

## **Charnwood Local Plan Examination**

### **Hearing Statement on behalf of Jelson Homes**

#### **Matter 4: Assessment of Housing Need, The Housing Requirement and Mix and Choice of Housing**

June 2022

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**For and on behalf of Avison Young (UK) Limited**

## **Matter 4 – ASSESSMENT OF HOUSING NEED, THE HOUSING REQUIREMENT AND MIX AND CHOICE OF HOUSING**

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

- 1. Q. 4.1 – Is basing the assessment of housing need and the housing requirement positively prepared, justified by the evidence and consistent with national policy?**
  - 1.1 No, the NPPF is clear that in order to determine the number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method and that in addition to the local housing need, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
  - 1.2 The Council calculates that its local housing need is 17,776 for the period 2021 to 2037. The Leicestershire Authorities SoCG on the distribution of Leicester’s unmet need indicates that, of Leicester’s unmet housing need, Charnwood should accommodate 1,248 dwellings. For the reasons set out in our responses to the Questions posed by the Inspectors in respect of Matter 1 (Duty to co-operate), we have fundamental issues with work undertaken by Icenis which underpins the SoCG and as a consequence we do not believe that apportionment of Leicester’s unmet need detailed in the SoCG is correct.
  - 1.3 If the Council’s assessment of local housing need does not properly address the unmet needs of Leicester City then the Plan’s housing requirement cannot possibly be positively prepared and it is not therefore consistent with national policy.
  - 1.4 To address this, the apportionment of Leicester’s unmet need requires proper testing and a solution that satisfies Leicester’s unmet needs as close to where the need arises as possible. This means focussing growth in those areas that have the strongest functional relationship with Leicester (i.e. Charnwood). The Council should then factor these adjustments into its assessment of local housing need to arrive at its housing requirement, thus ensuring that the housing requirement is appropriately prepared, justified by evidence and consistent with national policy.
- 2. Q. 4.3 – 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?**
  - 2.1 No, the Council calculates that its local housing need using the Standard Methodology is 1,111 dwellings per annum for the period 2021-2037. In other words, 17,776 new homes over the Plan period. We have two issues with this.
  - 2.2 First, the Council has said that that the Plan will cover a 16 year period from its adoption in 2021. However, we are already in 2022 and therefore the Plan period needs to be moved on a year which adds an additional 1,111 dwellings to the Council’s housing requirement taking it to 18,887 dwellings.
  - 2.3 Second, it does not take account of Leicester’s unmet housing need. The Leicestershire authorities SoCG indicates that, of Leicester’s unmet housing need, Charnwood should accommodate an additional 1,248 dwellings (78 dpa). However, we are of the view that Charnwood’s share of Leicester’s unmet need should be 292 dpa which would mean that it needs to make provision for an additional 4,672 dwellings over the next 16 years. On this basis, we say that the Council’s housing requirement increases to 23,559 for the period 2022/2038. Even if we are wrong about how much of Leicester’s

unmet need should be apportioned to Charnwood, the SoCG indicates that Charnwood still has to make provision for a further 1,248 over the next 16 years. Therefore, the Local Plan needs to provide for the delivery of a minimum of 20,135 dwellings overall.

2.4 The Council then needs to factor in an appropriate buffer. Typically, Authorities build greater flexibility and robustness into their Plans by providing for at least 10% (and often 15% - 20%) more homes than are required as doing anything less runs the risk of the Plan failing to satisfy the requirements of the 'presumption' at paragraph 11 of the NPPF. Assuming the Authority takes a cautious approach and plans to deliver 10% more homes over the Plan period, then as a minimum then Policy DS1, should be amended so that it provides for the delivery of 22,149 dwellings. This would in our view provide a robust and appropriate approach for the distribution of further housing development over the long term in line with the provisions of national planning policy.

**3. Q. 4.9 - Is there an identified need to apply the nationally described space standard taking account of the evidence about the size and type of dwellings being built in the area? Where is that evidence and has the impact on development viability been assessed?**

3.1 Policy H3 requires all new residential development to meet the minimum Nationally Described Space Standards (NDSS) (or any replacement standards produced by the Government). However, criteria (f) of paragraph 130 the NPPF and the corresponding footnote (49) make clear that "...Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified." If the Council intends to pursue such a policy then it needs to commission the necessary evidence to support its approach. As things stand it hasn't done this.

3.2 The NPPG makes clear that "*where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies.*" The NPPG also makes clear that in doing so, local authorities should take into account matters such as "*need, viability and timing*". It is clear that far more work needs to be done by the Council to justify its approach on NDSS and therefore the Policy as it stands, is not sound.

3.3 Even if the need for such a policy can be evidenced Jelson remains concerned about the proposal to introduce NDSS as a blanket requirement. Housing size is a key determinant of cost and affordability, and it is not necessarily the case that simply because a house is bigger it will better meet the needs of every consumer. Keeping prices low will remain a priority for many purchasers rather than imposing arbitrary space requirements. Jelson would therefore encourage amendments to Policy H3 so that it seeks a proportion of homes to be NDSS compliant rather than every home so that consumers can continue to prioritise what is important to them when making house purchasing decisions.

3.4 Transitional arrangements will also be important. Whilst the industry (including Jelson) is constantly reviewing house specifications, adapting the range to suit the policies of individual planning authorities can take time and certainly does not happen overnight. It will be important therefore that Policy H3 can be justified then there is a period of time between formal adoption of a policy and when its provisions kick in.

**4. Q. 4.14 - Are the policy thresholds justified by the viability evidence and is it clear how many plots would be sought on sites of 10 to 250 dwellings? What evidence is available to demonstrate the level of interest in self and custom build dwellings?**

4.1 Jelson does not support this policy as a matter of principle. There is no legislative requirement and nor does national planning policy stipulate that housebuilders must provide / give over plots for custom housebuilding. Indeed, legislation and policy states that it is incumbent on local authorities,

rather than housebuilders, to ensure that it grants sufficient planning permissions to meet the identified demand for this type of housing. The NPPG encourages rather than requires Council's to engage with developers about the contribution their schemes might be able to make towards the supply of self and custom build plots and makes clear that this is only where housebuilders have expressed an interest in giving over land in this way.

- 4.2 In regard to the second part of the question, for the reasons discussed in our representations to the Regulation 19 consultation, Jelson does not believe that the Council possess the necessary data to (a) enable it to demonstrate that those expressions of interest it has received in respect of self build and custom build housing translates into actual demand, in the event that plots be made available; and (b) large housing sites would be a preferred location for those who are looking to build their own home.

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