

8 November 2023
Response on Behalf of Redrow Homes - 081123_Final



I Kemp
Programme Officer
Charnwood Local Plan Examination
By email only to:
idkemp@ickoud.com



Dear Mr Kemp,

Charnwood Local Plan 2021-37 Examination – Representations in respect of the additional information received 26th September 2023

I would be grateful if you could accept this response on behalf of Redrow Homes in respect of the consultation of the additional documents submitted in evidence to support the Charnwood Local Plan 2021-37 (Sept-Nov 2023).

Plan period

The proposed plan currently spans the period 2021 to 2037, however adoption of the plan appears still to be some way off into 2024 at the earliest and so would only cover the next 13 years from adoption, short of the 15 year minimum period in the NPPF (para 22). We believe that at least an additional two years should be added to the current plan period in order to make the plan sound. This would mean that an additional 2,600 units (1,189 x 2 + 10% buffer) for allocation should be found in order to meet the minimum guidelines. The Council should adopt a higher buffer of at least 10% which is a common figure in other adopted Local Plans in order to ensure delivery meets the identified needs of the Borough.

Given the potential complexity and the assumed requirement for additional hearing sessions for such a significant addition it could be reasonably argued that three years should be added to the plan period, or 3,900 units of housing in total, anticipating a 2025 adoption of the plan. Given the current LDS which is dated March 2023 anticipated that the plan would be adopted in September of 2023, it is considered that a realistic and well evidenced new LDS would help the inspectors reach a decision on the length of the plan period to be imposed.

For these additional units the LPA could review the existing submissions and apply the current strategy of Leicester and Loughborough, large town and then service towns. The Council should be looking to spread the additional housing in line with the Settlement Hierarchy and this should include allocations within the Service Centres – particularly those which the Council have found to be sustainable through previous permissions. The service centres and specifically the more sustainable ones with respect to their proximity to the urban centres and existing or future sustainable modes of transport, could provide a higher proportion of deliverable sites.

the Council should be looking to spread the additional housing in line with the Settlement Hierarchy and this should include allocations within the Service Centres – particularly those which the Council have found to be sustainable through previous permissions?

The 'Land off Ratcliffe Road' Site is in a very sustainable location, being adjacent to the service town of Sileby and in a location found to be very sustainable for housing development by both the council and the inspectorate



in the last 2-3 years (Peashill Farm and Cossington Road appeal). The Site has no technical constraints or landscape designations and also benefits from a full layout plan, two collaborating owners and an option with a reputable developer making it a very deliverable site with a number of positive benefits which would significantly benefit the settlement and the local area – such as a local centre and school. The site is also proximately close to Leicester and Sileby itself benefits from a railway station with good links to Leicester and Loughborough and the wider rail network. The land is being promoted by Redrow, a nationally renowned housing builder, and is available and deliverable.

County Council - Transport Strategies to Enable Growth in the Borough of Charnwood (Exam 75) and Viability Report (Exam 76)

The County Council have prepared a draft strategy which includes around £183million of commitments which would need to be funded through contributions from development in Charnwood Borough. This therefore intrinsically links the strategy to the level of development in the borough. At the same time the viability report submitted and prepared by Aspinall Verdi summaries the educational infrastructure costs required for primary, secondary and post 16 education in the borough at over £140m. This results in a total requirement of over £323m of infrastructure spending to be secured.

The Aspinall Verdi report however finds that only a total of circa £200m maximum can be raised via the commitments in the emerging local plan. This leaves a significant shortfall of over £120m, which whilst there might be some alternative sources of funding it would be very unlikely indeed that this sort of figure could be achieved through alternative. There is therefore a funding gap. Added to this gap, which is reliant on raising the funds through emerging allocations, a good proportion of the emerging plan sites have already had planning approval and whilst these sites will have been subject to S106 agreements they pre-date the current infrastructure demands and might not secure funding at the level required by the draft strategy for transport infrastructure with no re-course to re-coupe further funds.

The viability work does not take into account the real world nature of commercial agreements with landowners who have to achieve a base line price per acre which is often in excess of that in the viability report. Rather than forcing the base line values down, the impact of the proposals as they stand with high S106 commitments will be to reduce the land available for development as landowners pause in anticipation of a future when their need for a minimum value will be met – rather than accepting lower values in the short term.

There is a risk that should the County try and insist on contributions through future applications that are in excess of those found to be viable by Aspinall Verdi that would place the Borough and Applicants in a difficult situation. This in turn could detrimentally impact on the delivery of affordable housing in the Borough should a viability assessment be required. The allocation of additional sites in the Borough would help to ensure that additional affordable housing is delivered in the Borough.

Additionally, Charnwood are not proposing and adopting their own policy outlining a per dwelling contribution towards highways Infrastructure costs. The implication being that a future SPD would have to be proposed based on the viability evidence and subject to public consultation to specify the level of contributions. This is at odds with NPPF para 34 which states that:-

“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”

This is re-enforced by the PPG which also makes the point that polices for planning obligations should be set out in plans and examined in public. By not therefore including a specific policy on this in the local plan and deferring to either the OCC planning obligations policy or a future SPD the plan would be at odds with the National Planning Guidance.

Charnwood Additional Housing Supply Update September 2023 (Exam 56 a)

There are concerns about the process of increasing the yields from existing sources of supply are detailed from page 6 of the report. Windfall sites for instance have been based on the last few years of windfall in the borough, however, in this time the borough has not benefitted from an up to date local plan or five year land supply and therefore has been subject to a higher proportion of windfall sites via the presumption in favour of sustainable development. In the five years following the adoption of the local plan this will not be the case and therefore to base the future figure whilst including this data will cause it to be unrealistically high. This figure should be reduced accordingly and further sites sought to make up the resulting shortfall.

The changes to allocated sites which concludes that an additional 504 units can be achieved through the increase of density or increasing the size of the plot of land/boundary is problematic. The plan was submitted on the basis of the original densities and boundaries and to change these piecemeal during the examination process it is hard to see as a sound approach to plan making. It's evident from a review of the applications that have come forward so far on allocated sites that there is actually a shortfall when compared to the allocation numbers, which undermines the Council's strategy and the finding of the SA Addendum. Each site needs to be considered on its own merits, taking into consideration land requirements for POS, landscape mitigation and BNG that will result. It cannot simply be the case that each allocation can accommodate an increase in numbers without fully assessing the impact. We would also like to see the up to date figures that have been applied for or approved on the sites in question in an update to the published trajectory.

As an example of sites which have been subject to change HA33 and HA35 are in part on very severe slopes and subject to the flood plain and far from increasing the density of housing on these sites it is our experience that sites such as this would in fact find it hard to achieve the original stated densities much less an increased one.

Far from additional units being achievable as concluded in Exam 56 it is apparent that when developers are having to submit acceptable planning applications it is resulting in lower than originally anticipated figures. Therefore the whole strategy of increasing densities for sites must be called into question and should at very least be hedged with an expanded buffer of perhaps 20% of the overall housing figure in order to meet the needs of the Borough during the plan period. Adding a 20% buffer to three additional years of 1,189 would result in a required uplift of 4,300 units.

Conclusion

The Borough should be commended for including the agreed unmet need for Leicester in the plan, once the agreement was made relatively early in the examination process. However, by electing not to adequately identify housing levels for the entire plan period by neither extending the plan period to 2039/2040 or extending the buffer suitably, the plan in its present form cannot be considered sound by the inspectors. The additional work to find housing by means of windfall sites and increased densities/boundaries from a selection of existing allocations is questionable and not robustly evidenced. A full review of the submitted sites, including those already discounted, is long overdue to identify the 2,600-4,300 homes that are needed in the Borough for the plan to be found sound.

These topics and the additional reports provided on the 26th September are of great consequence and there should be a further opportunity to discuss these matters at hearing sessions which we would strongly advocate for given the level of change proposed at this point in the plan examination.

I would be grateful to receive acknowledgement of receipt of this response and that this been provided to the Planning Inspectors

Please do not hesitate to contact me with any queries on this.

Yours sincerely



David Bainbridge MRTPI
Planning Director

cc. Redrow Homes, Silverfox Development Consultancy