

For and on behalf of
Lagan Homes

**Charnwood Local Plan
Examination in Public
Supplementary Matters, Issues & Questions
Matter 1: Duty to Cooperate and Other Legal Requirements**

Land at Gorse Hill, Anstey

**Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
Sheffield**

January 2023



Prepared by:	Megan Wilson BSc (Hons) MSc MRTPI CIHCM Associate Director
Checked by:	Adam Place MRTPI Associate Planner
Approved by:	Jon Goodall MA (Cantab) MSc MRTPI Director
Date: January 2023	Office: Sheffield

Strategic Planning Research Unit

[Redacted text block containing three columns of blacked-out information]

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

CONTENTS	PAGE
1.0 Introduction.....	4
2.0 Issue 3 – Whether the Plan has been prepared in compliance with other legal requirements.....	5

1.0 INTRODUCTION

- 1.1 This response to the supplementary Matter 1 Matters, Issues and Questions (MIQs) in respect of the Charnwood Local Plan (CLP) 2021-37 Examination has been prepared by the Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd. SPRU have been instructed to appear at the Examination on behalf of Lagan Homes.
- 1.2 This hearing statement should be read alongside previous representation to the Regulation 19 consultation (PSLP/162), submitted by Geoffrey Prince Associates Ltd on behalf of Cawrey Homes, in respect of the Local Plan and should be considered in the context of support for the Local Plan. The site in which these representations related, is now being promoted by Lagan Homes.
- 1.3 DLP submitted Matter 1 Hearing Statements on behalf of Lagan Homes in June 2023 and attended the hearing session on behalf of the client. DLP's previous submissions also address outstanding questions under this Matter to be considered as part of the resumed Hearings. DLP also prepared written submissions and appeared on behalf of Lagan Homes and other clients in respect of Matter 10 (Unmet Housing Needs).
- 1.4 In response to the current shortfall in supply, Lagan Homes have submitted an outline planning application at land at Gorse Hill, Anstey for up to 80 dwellings (P/22/2132/2). Lagan Homes are a privately owned SME Housebuilder based in Banbury and operating across the Midlands. Promotion of the site responds to the financial and operational barriers typically faced by SME housebuilders in terms of securing opportunities for development on larger allocated sites. By extension the site would increase and diversify opportunities for delivery.
- 1.5 The application was validated by the Council on 20th December 2022 and demonstrated the developer's commitment to bringing the site forward. The supporting evidence, submitted as part of the application, demonstrates that there is no technical impediment to the development of the subject site for residential purposes.
- 1.6 This statement outlines Lagan Homes' comments in respect of the supplementary Matter 1, with responses to the Inspector's MIQ's (Matter 1) set out below.

2.0 ISSUE 3 – WHETHER THE PLAN HAS BEEN PREPARED IN COMPLIANCE WITH OTHER LEGAL REQUIREMENTS

1. ARE ANY ADJUSTMENTS TO THE PLAN PERIOD (2021 – 2037) NECESSARY TO ACCORD WITH NPPF PARAGRAPH 22 WHICH STATES THAT STRATEGIC POLICIES SHOULD LOOK AHEAD FOR A MINIMUM 15 YEAR PERIOD FROM ADOPTION, HAVING REGARD TO THE DELAYS IN THE EXAMINATION PROCESS?

- 2.1 We support extending the Plan period until 2038, as stated in paragraph 4.2 of our Matter 1 Statement. Because of the delays in the Examination process caused by Leicester's unmet needs, the Local Plan period will now last 14 years after adoption. Strategic policies should look ahead at least 15 years, according to national policy (paragraph 22 of the NPPF21).
- 2.2 Beyond this bare minimum, paragraph 22 makes it clear that it may be acceptable for Plans that contain the allocation of large-scale strategic sites, such as the SUEs suggested in this Plan, to seek to prolong the Plan period even further.
- 2.3 Regardless, in order to comply with the NPPF, the Council should extend the Plan duration until at least 2021-2038. It is, therefore, necessary as part of the requirements for soundness for the Plan to demonstrate sufficient provision to meet the minimum housing requirement for a period of 15 years from adoption together with measures to address shortfall from the base-date in 2021.
- 2.4 The provision for a minimum 15 year plan period is considered achievable broadly within the context of the strategy within the submission version Plan. Satisfying this element within national policy is consistent with ensuring that the strategy provides an effective and positively prepared response to address long-term requirements but this should be viewed within the context of the opportunity to support early delivery and a boost to supply upon adoption. This is particularly important in the context of worsening affordability and recent delivery being substantially below levels of minimum annual local housing need.
- 2.5 In other words, provision for an additional year in the plan period would reasonably strike a balance between different elements of sustainable development. Firstly this reflects expected additional provision partly comprising 'rolling forward' residual capacity on larger sites beyond the end of the current proposed plan period in 2037. Secondly, addressing necessary modifications to the housing requirement to provide for Leicester's unmet needs (and worsening affordability) supports (by the Council's own admission) increasing and maximising the opportunities for development on sites proposed for allocation in the submission version Plan. Our client submits that this process also supports maximising sustainable opportunities for development adjacent to the Leicester Urban Area.
- 2.6 Consistent with the Inspectors' conclusions in EXAM55 there is a substantial benefit to consider the potential increase to supply as a result of this process positively and flexibly. Where opportunities exist to increase supply over-and-above the minimum additional contributions towards unmet needs it is self-evident that this demonstrates that provision for an additional year of the plan period is appropriate and achievable. This, for example, includes enhancing the choice of supply on small sites and opportunities for SME housebuilders in-line with NPPF2021 paragraph 69 (see response to Matter 4 Q4.4).
- 2.7 Within this context additional large-scale strategic sites are unlikely to be necessary to meet little if any of the provision required for just one additional year of the plan period using the proposed housing requirement. Making provision for a minimum 15-year plan period would reinforce rather than undermine the flexibility of the Charnwood Local Plan to respond to changing circumstances and would complement and potentially reduce the scope of requirements for a wider review of strategic policies under Policy DS2 (for example in relation to providing for additional unmet needs).

**2. IS AN UPDATE TO THE LATEST LOCAL DEVELOPMENT SCHEME (EXAM 34)
NECESSARY TO PROVIDE AN UPDATED TIMESCALE FOR PLAN ADOPTION?**

2.8 No response.



BEDFORD

Planning / SDD / SPRU

bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU

bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD

nottingham@dlpconsultants.co.uk

LEEDS

Planning

leeds@dlpconsultants.co.uk

LONDON

Planning

london@dlpconsultants.co.uk

MILTON KEYNES

Planning

miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU

sheffield@dlpconsultants.co.uk



RTPI

Chartered Town Planner

