

For and on behalf of
Gloebal Ltd

**Charnwood Local Plan
Examination in Public
Supplementary Matters, Issues & Questions
Matter 4: Assessment of Housing Need, the Housing Requirement and
Mix and Choice of Housing**

**Land at Oakley Road (HA33) and
Land North of Hallamford Road and West of Shepshed (HA35)**

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1.0 INTRODUCTION

- 1.1 This response to the supplementary questions relating to Matter 4 in respect of the Charnwood Local Plan (CLP) 2021-37 Examination has been prepared by the Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd. SPRU have been instructed to appear at the Examination on behalf of Gloeбал Ltd.
- 1.2 SPRU have made submissions on behalf of Gloeбал Ltd to the Regulation 19 consultation (July – August 2021) on the emerging Local Plan. This statement should be read in conjunction with these submissions (representation numbers PSLP/562 and PSLP/563).
- 1.3 DLP prepared written submissions and appeared on behalf of Gloeбал Ltd and other clients in respect of Matter 10 (Unmet Housing Needs). This Statement addresses relevant supplementary questions relating to the overall assessment of housing need and implications for the housing requirement arising from these previous objections.
- 1.4 These earlier submissions set out that the allocation of sites HA33 (Land at Oakley Road) and HA35 (Land North of Hallamford Road and West of Shepshed) is supported and that the allocation of the sites for residential development is sound. Details of both sites are contained within Statements of Common Ground agreed with the Council in EXAM49 and EXAM50 respectively.
- 1.5 The evidence highlights that the sites are being actively promoted and are progressing towards the submission of planning applications. Supporting work to facilitate bringing forward the abovementioned sites, including the preparation of indicative masterplans, further demonstrates that the allocation of the land in question, including an increase to the capacities for development proposed in the submission version Plan, would be justified and effective and that development would be deliverable and developable in the early years of the plan period following adoption.
- 1.6 In addition, the sites would constitute a well related and logical extension to the urban area (as well as the other proposed allocations and previously constructed developments along the north western side of Shepshed) in a sustainable location, supporting and offering prospective residents good access to public transport, education, employment and other local facilities and services. The sites are therefore well placed to encourage more sustainable patterns of travel and reduced reliance on the private car, consistent with the principles for sustainable development set out in the NPPF.

2.0 ISSUE 1 - IS THE ASSESSMENT OF HOUSING NEED AND THE HOUSING REQUIREMENT POSITIVELY PREPARED, JUSTIFIED BY THE EVIDENCE AND CONSISTENT WITH NATIONAL POLICY?

1. In 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?

- 2.1 Given the Inspectors' judgement on minimum local housing need and the necessity to address unmet housing needs from Leicester that exist *now*, it is critical that the housing requirement, as outlined in Policy DS1, is modified and increased. On behalf of our client, we continue to assert that a higher figure to ensure provision of a minimum of 1,234 houses per year is justified for the reasons set out below. Gloeal Ltd has previously asserted that declining affordability since submission of the Plan should be reflected in provision to reflect its impact upon increase in the calculation of local housing need alongside reinforcing the justification for provision towards Leicester's unmet needs.
- 2.2 Failure to increase the requirement to incorporate the apportioned unmet need will result in supply being measured against an artificially low requirement that fails to ensure the delivery of housing to meet the unmet needs of Leicester. The effect of this could arguably be to simply exacerbate the urgent housing needs of Leicester.
- 2.3 As stated in our thorough Matter 10 Statement (paragraph 2.18) Charnwood's minimum dwelling need should be adjusted from 1,111 dpa to 1,156 dpa in order to reflect the most recent LHN calculation based on the most recent affordability ratio. As a result, the 1,189 dpa value should be raised to a minimum of 1,234 dpa (1,156 + 78).
- 2.4 Applying the relevant 2021 affordability ratio would raise the assessment of local housing need by 45 dpa. This represents over half of the extra houses suggested by EXAM45 to meet Charnwood's portion of Leicester's unmet needs and is a sound and justified response to addressing limitations and constraints in the methodology for apportioning these needs. This is reinforced by the uncertainty that the remainder of Leicester's unmet needs will be met in full by other neighbouring authorities (with weaker functional relationships) given their own plan-making timescales.
- 2.5 Our client maintains an objection to limitations on the methodology related to capping the compound dwelling growth rate at 1.4% for the apportionment of unmet needs. This is not supported by the evidence of the Council's own trajectory in terms of the expected rate of housing delivery or details of potential supply in terms of the flexibility and choice of suitable sites could be provided to support the trajectory. In other words, this aspect of the methodology is specifically not a constraint upon addressing a higher level of housing need locally to reflect worsening affordability – equivalent to +45dpa – alongside the justification for provision for Leicester's unmet needs.
- 2.6 The soundly based principles of the development strategy support addressing increased pressure upon housing need within the Plan's provision for housing within the five years upon adoption and pending future review. The potential increase to the sustainable capacity for development upon both sites HA33 and HA35 as proposed within the submission version Plan is illustrative of this.
- 2.7 It is critical to recognise that if an unmet need in Leicester cannot be supplied within the city, it should be met through a method that allows people to live near the services on which they rely, making travel patterns more sustainable. The rationale behind this technique is to ensure that new dwellings can take advantage of existing infrastructure such as public

transportation, schools, medical facilities, and shopping centres.

- 2.8 Shortcomings within the approach in EXAM45 (equivalent to +78dpa provision for unmet needs) impose constraints upon redistribution that should be based on the functional link between the neighbouring councils and Leicester. This remains contrary to the guidance but also unlikely to achieve the policy outcomes of increasing the supply of housing for the residents of Leicester (and those affected by associated worsening affordability in Charnwood) in terms of proximity to services and sustainable travel patterns.
- 2.9 Provision for a higher level of local housing need to reflect worsening affordability as part of the proposed strategy as submitted, including further homes at Shepshed, is entirely consistent with these objectives and those of supporting sustainable development and a boost to overall supply.

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

- 2.10 The proposed Local Plan has a 10% flexibility provision (1,778 dwellings) to provide for unforeseen changes that may jeopardise site delivery (SD-2, paragraph 2.14). This would equate to ensuring the provision for 19,554 units (SD-2, Table 2) relative to the requirement proposed in the submission version Plan. However, the development strategy contained in Policy DS1 intends for only 19,461 dwellings to be built (SD-2, Table 5). As a result, the Local Plan may fall 93 houses short of the desired provision for a 10% buffer against housing requirements.
- 2.11 Furthermore, as previously stated, we feel that Policy DS1 should include a minimum dwelling requirement of 19,744 (16 years) and increased to 20,978 to ensure provision for Plan Period to 2038. Provision in the submission version Local Plan is therefore insufficient to address the housing requirement once subject to appropriate modifications.
- 2.12 As a result, we believe that enough land should be found to support a minimum of 21,718 houses (to 2037) and 23,076 to 2038. This includes Charnwood's most recent LHN need of 1,156, as well as Leicester's unmet housing need and a 10% buffer deemed acceptable by the Council.
- 2.13 As a result, there would be a shortfall of 2,257 houses compared to the provision set out in Policy DS1 (19,461) based on the total to 2037.
- 2.14 Additional capacity and potentially additional new sites will therefore be required. Pending discussion at the Matter 7 session our client has previously submitted that the buffer in provision relative to the requirement in the Plan as submitted would not provide flexibility and choice upon adoption due to the reliance on large strategic sites as a substantial proportion of the 'buffer'.
- 2.15 As such the starting point to address the shortfall against the housing requirement as proposed to be modified is part of the same solution to lack of flexibility. The Council should seek to maximise the development yield on allocated sites, ensuring that the best use of land, at appropriate densities, maximises supply.

- 2.16 An updated trajectory, including information of any changes in site capacities, should come before this to help the Council and Inspectors evaluate how much more land is needed for development and whether the characteristics of supply (as modified) might enable adoption of an effective Plan with any buffer below 10%. We submit such circumstances would only be sound subject to modifications that fully reflect the increased potential for housing upon sites HA33 and HA35 as currently proposed.



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