

CHARNWOOD LOCAL PLAN EXAMINATION

Matter 4: Assessment of Housing Need, the Housing Requirement and Mix and Choice of Housing

Additional Submission from CPRE Leicestershire

January 2023

Representation Number: 340

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

Supplementary Questions

Question 1.

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?

CPRE's view is that the overall figure should be lower.

In our June 2020 submission on Matter 4 in answer to Question 4.1, we argued that the 1,111 dwellings per year figure should be lower and excess housing reduced. The addition of 78 dwellings per year does not alter our view with regard to the 1,111 figure.

To summarise, our concerns about this figure arose from:

1. The use of a 10% contingency (flexibility addition) on all sites. While accepting a small buffer was appropriate, we cited the example of the Black Country where a 5% failure rate was employed.
2. The Plan made no allowance for windfalls (1,120 dwellings plus).

3. Not including all the permitted allocation all of the North Leicester Urban Extension (1,295 dwellings).

Since the Inspectors reported their conclusions regarding the Matter 10 hearings, the Government, through the Secretary of State for Levelling up Housing and Communities, Michael Gove, has announced a range of proposed changes to the planning system based on his 5 December 2022 letter to MPs.

In particular:

- i) he made clear that the calculation of housing numbers should no longer be considered mandatory, but that it should be an advisory starting point. Also, it will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area.
- ii) he would promote a brownfield first approach and in relation to cities said: *“As the Prime Minister committed to in the summer, we will also continue to get cities building more new houses, and stop them offloading their responsibilities to provide new housing onto neighbouring green fields by ending the so-called ‘duty to co-operate’ which has made it easier for urban authorities to impose their housing on suburban and rural communities.”*¹
- iii) he would consult on a new approach to accelerating the speed at which permissions are built out, specifically on a new financial penalty.

This would mean that the 35% increase to housing in Leicester should not be included in any unmet need calculation, as we said at the previous hearings, reducing Leicester’s SM need by 627 dpa (2021 Affordability Figures) which from 2020-2036 amounts to 10,032. This would mean that the additional 78 dpa in Charnwood should, in effect, be considered as excess contingency provision reducing the need for further contingency housing to be added.

Question 2.

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

¹ Department for Levelling Up, Housing & Communities, Letter from Secretary of State to MPs, 5 December 2022, p. 4.

In CPRE's view, even with the increase in the annual need figure to 1189, there will still be sufficient buffer (flexibility) between minimum housing requirement and the overall supply during the Plan period. In addition, we do not see a need to make any new site allocations.

This is based upon taking account of two factors. The Plan currently gives no weight in calculating the requirements to windfalls and does not anticipate a full build out of the North East Leicester Urban Extension (Thorpebury development) within the Plan period. Not including these contributions to the overall numbers could result in excess requirements and in an oversupply of housing through the unnecessary allocation of additional greenfield sites for development.

The Leicester/ Leicestershire Statement of Common Ground June 2022 (Exam 43)² assumes 640 windfalls in Charnwood by 2031 or 1040 by 2036 averaging at 80 dpa. However the Plan goes to 2037, so a figure of 1120 would be appropriate.

In our view, the long timescale for delivering the NE Leicester – Thorpebury development is over-conservative and unacceptable. Given the Government's commitment to strengthen its powers to ensure developers to deliver houses at a quicker build out rate, there should be greater weight given in the Plan to the completion of this development within the Plan period even while all the details are not yet published. The wider site has an allocation of 4,500 homes but only 3,205 homes are included in Table 1 (p. 20)³ Housing Need and Supply 2021-37. This leaves 1,295 which in our view should be included in the Plan.

Taking the extra Leicester Housing need and these two factors into account, we think that there would still be an oversupply of 1,000+ houses.

Our Calculations:

Need/Requirement: 20,926

(with extra Leicester Housing $1189 \times 16 = 19024$ plus 10%, contingency = 20,926)

Supply: 19,461

(Supply Total from Table 1: 10,603, plus 8,858, total from Policy DS3 in Plan p. 35⁴) = 19,461

Additional supply as per our suggestions above: 2,415+

(Windfalls 1,120 and 1295 from NE Leicester Urban extension)

Total Supply: 21,876+

² Exam 43 Statement of Common Ground relating to Housing and Employment Land Needs (June 2022) Appendix A and Appendix B

³ Charnwood Plan, Table 1, on page 20.

⁴ Charnwood Plan Policy DS3 table p 35

Overall position:

Need (including 10% contingency): 20,926

Supply: 21, 876+

This represents a 15% or 950 above the 10% contingency

All this suggests to us that there is an oversupply of 1000+, even with the extra for Leicester. Therefore, by including windfalls and full build out of the NE Leicester site, there will be a more than sufficient buffer and no need to allocate further sites.

It may even be that some of the currently allocated sites, which have high impacts on the environment, landscape or other issues of sustainability, can be safely removed from the plan should the evidence on those sites merit it without jeopardising the delivery of sufficient housing. This is especially so as some sites not previously allocated have now received planning permission.