



Charnwood Borough Council
Local Plan Examination

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

Supplementary Hearing Statement

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MATTER 4: ASSESSMENT OF HOUSING NEED, THE HOUSING REQUIREMENT AND MIX AND CHOICE OF HOUSING (SUPPLEMENTARY QUESTIONS)

Introduction

- 1.1.1 This hearing statement is submitted by Gladman Developments Ltd (Gladman) in response to the supplementary Matters, Issues and Questions stemming from the Inspectors consideration of Leicester and Leicestershire's Housing and Employment Unmet Needs and Matter 10 hearing sessions.
- 1.1.2 This updated statement in respect of the supplementary Matter 4 questions should be read alongside our initial Matter 4 Statement and Matter 10 Statement.

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

Supplementary 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?

- 1.1.3 Gladman agree that the minimum local housing need for Charnwood now stands at 1,189dpa. It is important to recognise that this figure still represents the starting point as a minimum number of homes needed for the Borough rather than a cap. It is critical that the housing needs of Charnwood are not under-estimated and the final housing requirement for the Plan will need to take account of local circumstances to Charnwood.
- 1.1.4 As detailed previously in both our Matter 4 and Matter 10 Statements, Gladman contend there is justification, in the context of acute affordable housing needs and worsening affordability, for the Council to provide a modest uplift to the minimum housing requirement to ensure sufficient affordable houses come forward.

- 1.1.5 Both the Housing Needs Assessment (EB/HSG/1) and Housing & Economic Needs Assessment (EXAM 14) clearly demonstrate a worsening of the affordability in the Borough. The Housing Needs Assessment details a need for 476 affordable rented homes each year in the Borough¹ and the HENA details² a net need for 455 affordable rented homes each year. Both assessments of need are equivalent to approximately 40% of the minimum LHN of 1,189dpa.
- 1.1.6 It is our understanding that the Council have not confirmed how many affordable homes it expects to deliver through this Plan. If the Council cannot meet the identified need for affordable housing, then they must, as set out in paragraph 2a-024 of PPG, consider whether the total amount of housing delivered through this Plan should be increased to help deliver the required number of affordable homes.
- 1.1.7 In summary, Gladman consider that for the Plan to be positively prepared an uplift in the overall housing requirement above the minimum LHN of 1,189dpa may be justified, to boost the delivery of much needed affordable housing.

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

- 1.1.8 Policy DS1 of the submission Plan (SD/2) currently details an overall housing land supply of 19,461 dwellings. This figure has since been superseded by EXAM 11 which details an overall housing land supply of 19,464 dwellings.

¹ Housing Needs Assessment 2020. Figure 3: Estimated Need for Social/Affordable Rented Housing by sub-area (per annum). (EB/HSG/1)

² HENA 2022. Table 9.40 Estimated annual need for affordable housing split between rented and affordable home ownership. (EXAM 14).

- 1.1.9 As a result of more recent monitoring data, greater capacity being realised on proposed allocations and the outcome of several S.78 appeals in the Borough, Gladman acknowledge that the overall level of supply that is expected to come forward over the plan period has likely increased further.
- 1.1.10 Resultingly, it is necessary for the Council to confirm its most up-to-date position in respect of anticipated housing land supply over the plan period through a realistic and justified housing trajectory. In any event, main modifications will be necessary to update the housing supply figures in Policy DS1 and to ensure consistency.
- 1.1.11 As detailed in our initial Matter 4 Statement, to guard against delivery issues on the allocated strategic sites and correlated housing land supply issues, we consider that the supply buffer should be set at a minimum of 15% of the proposed housing requirement, to take account of these risks and ensure needs are met consistently across the plan period.
- 1.1.12 Clearly the most effective response at this time would be to ensure the Plan provides an appropriate degree of flexibility through the allocations that it makes. In the event the supply needs to be increased to secure an appropriate buffer, Gladman consider that this could be addressed through an early review policy that identifies a number of additional site allocations.