

Charnwood Local Plan Examination

Matter 4: ASSESSMENT OF HOUSING NEED, THE HOUSING REQUIREMENT AND MIX AND CHOICE OF HOUSING

Barkby Road, Queniborough

Prepared by Fisher German LLP on behalf of David Wilson
Homes East Midlands

Project Title

Land at Barkby Road, Queniborough

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1. Introduction

1.1 This Supplementary Hearing Statement has been prepared on behalf of David Wilson Homes East Midlands in respect of their land interests at Barkby Road, Queniborough. This site is an omission site in the emerging Charnwood Local Plan. The site is considered suitable for allocation in the scenario further housing sites are required to enable the Local Plan to be found sound (as we consider to be the case within representations and statements). These statements should be read in conjunction with our Regulation 19 submissions and initial examination Hearing Statements.



Figure 1: Barkby Road, Queniborough, Site Location Plan

1.2 The Barkby Road site is located to the southern edge of Queniborough. The adopted Core Strategy identifies Queniborough as one of Charnwood’s 12 ‘Other Settlements’ which are acknowledged to be sustainable settlements, located approximately 9km to the northeast of the centre of Leicester, just south of the A607. The existing facilities and services in Queniborough, and nearby Syston, are within walking distance of the application site.

1.3 David Wilson Homes are a respected national housebuilder who deliver high quality new residential development and who have a strong track record of delivery in the local area. The Company is proud to have been awarded the Home Builders Federation (HBF) 5 Star Home Builder status for thirteen consecutive years. This accolade demonstrates the quality of both our client’s product and service; awarded only to housebuilders who receive a higher than 90% recommendation by their customers.

2. Matter 4: ASSESSMENT OF HOUSING NEED, THE HOUSING REQUIREMENT AND MIX AND CHOICE OF HOUSING

Supplementary Questions

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?

- 2.1 Yes, assuming the findings of Exam 55 are correct, and notwithstanding our concerns that there is significant justification for a higher housing requirement in Charnwood when considered independently, and also that the evidence supports that Charnwood should be seeking to deliver a higher quantum of growth from Leicester City, 1,189 dwellings is clearly more appropriate than 1,111 dwellings. We refer back to our initial Hearing Statements and Matters Statements that provide clear and compelling justification for a higher housing requirement and for brevity will not repeat those here.
- 2.2 Paragraph 11 b of the NPPF states for plan-making (our emphasis);
"strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless..."
this would impact areas specifically protected by paragraph 7 of the Framework 11 b(i) or *"any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole"* 11 b(ii).
- 2.3 It is clear therefore that both Charnwood's own OAN (as derived from the Standard Method in accordance with national policy) and that Charnwood's proportion of Leicester City's unmet need must be provided for in strategic policies, which logically must include the adopted housing requirement and the Council's proposed housing allocations.
- 2.4 It is not considered either of the two listed exclusions of paragraph 11b would reasonably apply. Charnwood is not overly impacted by areas which are impacted by footnote 7 and would indicate that 11 b(i) would apply. In relation to 11 b(ii), there has been no evidence provided by the Council that this is the case (and they have accepted that Charnwood can absorb additional growth through admissions at the Hearing sessions). Moreover, 11 b(ii) must also be considered in its proper context, that it is a planning balance exercise tilted heavily towards the provision of meeting

housing needs (including unmet needs) in full, with significant justification required to support an alternative approach.

- 2.5 In the above context and having regard for the Council's admission that it is now right and proper that they seek to meet Leicester City's unmet housing needs in full as part of this Plan (as apportioned to Charnwood through the SoCG), the housing requirement has to be at the very minimum 1,189 dwellings. Although, as set out previously we refer back to previous submissions and representations and the compelling justification for increased housing growth beyond this level.

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?

- 2.6 Assuming the above is correct, the submitted Plan does not provide sufficient buffer between the minimum housing requirement; and having regard for ongoing reliance on strategic sites which have historically underdelivered in Charnwood, there isn't a reasonable prospect of the housing requirement being met.
- 2.7 The submitted Plan is based on a housing requirement of 17,776 dwellings, between 2021 and 2037, with allocations and alleged existing supply of 19,461 dwellings, equating to a buffer of under 10%. This is already insufficient in our view, particularly having regard for historic failures to deliver sites since the Core Strategy, with current supply largely made up of speculative approvals on developable sites, not the Council's extent allocations. Updating the housing requirement to 1,189 dwellings reduces this buffer to circa 2%. With no lapse rate, this essentially means Charnwood would be fully reliant on every site delivering as anticipated, a scenario clearly not likely to occur and almost certainly leading to the housing requirement not being met.
- 2.8 In the above context, additional supply is required. The Council have set out this is likely to be achievable through increased capacity on current submission allocations. This approach is not supported, as the impact on matters such as design and local services and facilities has not been fully explored and significant evidence, including SA testing will be required to justify any approach

to be recommended as Main Modifications. It is noted that this Examination is yet to critically examine Charnwood's allocations and that process may result in sites having their capacity reduced or the allocation deleted entirely. Given Charnwood's development approach has been specifically designed around matters such as local education capacity (Development Strategy and Site Selection TP/2), it is incorrect to simply say that allocations can now simply absorb additional growth, when this has yet to be fully demonstrated.

2.9 We maintain our position that new sites are likely to be required, albeit the Council will be best placed to confirm the timescales as they will be in contact with the subconsultant teams which will need to update and produce documents such as site-specific evidence, strategic highway modelling, education studies and importantly a robust SA which considers all reasonable alternatives. Any new strategy should also be subject to public consultation, given it fundamentally changes the Plan from the Regulation 19 consultation and the public have a right to comment on this. It would be procedurally unfair to not allow fair and proper opportunity for parties to comment. Moreover, changes to the Plan may now impact parties who previously did not comment.

2.10 We consider it prudent to conduct hearing sessions on proposed allocations prior to the identification and allocation of new sites. As set out above there remains a chance that current allocations, or their supporting delivery assumptions, may be found unsound which may increase the number of new allocations that are required. Failure to undertake this task in this sequence could result in further delays as additional consultations would be required for any additional sites.