

Charnwood Local Plan Examination

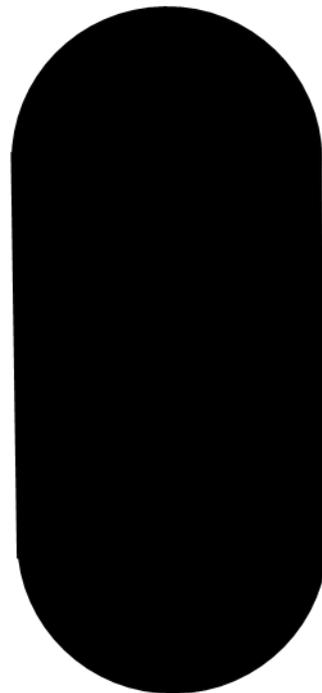
Matter 4 – Assessment of Housing Need, the Housing Requirement and Mix and Choice of Housing

Supplementary Questions

Hearing Statement – January 2023

William Davis Limited

Representation IDs: PSLP/344 & PSLP/564





This Hearing Statement, in response to Supplementary Questions, is submitted on behalf of William Davis Limited (WDL) and supports representations submitted to the Charnwood Local Plan (Draft Submission), July 2021 and Hearing Statements submitted in May 2022.

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?

1.1 It is agreed that the minimum local housing need figure for Charnwood is 1,189 dwellings per annum, taking account of meeting a proportion of Leicester's unmet needs. Over the submitted 16 year plan period of 2021 to 2037 this amounts to an overall housing requirement of 19,024.

1.2 However, there are clear reasons why the overall housing requirement should increase.

1.3 As noted in our previous Matter 4 submission, there are specific local circumstances in relation to the significant job creation at the Loughborough Enterprise Zone and East Midlands Freeport which justify an increase to the housing requirement above Local Housing Need. At the very least the Plan needs to justify why an increase is not necessary as a consequence of these planned economic uplifts.

1.4 It was also previously noted that there has been a marked worsening in housing affordability locally which would add an additional 41 dwellings per annum (dpa) to local housing need utilising the standard method. This would equate to 1,230 dpa.

1.5 Finally, the Framework states that strategic policies should look ahead over a minimum of a 15 year period post adoption. If the Plan were to be adopted in 2023, this would mean extending the plan period by a year. Yet, realistically the Plan is



unlikely to be adopted until 2039 given the stages in the examination, including the consultation on Main Modifications and likely identification of additional sources of supply.

1.6 The above generates the following scenarios:

Table 1 - Housing Requirement Scenarios			
Scenario	Plan Period		
	2021-37	2021-38	2021-39
Local Housing Need with Leicester City's unmet need	19,024 dwellings	20,213 dwellings	21,402 dwellings
Local Housing Need with worsened affordability ratio and Leicester City's unmet need	19,680 dwellings	20,910 dwellings	22,140 dwellings

1.7 In order to address worsening affordability and provide certainty that the Plan will deliver its strategy for a minimum of 15 years, it is considered that the housing requirement should be a minimum of 22,140 dwellings between 2021 and 2039 at 1,230 dwellings per annum. This would ensure the Plan is positively prepared and consistent with national policy. Note that Table 1 does not take account of an economic uplift, which is considered appropriate but has not been quantified.

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?

1.8 No. As it currently stands the Council has identified a current supply of 19,641 dwellings between 2021 and 2037. Our previous Matter 4 statement noted that



against a requirement for 1,189 dpa during this period it would leave only a 2.3% surplus, which would result in the Plan vulnerable to change over its lifespan as there is little flexibility. The Plan is therefore not positively prepared and not consistent with national policy and not likely to be effective.

- 1.9 If the overall housing requirement is increased to address housing affordability or extend the plan period as suggested above, this would result in a deficit based on current supply.
- 1.10 It is noted that the Council has engaged with promoters over the potential to increase the capacity of existing proposed allocations, and WDL has agreed to revised estimates of housing delivery where possible (see further submissions in respect of Matter 6).
- 1.11 It remains to be seen to what extent cumulative increases in supply through existing sites can meet the housing requirement, and this will clearly be tested during the course of the examination. However, it is likely that some additional allocations are necessary. It must be ensured that any additional sites are in accordance with the Plan's strategy and yet do not lead to saturation in any particular locality which, would slow delivery.
- 1.12 Experience suggests that the identification of additional sites, and testing at examination is likely to take at least between six to twelve months.

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