

HEARING STATEMENT - CHARNWOOD LOCAL PLAN EXAMINATION
MATTER 4: ASSESSMENT OF HOUSING NEED, THE HOUSING REQUIREMENT AND MIX AND CHOICE OF HOUSING

This Hearing Statement is submitted on behalf of Bowbridge Homes (Nanpantan) Ltd. and should be read in the context of the Hearing Statements previously submitted to the Programme Officer on 6th June 2022 and in conjunction with earlier representations dated 23rd August 2021 [REF: PSLP/630] submitted pursuant to the consultation by Charnwood Borough Council on its Pre-Submission Draft Local Plan 2021-37 [REF: SD/2] of July/August 2021. This Hearing Statement answers specific questions as set out in the Inspectors' Updated Matters, Issues & Questions document issued on 5th December 2022. The Inspectors' Issues and Questions are included in **bold** type.

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

Q4.1 Is basing the assessment of housing need on the Local Housing Need figure in the standard method robust and is the housing requirement of 17,776 dwellings in Policy DS1 justified? What evidence supports this approach and should any upward adjustments be made for economic growth or to support the delivery of affordable housing?

Whilst noting the reference to 17,776 dwellings to be 'overtaken' by the initial findings of the Examination Inspectors (Exam 55), the standard methodology is considered to be a sound means of determining the housing requirement, though with this to establish the starting point as a minimum number of houses rather than as a cap. As set out in the PPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID: 2a-010-20201216). The PPG states that a higher figure can be considered sound providing it adequately reflects current and future demographic trends and market signals. However, the PPG does not set any limitations on a higher figure, which is a matter of judgement. The Government's objective of significantly boosting the supply of homes as set out in NPPF paragraph 60 remains.

As set out in our original Hearing Statement for Matter 4, as submitted on 6th June 2022 and in our earlier representations dated 23rd August 2021 [REF: PSLP/630], which were submitted during the Council's consultation on the Pre-Submission Draft Local Plan [REF: SD/2], the scale of development proposed in the Plan is insufficiently ambitious and will fail to support sustainable economic growth during the Plan period. As such, the Council should have considered a higher housing requirement and with Policy DS1 also being amended to set out the Council's housing requirement as a minimum figure – this latter point also referred to in our accompanying Hearing Statement for Matter 1.

Whilst the Examination Inspectors' report the increased minimum housing requirement for Charnwood as 1,189 dwellings per year in their initial findings (Exam 55), this is purely as a result of accommodating an apportionment of Leicester's unmet need. Over and above this, it would also be appropriate for the Examination process to provide for greater flexibility in the supply of housing land, as set out in further detail below.

Supply

Q4.3 Will the proposed supply of 19,461 dwellings set out in Policy DS1 against a requirement of 17,776 dwellings incorporate a sufficient 'buffer' to allow for non-delivery as well as providing choice and flexibility in the supply of housing land?

Our comments in respect of a sufficient buffer are included in our response to Supplementary Question 2 below.

Supplementary Question 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 higher figure?

As set out above in our response to Q4.1, whilst the Examination Inspectors report the minimum housing requirement for Charnwood should be increased from 1,111 dwellings per year to 1,189 dwellings per year in their initial findings (Exam 55) – equivalent to 19,024 dwellings per year during the Plan period in order to accommodate an apportionment of Leicester's unmet need - it would also be appropriate for the Examination process to provide more generally for greater flexibility in the supply of housing land so as to ensure it has been positively prepared. At present, the Plan is insufficiently ambitious and will fail to support sustainable economic growth in the Borough over the Plan period.

Our original Hearing Statement for Matter 4, as submitted on 6th June 2022, and our earlier representations dated 23rd August 2021 [REF: PSLP/630], which were submitted during the Council's consultation on the Pre-Submission Draft Local Plan [REF: SD/2], set out the typical difficulties related to strategies where housing land supply ["HLS"] is particularly dependent upon one or relatively few large strategic sites, demonstrating that, in such instances, greater numerical flexibility should be applied than if the HLS was more diversified, and with housing delivery instead best optimised via delivery of the widest possible range of housing site sizes and market locations, providing suitable land buying opportunities for small, medium and large housebuilding companies and ensuring a continuous short to medium term HLS.

There is therefore justification for a higher figure to ensure the Plan has been positively prepared, the extent of which in terms of a suitable buffer is explored in response to Supplementary Question 2 below.

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 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 timescales for identifying sites?

Whilst the Pre-Submission Draft Local Plan [REF: SD/2] includes a circa 10% headroom within its provision of 19,461 dwellings to 2037, based on a housing requirement figure of 1,111 dwellings per year, this would be reduced to only circa 2% if to also address the increased minimum housing requirement of 1,189 dwellings per year (19,024 dwellings in total) so as to include Leicester's unmet housing needs apportionment for Charnwood, as reported by the Examination Inspectors in their initial report (Exam 55). In order to maintain a circa 10% headroom above the increased minimum requirement, the Plan will need to include allocations for an additional circa 1,465 dwellings during the Plan period, increasing the annual housing requirement to circa 1,280 dwellings per year.

However, we consider even a 10% headroom to provide insufficient flexibility and highlight that our original Hearing Statement for Matter 4, as submitted on 6th June 2022, and our earlier representations dated 23rd August 2021 [REF: PSLP/630] referred to neighbouring Harborough District Council including a 15% contingency over and above its minimum housing requirement and with the Examination Inspector in that instance specifically commenting that this was to provide resilience and was not to be regarded as the Council's contribution to meeting Leicester City's unmet housing needs. A similar approach is advocated in this instance, with a 15% headroom above the increased housing requirement of 1,189 dwellings per year (19,024 dwellings in total) amounting to a need for allocations to accommodate an additional circa 2,416 dwellings during the Plan period, increasing the annual housing requirement to circa 1,367 dwellings per year.

Furthermore, if the Plan period was to be extended by at least an additional year in order to ensure it plans for a minimum of 15 years post-adoption, as required by NPPF paragraph 22 – and as suggested in our accompanying Hearing Statement for Matter 1 - the overall requirement, again including Charnwood's minimum apportionment of Leicester's unmet housing need as reported by the Examination Inspectors in their initial findings (Exam 55) , would amount to circa 20,213 dwellings. A 15% headroom above this amount to provide for appropriate flexibility would result in an overall need for 23,245 dwellings, which, set against the housing provision of 19,461 proposed in the Pre-Submission Draft Local Plan, would result in a need for allocations for at least an additional circa 3,784 dwellings across the extended Plan period.

The Plan should therefore be modified to increase the housing requirement through the allocation of further sites in order to provide for the apportionment of Leicester City's unmet housing need as reported in the Examination Inspectors' initial findings (Exam 55), as well as to provide more generally for greater flexibility in the HLS.

As stated in our original Hearing Statement for Matter 4, as submitted on 6th June 2022, a range of sites have already been considered through the Sustainability Appraisal [REFS: SD/5 and SD/6], with opportunities available which align with the proposed spatial strategy and its focus on development in the main urban areas of the Borough and which are suitable, deliverable and available now. In this respect, our client's site on land off Leconfield Road, Nanpantan, Loughborough - previously included as housing allocation HS33 in the Regulation 18 consultation of the Draft Charnwood Local Plan 2019-36 [REFS: SD/20 and SD/20a] (and later assessed as site PSH447 in the Sustainability Appraisal [REFS: SD/5 and SD/6] of May 2021) - provides such an opportunity to help address this additional requirement, in a highly sustainable location on the edge of the main Urban Centre of Loughborough. Our representations dated 23rd August 2021 [REF: PSLP/630], which were submitted during the Council's consultation on the Pre-Submission Draft Local Plan [REF: SD/2], set out that, with our client as a housebuilder, this site can deliver up to 30 dwellings, with associated access, landscaping, open space and drainage infrastructure within the first five years of the Plan and with further assessments

undertaken since those earlier representations concluding that wider benefits in terms of specifically identified off-site biodiversity enhancements can also be delivered as part of the development.

Our aforementioned representations of 23rd August 2021 [REF: PSLP/630] included a Parameter Plan, Landscape Masterplan and Illustrative Layout Plan to demonstrate how this site could deliver up to 30 dwellings in an appropriate manner and with a copy of the latter being copied below.

Illustrative layout for 30 dwelling scheme on land off Leconfield Road, Nanpantan, Loughborough

