

**CHARNWOOD LOCAL PLAN EXAMINATION**  
**MATTER 4: ASSESSMENT OF HOUSING NEED, THE HOUSING REQUIREMENT AND MIX AND CHOICE OF HOUSING**

**Inspectors' issues and questions in bold type.**

This Hearing Statement is made for and on behalf of Bowbridge Homes (Nanpantan) Ltd. and should be read in conjunction with our representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630] submitted pursuant to the consultation by Charnwood Borough Council on its Pre-Submission Draft Local Plan 2021-37 [REF: SD/2] of July/August 2021. This Hearing Statement answers specific questions as set out in the Inspectors' Matters, Issues & Questions ["MIQs"] document issued on 25<sup>th</sup> April 2022.

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

**Q4.1 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?**

The standard methodology is considered to be a sound means of determining the housing requirement, though with this to establish the starting point as a minimum number of houses rather than as a cap. As set out in the PPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID: 2a-010-20201216). The PPG states that a higher figure can be considered sound providing it adequately reflects current and future demographic trends and market signals. However, the PPG does not set any limitations on a higher figure, which is a matter of judgement. The Government's objective of significantly boosting the supply of homes as set out in Paragraph 60 of the NPPF remains.

As set out in our representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630], which were submitted during the Council's consultation on the Pre-Submission Draft Local Plan [REF: SD/2], the scale of development proposed in the Plan is insufficiently ambitious and will fail to support sustainable economic growth in the Borough over the Plan period. As such, the Council should have considered a higher housing requirement and with Policy DS1 also being amended to set out the Council's housing requirement as a minimum figure.

It would be appropriate for the Examination process to address the increased housing requirement generated by the agreed apportionment of Leicester City's unmet housing need to Charnwood, as outlined in our response to Matter 1 (Issue 1), as well as to provide for greater flexibility in the supply of housing land, as set out in further detail below.

## Supply

### **Q4.3 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?**

Our representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630], which were submitted during the Council's consultation on the Pre-Submission Draft Local Plan [REF: SD/2], set out the difficulties related to strategies where housing land supply ["HLS"] is particularly dependent upon one or relatively few large strategic sites, demonstrating that, in such instances, greater numerical flexibility should be applied than if the HLS was more diversified, and with housing delivery instead best optimised via delivery of the widest possible range of housing site sizes and market locations, providing suitable land buying opportunities for small, medium and large housebuilding companies and ensuring a continuous short to medium term HLS.

As set out in our Hearing Statement submitted in respect of Matter 1 (Issue 1), the Plan should make provision to deliver Leicester City's unmet needs and also include provision for appropriate flexibility. Whilst the Pre-Submission Draft Local Plan [REF: SD/2] included a circa 10% headroom within its provision of 19,461no. dwellings to 2037, this headroom would be reduced further still to only 2% if the proposed allocations were to also address the increased housing requirement of 19,024 dwellings so as to include Leicester's unmet housing needs apportionment for Charnwood. In order to maintain a circa 10% headroom as previously proposed, the Plan will need to include additional allocations for circa 1,465no. dwellings. However, we consider even a 10% headroom to provide insufficient flexibility and highlight that our aforementioned representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630] referred to neighbouring Harborough District Council including a 15% contingency over and above its minimum housing requirement and with the Local Plan Inspector in that instance specifically commenting that this was to provide resilience and was not to be regarded as the Council's contribution to meeting Leicester City's unmet housing needs. A similar approach is advocated in this instance, with a 15% headroom amounting to a need for allocations to accommodate a circa additional 1,900no. dwellings.

Furthermore, if the Plan period was to be extended by a year to 2038 in order to ensure it plans for a minimum of 15-years post-adoption, as required by Paragraph 22 of the NPPF, the overall requirement, again including Charnwood's agreed apportionment of Leicester's unmet housing need, would amount to circa 20,213no. dwellings. A 15% headroom above this amount to provide for appropriate flexibility would result in an overall need for 23,245no. dwellings, which, set against the housing provision of 19,461 proposed in the Pre-Submission Draft Local Plan, would result in a need for an additional 3,784no. dwellings.

The Plan should therefore be modified to increase the housing requirement through the allocation of further sites in order to provide for the agreed apportionment of Leicester City's unmet housing need as well as to provide for greater flexibility in the HLS.

A range of sites have already been considered through the Sustainability Appraisal [REFS: SD/5 and SD/6], with opportunities available which align with the proposed spatial strategy and its focus on development in the main urban areas of the Borough and which are suitable, deliverable and available now. In this respect, our client's site on land off Leconfield Road, Nanpantan, Loughborough - previously included as housing allocation HS33 in the Regulation 18 consultation of the Draft Charnwood Local Plan 2019-36 [REFS: SD/20 and SD/20a] (and later assessed as site PSH447 in the Sustainability Appraisal [REFS: SD/5 and SD/6] of May 2021) - provides such an opportunity to

help address this additional requirement, in a highly sustainable location on the edge of the main Urban Centre of Loughborough. Our representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630], which were submitted during the Council's consultation on the Pre-Submission Draft Local Plan [REF: SD/2], set out that, with our client as a housebuilder, this site can deliver up to 30no. dwellings from 2023, with associated access, landscaping, open space and drainage infrastructure and with further assessments undertaken since those earlier representations concluding that wider benefits in terms of specifically identified off-site biodiversity enhancements can also be delivered as part of that development.

Our aforementioned representations of 23<sup>rd</sup> August 2021 [REF: PSLP/630] included a Parameter Plan, Landscape Masterplan and Illustrative Layout Plan to demonstrate how this site could deliver up to 30no. dwellings in an appropriate manner and with a copy of the latter being copied below.

Illustrative layout for 30no. dwelling scheme on land off Leconfield Road, Nanpantan, Loughborough

