If so, what would be the process and likely timescale for identifying sites?

- 2.17 Due to the gap identified between the minimum housing requirement (17,776) and overall supply during the plan period (19,461) there is a difference of 1,685 dwellings. It has already been expressed the desire to increase the annual target from 1,111 to 1,189 however it is not clear if this takes into account the more recent and up to date affordability data.
- 2.18 As per Policy DS3: Housing Allocations within the Pre-Submission Draft Charnwood Local Plan (2021-2037), there is currently enough sites allocated to deliver 8,858 dwellings over the plan period however there is a clear need for further sites to come forward to help bridge this gap.
- 2.19 The site at Six Hills is already a suitably identified site with a logical timescale for delivery. It would enable the higher housing target figure to be reached and meet the wider objectives of the borough.
- 2.20 Within the 2020 SHELAA the Land at Six Hills (PSH486) has been identified as having the ability to deliver 500 homes in the next 11 – 15 years, with a full dwelling capacity of 3450 across the lifespan of the site (part delivery in a future plan period, post 2037).
- 2.21 The site is available for development and has no irresolvable physical/environmental constraints to deal with it is viewed as being an attractive market for development.
- 2.22 Within Exam 47a the Statement of Common Ground (SoCG) Sustainability Appraisal Report (SA), a number of Distribution Options are proposed, Option 3 has a focus on strategic sites, which includes the site at Six Hills. If development were to be placed at the strategic sites across the HMA, particularly that at Six Hills, there is a comparatively unconstrained nature and an existing strong community network exists between the Borough and the City of Leicester. Displaying how the site is sustainable as has the infrastructure to support development rather than it being placed on those with a weaker road network and facility base.
- 2.23 Six Hills provides a long term opportunity for Charnwood and the Leicestershire authorities to focus on a new settlement which is not dependent on extensions to existing urban areas or market towns which appear in the existing settlement hierarchy. As outlined above, by increasing the housing numbers the Council will need to identify additional sites to deliver the housing requirement and maintain housing delivery over the plan period.

- 2.24 We consider that the time for identifying additional sites to meet unmet housing need across Leicester and Leicestershire is now and in the Local Plans which are emerging. The Local Plan process provides opportunity for the local authorities to address the unmet need they have identified and agreed upon. It would not be appropriate to integrate an “early review” mechanism when the circumstances which would trigger an early review are already known and established.
- 2.25 Increasing the housing target and identifying additional sites to meet needs (such as Six Hills) may have a short-term delay (due to a need for further consultation and engagement) but would then provide the confidence and policy framework for Charnwood and its neighbouring authorities across Leicestershire to implement their plan(s). As outlined in our August 2021 representations, by ignoring the requirement to plan for more homes, the Charnwood Local Plan will almost immediately become out of date which is contrary to the Government advice and is counter intuitive.



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