

For and on behalf of
Gloebal Ltd

**Charnwood Local Plan
Examination in Public
Matter 4: Assessment of Housing Need, the Housing Requirement and
Mix and Choice of Housing**

**Land at Oakley Road (HA33) and
Land North of Hallamford Road and West of Shepshed (HA35)**

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CONTENTS	PAGE
1.0 Introduction.....	4
2.0 Issue 1 - Is the assessment of housing need and the housing requirement positively prepared, justified by the evidence and consistent with national policy?.....	5
3.0 Issue 2 - Will the Plan provide for a choice and mix of housing to meet the needs of different groups in the community?	6

1.0 INTRODUCTION

- 1.1 This response to Matter 4 of the Inspectors' MIQs in respect of the Charnwood Local Plan (CLP) 2021-37 Examination has been prepared by the Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd. SPRU have been instructed to appear at the Examination on behalf of Gloeal Limited.
- 1.2 SPRU have made submissions on behalf of Gloeal Limited to the Regulation 19 consultation (July – August 2021) on the emerging Local Plan. This statement should be read in conjunction with these submissions (representation numbers PSLP/562 and PSLP/563).
- 1.3 These earlier submissions set out that the allocation of sites HA33 (Land at Oakley Road) and HA35 (Land North of Hallamford Road and West of Shepshed) is supported and that the allocation of the sites for residential development is sound. The evidence highlights that the sites are being actively promoted and are progressing towards the submission of planning applications. Supporting work to support bringing forward the abovementioned sites, including the preparation of indicative masterplans, further demonstrates that the allocation of the land in question would be justified and effective and that development would be deliverable and developable in the early years of the plan period following adoption.
- 1.4 In addition, the sites would constitute a well related and logical extension to the urban area (as well as the other proposed allocations and previously constructed developments along the north western side of Shepshed) in a sustainable location, supporting and offering prospective residents good access to public transport, education, employment and other local facilities and services. The sites are therefore well placed to encourage more sustainable patterns of travel and reduced reliance on the private car, consistent with the principles for sustainable development set out in the NPPF.
- 1.5 Nevertheless, there remain a number of issues raised in our previous representations that require modifications to the Draft Local Plan to ensure it meets the tests of soundness. In summary, this Hearing Statement seeks to assist the Inspectors through the response to relevant MIQs and further reinforces the justification for the following proposed suggested modifications in respect of allocations HA33 (Land at Oakley Road) and HA35 (Land North of Hallamford Road and West of Shepshed) and related elements of the Plan:
 - The Council should ensure the minimum buffer of 10% above the baseline housing requirement of 17,776 units is provided for within the Plan. The proposed increased capacities of HA33 and HA35 (229 units in total), as set out in our Matter 6 statement, will assist in ensuring this minimum buffer is met.

2.0 ISSUE 1 - IS THE ASSESSMENT OF HOUSING NEED AND THE HOUSING REQUIREMENT POSITIVELY PREPARED, JUSTIFIED BY THE EVIDENCE AND CONSISTENT WITH NATIONAL POLICY?

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?

- 2.1 The housing requirement of 17,776 set out in Policy DS1 should be expressed as absolute minimum. The planned housing need of 17,776 homes, as confirmed at paragraph 61 of the NPPF 2021, is a minimum, not a maximum, and should not be regarded as a restriction to otherwise sustainable development from coming forward.
- 2.2 The table in Policy DS1 sets out the 'number of homes' that are anticipated will be developed in each of the main settlements, groups of settlements and urban areas across the Plan period.
- 2.3 This table should therefore instead identify these figures as 'Minimum number of homes' to be delivered, as the overall housing requirement is a minimum figure. The capacity figures identified in the individual site allocation policies can also only be indicative figures which may increase slightly at application stage, subject to relevant design, density and sustainability considerations.

4.2 Is the housing requirement of 60 dwellings for the Wymeswold Neighbourhood Plan justified and what evidence has that figure been based on?

- 2.4 No response.

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

- 2.5 The Local Plan currently includes a 10% provision for flexibility (1,778 dwellings) which allows for unforeseen changes that can affect the delivery of sites (SD-2, paragraph 2.14). This results in a total housing requirement of 19,554 (SD-2, Table 2). However, the development strategy set out in Policy DS1 provides for delivery of a total of just 19,461 homes (SD-2, Table 5). As such, there is a potential under-provision of 93 dwellings in the Local Plan against the desirable provision for a 10% buffer against the housing requirement.
- 2.6 The Plan should consider increasing the allocation of sites to ensure this 10% buffer is provided for, as a minimum. The additional capacity that we have identified can be provided at sites HA33 and HA35 of 229 units in total (as set out in our Matter 6 statement) will assist in ensuring this buffer is provided and that there is sufficiently flexibility in the Plan.

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?

- 2.7 No response.

3.0 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

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?

3.1 No response.

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?

3.2 No response.

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

3.3 No response.

Policy H2 – Housing for Older People and People with Disabilities

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?

3.4 No response.

Policy H3 – Internal Space Standards

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?

3.5 No response.

Policy H4 - Affordable Housing

4.10 Is the supporting text to the policy and the policy itself sufficiently clear for Plan users in relation to the calculations for the provision of affordable housing?

3.6 No response.

4.11 Does the viability evidence support the percentages of affordable housing sought on greenfield and brownfield sites and the threshold of 10 or more dwellings at which they will be required?

3.7 No response.

4.12 Is there any evidence to indicate that the First Homes model is the appropriate mechanism to meet affordable housing needs in the Borough? How will First Homes be delivered as part of the mix of affordable housing?

3.8 No response.

4.13 How will the First Homes model assist in meeting the need for shared ownership dwellings?

3.9 No response.

Policy H6 - Self-Build and Custom Housebuilding

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?

3.10 No response.

Policy H7 - Houses in Multiple Occupation

4.15 Are the policy thresholds justified and what evidence are the 10% 'concentration' figure and 100 metre radius based on?

3.11 No response.

4.16 Is there evidence to indicate that the policy is based on a robust methodology? How would 'over concentration' be assessed having regard to local geographical factors?

3.12 No response.

Policy H8 - Campus and Purpose-Built Student Accommodation

4.17 Is there evidence to indicate that the policy will meet the accommodation needs of the student population over the lifetime of the Plan?

3.13 No response.

Policy H9 - Gypsies, Travellers and Travelling Showpeople

4.18 What is the identified need for accommodation for Gypsies, Travellers and Travelling Showpeople? Is the Gypsy and Traveller Accommodation Assessment (EB/HSG/4) up to date and consistent with national policy in identifying these accommodation needs?

3.14 No response.

4.19 Does the policy set out appropriate and clear criteria for the assessment of planning applications and is the requirement to demonstrate an identified need consistent with national policy?

3.15 No response.

4.20 Is there evidence to indicate that the need for this type of accommodation will be delivered through the development of Sustainable Urban Extensions?

3.16 No response.

4.21 Overall, does the Plan set out a positively prepared, justified and effective strategy for the provision of housing? Will it be effective in addressing the housing needs of particular groups? Are any main modifications necessary for soundness?

3.17 No response.

