

Ian Kemp
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Our ref: 60628/

Your ref:

Dear Ian

Charnwood Local Plan Examination - Response to Matter 4

This statement to Matter 4 (Assessment of Housing Need, the Housing Requirement and Mix and Choice of Housing) of the examination of the Draft Charnwood Local Plan (“DCLP”) is submitted by Lichfields on behalf of St Philips Land Limited (“St Philips”).

It follows the submission of representations to the Regulation 19: Pre-Submission Draft of the Charnwood Local Plan (July 2021) in respect of land off Cotes Road, Barrow upon Soar, in which St Philips has land interests. For reference, the representations comprising these proposed changes were identified under Representation ID **PSLP/618**.

It should be clarified that separate representations were made by Marrons Planning on behalf of St Philips, Rosconn Strategic Land, William David Homes and Swithland Homes under Representation ID PSLP/633. However, this representation set out their joint position on Policy DS3 (HA49) with each party making wider representations to the plan through individual representations.

The National Planning Policy Framework (‘NPPF’) outlines that during the examination process a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspector’s questions which set out why we consider changes to the DCLP are necessary to ensure the soundness of the Plan.

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?

As of July 2021, being the Pre-Submission Draft Local Plan, the Council has calculated its local housing need at 17,776 dwellings (DCLP paragraph 2.8) which equates to 1,111 dwellings per annum (“dpa”) for the plan period 2021-2037.

As of April 2022, St Philips calculates the Council’s local housing need at 1,156 dwellings per annum, equating to 18,496 dwellings over the plan period. Whilst this is approximately 4% greater than the Council’s calculation, it is noted that the Planning Practice Guidance expressly allows the reliance upon superseded figures:

“...local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.” (PPG ID: 2a-008-20190220).

Given that the DCLP was submitted in December 2021, the figure of 1,111 dpa can be relied upon until December 2023. Consequently, the Council’s approach in this respect is sound.

In terms of the consideration towards upward adjustments of the housing requirement in respect of economic growth or affordable housing, the Council concludes that no upward adjustment is necessary as demonstrated in the following evidence base documents:

- Housing Topic Paper (December 2021, Ref: TP-1) – paragraph 3.17 and 3.19
- Employment Topic Paper (November 2021, Ref: TP-3)
- Housing Needs Assessment (September 2020, Ref: EB/HSG/1) – paragraph 3.71
- Housing and Economic Development Needs Assessment (January 2017, Ref: EB/EMP/1)

In summary, the Housing Topic Paper (Ref: TP-1) confirms that *“the number of homes required based on demographic changes (household formation and migration) is greater than the number that is required to meet economic needs”* (paragraph 3.15). It adds that the affordable housing evidence *“shows that a significant proportion of this need relates to households in accommodation that is unsuitable for them, but which would be available for others if the household was able to move”* (paragraph 3.18).

Overall, St Philips **agrees** with the Council’s conclusions that the local housing need figure is robust, and that no upward adjustment is necessary. Consequently, the proposed housing requirement is sound.

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?

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

Yes, the proposed housing land supply will provide a sufficient buffer to allow for non-delivery, choice and flexibility.

Overall, the proposed housing land supply equates to a buffer or “headroom” of approximately **9.4%**. It is entirely appropriate for the Council to incorporate a buffer as proposed as this ensures there is the flexibility to respond to failures to deliver the required dwellings in the allotted time frames and across the whole plan period. By way of comparison, the following are cases where the inclusion of a buffer has been found sound at examination as well as being explicitly endorsed by an Inspector:

- Chelmsford: 18% buffer¹
- South Kesteven: 18% buffer²
- Harrogate: 25% buffer³
- South Oxfordshire: 27% buffer⁴
- Mansfield: 34% buffer⁵
- Guildford: 36% buffer⁶
- Chesterfield: 59% buffer⁷

¹ Inspector’s Report to Chelmsford City Council, paragraph 154. Available at: <https://www.chelmsford.gov.uk/resources/assets/inline/full/0/3951296.pdf>

² Inspector’s Report to South Kesteven District Council, paragraph 145. Available at: <http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=25671>

³ Inspector’s Report to Harrogate Borough Council, paragraph 180. Available at: <https://democracy.harrogate.gov.uk/documents/s8649/05-Appendix1-InspectorsReport.pdf>

⁴ Inspector’s Report to South Oxfordshire District Council, paragraph 44. Available at: <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2020/11/Inspectors-Report-November-2020.pdf>

⁵ Inspector’s Report to Mansfield District Council, paragraph 159. Available at: <https://www.mansfield.gov.uk/downloads/file/1473/mansfield-local-plan-inspector-s-report>

⁶ Inspector’s Report to Guildford Borough Council, paragraph 42. Available at: https://www.guildford.gov.uk/media/29804/Appendix-1-The-Inspector-s-Report/pdf/Appendix_1_The_Inspectors_Report.pdf?m=637369059509370000

⁷ Inspector’s Report to Chesterfield Borough Council, paragraph 104. Available at: <https://www.chesterfield.gov.uk/media/1270438/final-report-27-may-2020.pdf>

Whilst the proposed 9.4% buffer is clearly not as large as the above examples, it should be noted that the Borough's housing completions since 2015/16 have exceeded the annual housing requirement of 820 dwellings per annum, as required by Core Strategy (2015) Policy CS3:

Table 1 Annual housing completions since 2015/16

Year	Net Additional Dwellings Provided
2015/16	831
2016/17	943
2017/18	1107
2018/19	1117
2019/20	993
2020/21	1116

Source: Authority Monitoring Report: 1st April 2020 to 31st March 2021 (December 2021) paragraph 7.3

Clearly, the Council is able to demonstrate a strong position in terms of recent housing delivery and therefore a proposed buffer of approximately 9.4% is sufficient.

Yours faithfully



Jon Kirby
Senior Director