



The countryside charity
Leicestershire

Charity Number: 1164985

CHARNWOOD LOCAL PLAN EXAMINATION

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

Submission from CPRE Leicestershire

June 2022

Representation Number: 340

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

Need

Question 4.1

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?

1. Leicestershire CPRE does not support the housing figures as identified. We consider that the Council should have considered adopting the ONS2016 figures and considered whether the lower figure could be justified based on proportionate evidence.
2. The table below sets out the housing need for Charnwood during the Plan Period using the Standard Methodology based on the 2021-2031 base period and the latest 2020 Affordability Figures. We have added a 10% contingency in line with the plan approach and created a final excess in line with the Plan.

Charnwood Housing Need (2021-2037)	Annual Demographic Need	Standard Methodology Output	Plan Period (16 Years)	10% contingency	Excess based on 10,603
SM ONS 2018	920	1131	18,096	19,906	9303
SM ONS 2016	769	946	15,136	16,650	6047
SM ONS 2014	904	1111	17,776	19,554	8951

3. The two more recent ONS projections rely on lower (and perhaps more realistic) national housing based on differences in assumptions on things such as mortality and migration, but also significantly an assumption that household size will not decline as rapidly as previously expected. However, the ONS2018 redistributes housing need largely based on recent changes to NHS reporting which may mean it is less reliable.

4. The Local Plan the housing requirement also includes a 10% contingency on all sites.

5. However, it would seem that the likelihood of failure to implement is lower on sites with planning permission. The SHELAA does not include any data on unimplemented planning permissions to justify this position although some sites are moved to a later date for implementation (Para 7.14).

6. The Black Country, as one example, is assuming a failure rate of 5% for commitments (*Examination Reference*¹). Using the 2014 ONS figures this would create an overall requirement of 19,023². The table below applies that approach to all the ONS projections.

Charnwood Housing Need (2021-2037)	Annual Demographic Need	Standard Methodology Output	Plan Period (16 Years)	Contingency (10% and 5% on Commitments)	Excess based on 10,603
SM ONS 2018	920	1131	18,096	19,375	8772
SM ONS 2016	769	946	15,136	16,119	5516
SM ONS 2014	904	1111	17,776	19,023	8420

7. CPRE consider that the excess housing should further be reduced because of additional supply from windfalls (1120 dwellings plus), from including all permitted homes on the North Leicester Urban Extension (1295 dwellings) and from some modest additions to yield (e.g., from a density policy) but we will address those under Matter 7.

8. Overall, taking account of this additional supply, we consider the excess housing needing to be allocated would then amount to 3,101 (ONS2016) or 6,005 (ONS2104). This would be robust and would allow for significant greenfield sites to be removed from the Plan while still meeting genuine need.

¹ CPRE Matter 4 black country urban capacity study extract from Black Country Urban Capacity Study (May 2021) Para 2.1.14 [Housing \(dudley.gov.uk\)](https://www.dudley.gov.uk)

² (10,603 x 1.05) + (7,173 x 1.1) - 11,133 + 7,890 = 19,023

Supply

Question 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?

9. See answer to 4.1. We accept the need for some buffer, but consider it should be reduced of 5% for sites with Planning Permission where there is a stronger commitment to development.

(Note paragraph 2.14 refers to a buffer of 1778 dwellings in Table 2. A main modification will be necessary to correct this.)

Question 4.4

Would at least 10% of the housing requirement be accommodated on sites no larger than one hectare as set out in NPPF paragraph 69?

10. To reach this target would require 1946 homes to be provided on sites under 1 hectare. There are 455 homes included on sites of less than 35 dwellings in the table in DS3. There may be some additional sites under 1 hectare, (including some of the 2248 currently with planning permission not on the three large sites), but it seems unlikely to us that this target would be met subject to further evidence from the Council. However, were an allowance included for small scale windfalls many of these would inevitably be on smaller sites.

Issue 2 - Will the Plan provide for a choice and mix of housing to meet the needs of different groups in the community?

Policy H1 - Housing Mix

Question 4.5

Will the policy provide for a mix and choice of housing to meet the needs of different groups in the community and is it consistent with national policy in that regard?

Question 4.6

Is the scope of the policy appropriate and is greater clarity needed in paragraph 4.5 in relation to the size of affordable properties that are most needed?

Question 4.7

Is the policy sufficiently flexible to take account of changing conditions to the private rented sector over time?

11. As drafted, we do not consider Policy H1 gives an accurate reflection of the Housing Mix identified in paragraph 4.5 Table 6, limiting its use by a decision maker to determine if a planning application meets with the aims and is in accordance with the Local Plan Policy. It is only subject to interpretation.

12. Amended Policy Suggestion:

We will ~~seek~~ **REQUIRE** a mix of house types, tenures and sizes that meet the overall needs of the Borough in line with our most up to date evidence as Table 6. Preferred Mix of New Housing by Size and Tenure

<i>Table 6: Preferred Overall Mix of New Housing by Size and Tenure Preferred Overall Mix of New Housing by Size and Tenure Table</i>				
	<i>1 bedroom</i>	<i>2 bedroom</i>	<i>3 bedroom</i>	<i>4+ bedroom</i>
<i>Market</i>	<i>Up to 10%</i>	<i>20-30%</i>	<i>45-55%</i>	<i>15-25%</i>
<i>Affordable home ownership</i>	<i>10-20%</i>	<i>35-45%</i>	<i>30-40%</i>	<i>5-15%</i>
<i>Affordable Housing (rented)</i>	<i>60-75%</i>		<i>20-30%</i>	<i>Up to 10%</i>

We will do this whilst having regard to the extent to which those needs have already been met by other development, local housing needs and housing market evidence, economic conditions, viability and site-specific circumstances.

Policy H2 – Housing for Older People and People with Disabilities

Question 4.8

Are the requirements in Policy H2 for M4(2) and M4(3) standard homes justified having regard to the factors listed in the Planning Practice Guidance and the evidence in the Housing Needs Assessment (EB/HSG/1)? Is it clear what is meant by an ‘appropriate proportion’ in relation to the requirement for M4(3) homes? Has the impact on development viability been assessed and what was the outcome?

13. The Policy is weak in its interpretation of the supporting text. Stating that: ‘we will also support the provision of bungalows, instead of promote, or actively support the provision of bungalows, etc...’

14. There is a need to strengthen the Policy so as not to rely on Developers controlling the provision of bungalows and other accommodation in order that proper provision is made for the groups covered by the Policy, giving positivity to the Policy.

15. We suggest amending the final part of Policy H2 Housing for Older People and People with Disabilities to read:

We will also:

~~support~~ **PROMOTE** the provision of bungalows or other single level properties;
and

~~support~~ **PROMOTE** the provision of specialist accommodation where it addresses the needs of older people in accordance with identified housing needs and care requirements, or of younger people with special accommodation needs.

16. We are asking for the word 'support' to be replaced by 'promote' and a more positive action-oriented policy approach.