

Charnwood Local Plan Examination

Matters and Issues Statement

Representor **CEG**
ID **574**
Prepared by **Lichfields**
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Matter 4 Assessment of housing need, the Housing Requirement and Mix and Choice of Housing

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

Q 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?

- 1.1 CEG supports Charnwood’s commitment to plan to meet the Government’s calculation of housing need using the Standard Methodology as well as the recognition at supporting text 2.12 to DS1 (Development Strategy) that a significant proportion of this housing need will be met through the Sustainable Urban Extensions (SUEs), including at the North East of Leicester (“Thorpebury”).

Supply

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?

- 1.2 Whilst there is no national policy or guidance which dictates how large a supply buffer should be for the purpose of plan making, CEG considers the buffer of 1,685 dwellings is appropriate. This is because the Housing Trajectory includes a mix in the type of supply from both smaller and medium sized sites, alongside the larger SUEs, a number of which have planning permission and are well progressed. Further, increasing the buffer risks undermining the delivery of the SUEs and encouraging a less sustainable pattern of development where too much housing is delivered on smaller sites without the necessary investment in supporting infrastructure, facilities and services.

- 1.3 Thorpebury is a deliverable site that will make a significant contribution to the Council's housing delivery in both the immediate and longer term. The whole site has outline planning permission and there are approved reserved matters applications, including the whole of the first phase (as expanded in response to Matters 6 and 7). The first homes from Thorpebury are expected to be delivered this autumn (2022). CEG has agreed with Charnwood BC, via a Statement of Common Ground, that it is realistic to estimate that 455 dwellings will be delivered in the first five years of the plan period (21/22 – 25/26), with a total of 2,805 dwellings in the plan period (see CEG's Matters 6 and 7 Statements).

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

Policy H9 - Gypsies, Travellers and Travelling Showpeople

Q 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?

- 2.1 The supporting text to Policy H9 states that the Council considers there to be no additional needs, beyond that provided in the SUEs, for permanent pitches for gypsies and travellers or plots for travelling showpeople in Charnwood for the period up to 2037, as set in the adopted Core Strategy.
- 2.2 The 2017 Leicester City and Leicestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA, EB/HSG/4) is the principal evidence base for the draft Local Plan. The existing and future need position is however unclear from this Assessment. In particular, it is not clear if or how the provision which benefits from planning permission, including within the SUEs, has been accounted for when establishing the need or 'additional need'. Specifically, for Charnwood Borough, the GTAA identifies 'no current or future need' for Gypsy and Traveller Households (para 1.18) but a need for 8 additional plots for Travelling Show people households (paras 1.36 – 1.38). The Figures (56-59) for Charnwood in Appendix C do not appear to include any permitted pitches.
- 2.3 We cannot therefore be confident from the evidence base that the Local Plan has been informed by a clear, robust and up to date assessment of needs, and the GTAA is five years old in any event. Indeed, whilst the GTAA states that Inspectors have deemed the methodology adopted in the GTAA as the most appropriate in establishing new household formation, the GTAA also acknowledges (para 7.1) that it is difficult to make accurate assessment of current and future pitch provision beyond five years. This reinforces CEG's view that the evidence base needs to be updated.
- 2.4 Further, and notwithstanding any quantitative need which may or may not exist, CEG maintains that the need for provision within the NEoL SUE has not been evidenced. In particular, discussions with the County Council during the preparation and consideration of the application and prior to the previous local plan examination suggested that the demand for plots for Travelling Showpeople may be better met elsewhere in the borough. CEG

encouraged CBC, in its 2019 and 2021 representations, to plan for some additional provision when drafting the other detailed site allocation policies. Doing so would be consistent with the approach taken elsewhere in the draft Local Plan and consistent with national policy, to ensure development needs can be met for different groups with a degree of flexibility (para 62, NPPF).

- 2.5 Maintaining the requirements set out within the Policy H9 and the SUE policies, and LUA2 in particular, has not been justified. This matters because planning obligations to secure the delivery of pitches and/or plots will soon affect the detailed design work for the implementation of future phases of the NEoL SUE. This work should be based on and assessed against justified and effective (emerging) policy requirements.

Q 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?

- 2.6 The soundness of this policy is related to our concerns about the underlying evidence based, as set out above, and the policy support for provision 'meet an identified need' should be evaluated in this context.
- 2.7 While the policy is generally appropriate and clear, there is a need to ensure that the circumstances in which it will be applied are set out. The policy should also include a locational dimension to the identification of need and a recognition that plots for Travelling Showpeople should be easily accessible from the principal road network. 'Appropriate in scale' could be more clearly defined.

Q 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?

- 2.8 The legal agreement related to the NEoL SUE secures the previously identified requirements.
- 2.9 However, the approach maintained in the draft local plan principally relies on provision within the established SUE locations (including 4 pitches and 4 plots at Thorpebury). The Council has not reviewed the provision of plots and pitches in Policies H9 and LUA2 and their supporting text based on an up to date and robust evidence base, as discussed above.
- 2.10 CEG considers that this policy approach has not been shown to be robust or effective and suggests that it would be appropriate for the quantum, location and nature of provision to be reviewed as part of the Local Plan preparation process, including to ensure that the need exists. Such a review should have regard to the emerging spatial development strategy and the sites/locations now available for development.
- 2.11 CEG considers that the needs of Travelling Showpeople would be better met in locations which are closer to Loughborough and better able to accommodate the access requirements and maintenance activity associated with this provision. Demand will not necessarily be met by providing a site in Thurmaston when the demand from this community may be to be in/around Loughborough; this will not prevent the ongoing development of unauthorised

sites where the locational demand exists. Evidence needs to be prepared by the Council to identify where the locational need is the greatest and how this could best be served.

2.12

Overall, there is no evidence base which justifies why the requirement for permanent pitches and showpeople plots should be met within the SUEs or distributed evenly between them. To ensure needs can be met with a degree of flexibility into the future, CBC should plan for some additional provision in the site allocation policies and revise Policy H9 to reflect the current need position.