



Charnwood Borough Council Local Plan Examination

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

Hearing Statement

June 2022



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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, justified by the evidence and consistent with national policy?

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?

- 2.1.1 The Plan has based its housing proposals on the annual housing target derived from the Government's Standard Methodology, which details a Local Housing Need (LHN) at the time the Plan was submitted of 1,111 dwellings per annum. The Housing Topic Paper (TP/1) concludes that there is no need to increase the LHN for the Borough to meet the needs for affordable housing or for economic reasons.
- 2.1.2 It is common knowledge that the standard methodology is the starting point for calculating housing need and only provides the minimum number of homes needed to meet the demographic baseline of housing needs. It is important that the housing needs of Charnwood are not under-estimated.
- 2.1.3 In respect of the delivery of affordable housing, Gladman note that the Housing Needs Assessment (EB/HSG/1) details a need for 476 affordable rented homes each year in the Borough, equivalent to 7,616 affordable dwellings over the plan period. This established need is a significant proportion (39%) of the housing land supply provision in the Plan. The updated 2022 Housing & Economic Needs Assessment (HENA) published alongside the latest Statement of Common Ground details a need for 455 affordable rented homes each year in the Borough.
- 2.1.4 It is our understanding that the Council have not confirmed how many affordable homes it expects to deliver through this Plan. If the Council cannot meet the identified need for affordable housing, then they must, as set out in paragraph 2a-024 of PPG,

consider whether the total amount of housing delivered through this Plan should be increased to help deliver the required number of affordable homes.

2.1.5 Policy H4 identifies a requirement to deliver 30% affordable housing on all major housing developments (except for brownfield sites where 10% is sought). 30% of the overall housing land supply provision of 19,461 dwellings is 5,838 dwellings. On a best-case scenario there is, thus, a shortfall of at least 1,778 affordable homes over the plan period and the Plan will not achieve sufficient affordable homes to meet identified needs.

2.1.6 Gladman acknowledge that the Council may not be able to meet all affordable housing needs, nonetheless the scale of affordable needs and the disparity between what is needed and what is expected to be delivered demonstrates a clear case for an uplift in the overall level of the planned housing requirement to ensure sufficient affordable housing can be delivered.

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?

2.1.7 The housing requirement for Charnwood and the level of supply necessary to meet that requirement need is clearly distinguished in policy DS1 of the Local Plan. The Council proposes a headroom of 1,685 dwellings (c. 9.5%) between the overall housing land supply of 19,461 dwellings and the Borough's minimum LHN (excluding unmet needs from Leicester) of 17,776 dwellings.

2.1.8 We agree that it is appropriate for the Council to plan for the delivery of more homes than might strictly be required to satisfy the area's locally assessed need. This approach recognises that sites do not deliver as expected and ensures, as required by paragraph 35 of the NPPF, that the housing requirement is deliverable over the plan period. As we have set out in our previous representations, we do not consider that the level of surplus land provided through the Plan is sufficient, however.

2.1.9 There is a reliance in the Plan on a limited number of strategic sites to meet housing needs in Charnwood with the three SUEs at northeast of Leicester, Birstall and West

of Loughborough collectively providing 8,355 dwellings over the plan period (or 47%, of the homes the Borough needs). Complexity in delivering such sites means that there can be delays as to when homes on any site will be delivered and it is important to ensure there is sufficient flexibility in the supply of homes over the plan period to take account of any delays.

2.1.10 Indeed, the Council have centred their housing delivery strategy around these three sites for at least the last 15 years yet delivery of new homes at these locations have not delivered within the timeframes envisaged. Issues with non-delivery on these sites has led to several periods when the Council has been unable to demonstrate the requisite five-year housing land supply.

2.1.11 Given that the housing land supply in Charnwood is highly dependent upon a few strategic sites where there remain uncertainties as to infrastructure and potential delays to homes coming forward, we suggest that the supply buffer should be increased to at least 15% of the proposed housing requirement to take account of these risks and ensure needs are met consistently across the plan period.

Question 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?

2.1.12 As set out above, to guard against delivery issues on the allocated strategic sites and correlated housing land supply issues, we consider that an uplift for flexibility to 15% is justified. Gladman would also suggest that a housing requirement above the minimum figure set by the standard method would be justified and positively prepared, as it will enable the Council to better meet affordable housing needs in Charnwood.