

# Charnwood Local Plan Examination. Matters, Issues and Questions.

Statement on Behalf of Redrow Homes, Davidsons  
Developments and the Helen Jean Cope Charity (PSLP 598).

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

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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?**

- 1.1. The Submission Draft Plan identifies a housing requirement of 17,776 dwellings based on a local housing need of 1,111 dwellings a year over the plan period 2021–2037. The Plan makes provision for some 19,461 dwellings through commitments and new allocations. This is a surplus of 1,685 dwellings over the requirement, representing a 9.5% flexibility. As the Inspector's Matters, Issues and Questions notes the reference to a 10% flexibility of 1,778 dwellings at Table 2 is therefore incorrect.
- 1.2. Since the submission of the Local Plan for Examination, the Leicester and Leicestershire HMA authorities have published the Statement of Common Ground (SoCG) relating to Housing and Employment Needs. This identifies unmet needs of 18,700 dwellings from Leicester City over the period 2020–2036. The SoCG agrees a distribution of this unmet need, with Charnwood being apportioned 7% of this unmet need – an additional annual requirement of 78 dwellings a year, increasing the annual requirement to 1,248 dwellings.
- 1.3. As the extent of unmet need and its apportionment to Charnwood is available in good time ahead of the Examination Hearing sessions, there is absolutely no reason why the Examination process cannot consider the necessary modifications required to the plan to enable it to meet this revised housing requirement.
- 1.4. The Submission Plan, quite rightly, sought to provide for a degree of flexibility to deal with changing circumstances. This amounted to a flexibility of some 9.5%. For the reasons explained in our representations on the Submission Draft Plan, and response on Matter 1, provision should be made for a flexibility allowance of at least 15%.
- 1.5. Against the new housing requirement of 19,024 dwellings, this will require provision for an additional 1,900 dwellings. As the submitted plan provides for some 19,461 dwellings, additional provision should be made for some 1,465 dwellings.
- 1.6. We also commented in response to Matter 1 and the Inspector's Questions that the plan period should be extended by 1 year to 2038 to ensure that it plans for at least 15 years post adoption in line with the NPPF. This would mean an overall requirement 2021–2038 of 20,213 dwellings. If the plan period is extended by one year and a flexibility allowance of 15% applied, this would mean the following additional housing requirement as set out in Table 1 below.

**Table 1: Additional Housing Provision Required**

<b>Housing Provision 2021-2038</b>	<b>Dwellings</b>
Local Housing Need 1,189 dwellings pa x 17 yrs	20,313
Including 15% flexibility allowance	23,360
Submission Draft Plan Housing Provision	19,461
Additional provision required	3,899

- 1.7. There is no reason why, through the Examination and subsequent Main Modifications process, the plan cannot now be amended to make appropriate provision to reflect the revised housing requirement accommodating Leicester's unmet need and a suitable level of flexibility to deal with uncertainty.
- 1.8. A range of sites have been assessed through the Sustainability Appraisal with suitable and deliverable opportunities available in accordance with the spatial strategy and its focus of development on the main urban areas. Land south of Watermead Way offers an opportunity to deliver 500 dwellings to help address this additional requirement, in a highly sustainable location on the edge of the main urban centre of Loughborough, offering wider benefits in terms of biodiversity enhancements and improvements to recreational access to the Charnwood Forest.

## **Issue 2 – Will the Plan Provide for a choice and mix of housing to meet the needs of different groups in the community?**

### **Policy H2 – Housing for Older People and People with Disabilities**

- 1.9. In our representations on the Submission Draft Plan we commented on Policy H2, Housing for Older People and People with Disabilities. Analysis of the available evidence in the Housing Needs Assessment Update Report 2021 indicates that there is not sufficiently robust evidence of a local need to seek to apply the optional standards for accessible and adaptable homes. In addition, the reference to an 'appropriate proportion' of affordable homes to meet M4(3) standards is not clear.
- 1.10. From a review of the Council's Viability Study, it does not appear that the viability implications of the proposed policy requirement have been properly considered.

### **Policy H3 – Internal Space Standards**

- 1.11. For Policy H3, Internal Space Standards, the proposed inflexible approach is likely to impact on affordability and customer choice. The Council has again failed to provide sufficient local evidence of need or viability to justify the policy.



#### **Policy H4 – Affordable Housing**

- 1.12. In terms of Policy H4, we commented in our representations on the Submission Draft that the late change to include First Homes in the affordable housing mix has not been subject to a sufficiently robust viability assessment.

#### **Policy H6 – Self Build and Custom Housebuilding**

- 1.13. In our representations on the Submission Draft Plan we pointed to the Blaby Part 2 Local Plan Examination where the Inspector considered the issue of self and custom build housing units on larger developments. In that instance the Inspector concluded that the requirement was not justified by the available evidence, there were potential viability issues and potential negative consequences for the provision of affordable housing. These issues apply equally to the proposed policy for Charnwood.



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