

## 1. Background

- 1.1. This hearing statement has been prepared on behalf of Redrow Homes East Midlands (“Redrow Homes”).
- 1.2. Redrow Homes are working in partnership with owners of the land off Ratcliffe Road, Sileby, which is not identified for development in the submitted version of in the Charnwood Local Plan.

## 2. 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?*

- 2.1. Paragraph 2.9. on page 19 of the draft local plan states that ‘evidence’ shows that there does not need to be an uplift in housing numbers for economic circumstances. It is not clear what this evidence is and how it should therefore justify an increase in numbers beyond the standard method which the PPG states should be used as a starting point.
- 2.2. The tables heading each of chapters 2-5 of the Sustainability Appraisal all demonstrate a clear economic benefit to an increase in housing figures, whilst this needs to be balanced against other factors, economic growth is rarely discussed in the justification for strategy with greater emphasis on avoiding environmental harms or negative impacts from higher housing strategies. Economic sustainability is one of the three strands of sustainable development with equal weighting to that of environmental sustainability.

*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? affordable housing?*

- 2.3. The proposal for 19,491 dwellings provides for an approximate buffer of around 10%, a figure which is close to the minimum expected and does not present as very positive for the purposes of plan making (NPPF para 35). Given the high proportion of homes that are to be delivered through SUEs – 8,355 – the lack of deliverability demonstrated at these sites to date and the undersupply of housing in recent years, it would indicate that a figure above the minimum would be more appropriate. We consider the buffer should be around 15% which could be calculated as an additional c.3,800 dwellings over the Local Housing Need figure.

Matter 4 – Assessment of housing need, the housing requirement and mix and choice of housing

Redrow Home Limited  
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2.4. We consider the plan period should be to 2038 being 15 years from potential adoption of the Local Plan in 2023. This would require a main modification comprising consideration of housing growth and sites selection.

*Q. 4.8 Are the requirements in Policy H2 for M4(2) and M4(3) standard homes justified having regard to the factors listed in the Planning Practice Guidance and the evidence in the Housing Needs Assessment (EB/HSG/1)? Is it clear what is meant by an 'appropriate proportion' in relation to the requirement for M4(3) homes? Has the impact on development viability been assessed and what was the outcome?*

2.5. Given the impact upon build cost associated with meeting Building Regulations M4(2) and M4(3) clarity is needed with regard to the 'appropriate proportion' and this should be backed up by clear assessment of development viability and with real world evidence.

2.6. Designing for disability is extremely important but it needs to be proportionate and should not hinder the achievement of sustainable development.

*Q. 4.9 Is there an identified need to apply the nationally described space standard taking account of the evidence about the size and type of dwellings being built in the area? Where is that evidence and has the impact on development viability been assessed?*

2.7. There is no justification to limiting the exemption to nationally described space standards to just the affordable housing element, giving no flexibility to other types of housing outside of this definition.

*Q. 4.11 Does the viability evidence support the percentages of affordable housing sought on greenfield and brownfield sites and the threshold of 10 or more dwellings at which they will be required?*

2.8. The current percentages are given as fixed figures and we believe that a more appropriate cause of action would be to treat these as 'up to X%' as this would result in greater flexibility in the case of individual sites that come forward.

*Q. 4.14 Are the policy thresholds justified by the viability evidence and is it clear how many plots would be sought on sites of 10 to 250 dwellings? What evidence is available to demonstrate the level of interest in self and custom build dwellings?*

2.9. No evidence has been produced to justify the of provision Self-build and Custom Housing, which should as a starting point use the locally held register of interest in the borough as required under Self-build and Custom Housebuilding Act 2015.

2.10. There is no clear viability evidence to support the provision of a minimum of five serviced plot on developments of more than 250 dwellings and how the sliding scale of additional units would be justified in developments up to 250 in size.

2.11. The restriction of 12 months minimum marketing for plots is very restrictive and could lead to failure to deliver market housing, especially on smaller sites.