



Charnwood Local Plan Examination Statement

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

Tuesday 12 July 2022

On behalf of **Barwood Development Securities Ltd**



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1 Introduction

1.1 Summary of Our Objections to the Draft Submission Plan

- 1.1.1 This Statement has been prepared by Stantec on behalf of Barwood Development Securities Limited ('Barwood Land'). Barwood Land has an interest in the site known as Phase 2 land at Peashill Farm, Ratcliffe Road, Sileby. The site is the subject of an outline planning application for residential development of the site for up to 175 dwellings, as an extension to the Peashill Farm Phase 1 development, construction of which is already well advanced.
- 1.1.2 Our Regulation 19 response to the Plan, submitted in August 2021, found the Plan to be unsound, for reasons which can be summarised briefly as follows:
- Policies DS1 and DS2 do not provide sufficiently for the housing needs of the borough and the Leicester urban area; and
 - The above site should be allocated under Policy DS3 of the Plan in place of or in addition to some of the sites in Sileby/Cossington which are presently proposed as allocations.

2 Response to the Inspector's Questions: Matter 4

2.1 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?

- 2.1.1 We consider that the Plan's housing requirement should increase from the figure of 17,776 dwellings in Policy DS1 to a minimum of 21,246 dwellings to allow for:
- An additional 1,248 dwellings arising from Leicester City's unmet need for 2020-2036 (16 years x 78 dpa = 1,248); and
 - An additional 2,222 dwellings (2 years x 1,111 dpa – the current applicable annual housing need for Charnwood under the Standard Methodology) arising from the extension of the Plan period to 2039, as we proposed and explained under Questions 1.8 and 1.21 regarding Matter 1.
- 2.1.2 Whilst Policy DS1 makes provision for 19,461 dwellings, this would leave a shortfall of 1,785 dwellings which would need to be provided for by means of additional housing allocations.
- 2.1.3 We consider that the distribution of new homes set out in Policy DS1 does not represent the most sustainable or deliverable pattern of development or means of accommodating housing needs, as is required by paragraph 11a of the NPPF. Policy DS1 is unsound for the following reasons:
- the housing requirement figure of 17,776 dwellings is too low, as described in 2.2.1 above;
 - the Plan period should be extended to 2039, as we explained under question 1.21 of Matter 1. A greater number of new homes would then need to be provided and additional housing sites allocated. This would have advantages in meeting housing needs more comprehensively and also ensuring greater flexibility and control over the supply of housing sites, thereby avoiding the Plan becoming quickly out of date, due to the absence of a 5 year housing land supply;
 - in this context, we note from the Council's published 'Charnwood Five Year Housing Land Supply: 31st March 2022' that there is currently a deliverable housing supply of only 3.04 years, in conflict with paragraphs 60 and 68 of the NPPF. We also seriously question the optimistic delivery trajectory which finds (in Appendix 2 to the Plan) that, if completions from proposed allocations are included, there would actually be a housing supply of 5.37 years. In particular, we consider that the delivery trajectories shown for the three SUEs are wholly unrealistic and over ambitious, noting that construction work on these sites has only just commenced and all three require major infrastructure to be provided ahead of housing completions. Consequently, we submit that the Plan should allocate additional sites, particularly those for up to around 200 dwellings which can deliver housing early in the plan period, such as our client's site at Sileby;
 - the Service Centres, including Sileby, have a scale, population and range of services and facilities such that more than 14% of all new homes should be located there; and
 - by definition, the 'other settlements' and 'small villages and hamlets' are less sustainable, being much smaller and having fewer facilities and services, therefore the proposal in Policy DS1 that they should accommodate over 5% of all new homes (some 950 dwellings) is flawed and this proportion should be significantly reduced or removed.

Question 4.2: Is the housing requirement of 60 dwellings for the Wymeswold Neighbourhood Plan justified and what evidence has that figure been based on?

2.1.4 No comments.

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?

2.1.5 See 2.1.1 – 2.1.2 above.