

For and on behalf of
Lagan Homes

**Charnwood Local Plan
Examination in Public
Supplementary Matters, Issues & Questions
Matter 2: Vision, Objectives, Sustainable Development and the
Development Strategy**

Land at Anstey

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1.0 INTRODUCTION

- 1.1 This response to the supplementary questions relating to Matter 2 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 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 previously provided a written statement only in relation to Matter 2 on behalf of Lagan Homes. This statement should be read alongside our previous submission. DLP's previous submissions 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 Spatial Strategy, with responses to the Inspector's supplementary MIQ's (Matter 2) set out below

2.0 ISSUE 3 – THE DEVELOPMENT STRATEGY

1. DOES THE DEVELOPMENT STRATEGY SET OUT IN POLICY DS1 REPRESENT A ROBUST AND APPROPRIATE APPROACH FOR THE DISTRIBUTION OF HOUSING, EMPLOYMENT AND OTHER DEVELOPMENT IN THE LONGER TERM , HAVING REGARD TO THE INSPECTORS' INITIAL FINDINGS (EXAM 55) IN RELATION TO CHARNWOOD'S APPORTIONMENT OF LEICESTER'S UNMET NEED FOR HOUSING AND EMPLOYMENT LAND?

- 2.1 The evidence base for the submission Plan broadly demonstrates that the strategy used to distribute growth in accordance with Policy DS1 is justified and represents an appropriate and sustainable growth option. However, the necessity of provision towards Leicester's unmet needs as outlined in EXAM55 reinforces the justification to increase and support flexibility in provision immediately adjacent the Leicester Urban Area.
- 2.2 This is consistent with the submissions at Paragraph 2.15 of the original Matter 2 Statement on behalf of our client. The requirement for provision towards unmet needs, and by association the greater scope for a shortfall in supply against needs, also reinforces the rationale for the provisions in Policy DS1 as submitted to provide flexibility in application of the development strategy where there is a deficit against the five-year requirement.
- 2.3 It is important to note the how the strategy within DS1 responds to the relevant increase in the housing requirement should be reflected in consequential changes to Table 5 in the submission version Plan. Pending any changes to committed supply it is predominantly 'New Homes' identified as part of the Plan's provisions that give effect to the strategy and addressing the deficit against housing needs.
- 2.4 The "number of dwellings" that are predicted to be developed in each of the major settlements, groups of settlements, and urban areas during the course of the Plan period are listed in the table in Policy DS1. This should be updated to reflect the Inspectors' conclusions in regard to accommodating Leicester's unmet housing need and should explicitly express housing requirements as a minimum figure.
- 2.5 Policy DS1 just offers a grouping required for all settlements and does not attempt to break down the 2,747 (928 commitments and 1,819 allocations) to be delivered at the Service Centres by settlement. This needs to be read alongside Table 5. The level of additional allocations/residual addressed by the Plan in relation to accommodating an increased in the housing requirement should be made clear as part of modifications. This is in order to reflect that it is predominantly modification of the distribution of new homes that boosts supply and ensures a contribution towards unmet needs.
- 2.6 This Statement considers that that it is possible to demonstrate that this is achievable broadly within the context of the strategy as submitted but the operation of Policy DS1 should ensure that it remains consistent with supporting additional contributions towards unmet housing needs in locations with the strongest functional links to Leicester.
- 2.7 Our client considers that the identification of additional land should be considered in relation to addressing an increase in the housing requirement but considers that this could be achieved through a relatively short pause in plan-making process to consider opportunities for additional supply consistent with the strategy in Policy DS1 as submitted. This would also enable the Plan to ensure consistency with national policy in NPPF2021 in terms on enhancing the provision of small sites and opportunities for SME housebuilders (see response to Matter 4 Q4.4).
- 2.8 If the identification of additional sites occurs either as a result of this Examination or subsequently a Plan review, the Council should conduct a separate exercise that considers the sustainability and impact of development in the settlements closest to Leicester, namely

within the LUA and Anstey. Any such assessment should take into account the 600 houses and Primary School planned for Anstey as part of allocation HA43, as well as the provision in the old Green Wedge at Glenfield under HA12 and HA13.

- 2.9 According to the evidence presented by the Council, the justification for a greater proportion of new dwellings being delivered in Service Centres, as opposed to the hybrid approach, is related to the need for new or expanded Primary Schools, as well as a desire to avoid smaller settlements having to accommodate more significant levels of growth. The delivery of larger-scale expansion and accompanying infrastructure is fundamentally supported within the context of Anstey and Glenfield. This is justified given their functional relationship with Leicester and the development originally proposed in the submission version Plan reinforcing their characteristics in terms of sustainability. This view is supported alongside acknowledgement in the SA that there remained capacity for additional growth below that considered to cause significant adverse effects.
- 2.10 The provisions of Policy DS1 already anticipate that there might be continued shortfall against the relevant requirements and the necessity of these is reinforced by recognition of the Plan's role in providing for unmet needs.
- 2.11 Land adjacent to the LUA should be specifically reflected within the scope of these provisions as a result of the Inspectors' conclusions in EXAM55. This is particularly relevant given worsening affordability and the reality that Leicester's unmet needs exist *now*. In terms of the scope for the strategy in Policy DS1 to provide a buffer in provision against minimum needs this is inevitably placed under pressure as a result of an increase in the housing requirement and subject to the ability to identify an increase in supply. On behalf of our client, we submit that the proportion of provision within the LUA should not be eroded as a result of the reduction in the extent of any buffer. This supports the rationale to seek opportunities for additional allocations in this part of the Plan Area or instead make express provision for flexibility to increase supply in circumstances of a land supply deficit.
- 2.12 A singular concentration on urban areas, particularly the three current SUEs, would introduce a variety of hazards, including market absorption, delivery delays, and high upfront expenditures. As a result, it is reasonable to concentrate growth on a range of sites providing flexibility and choice with a focus upon the Leicester Urban Area (LUA), Loughborough/Shepshed, and the Service Centres.
- 2.13 When deciding the location for growth in conditions when there is a shortfall versus the minimum five-year requirement for deliverable housing land supply and unmet housing needs, the existing development plan may work to prevent otherwise sustainable development from occurring. For example, the Council's own evidence base recognises Anstey and Leicester's fundamental linkages and outstanding connectivity. If the development strategy were strictly followed, suitable opportunities in the settlement might not arise if the percentage of growth assigned to the tier was exceeded, despite the ability to deliver growth that reduces the need to travel while providing access to a diverse range of services and facilities in Leicester.
- 2.14 As a result, greater flexibility under Policy DS1 should be introduced to allow for a departure from the tight application of the spatial strategy in cases when an adequate supply of sites cannot be proved.

2. IS ANY FURTHER SA TESTING OF THE OPTIONS FOR THE LEVEL AND DISTRIBUTION OF GROWTH NECESSARY HAVING REGARD TO THE INSPECTORS' INITIAL FINDINGS (EXAM 55) IN RELATION TO CHARNWOOD'S APPORTIONMENT OF LEICESTER'S UNMET NEED FOR HOUSING AND EMPLOYMENT LAND?

- 2.15 On behalf of our client, we maintain that the allocation of additional sites is required and

should be supported to address an increase in the housing requirement. However, we consider that the SA, save for some anomalies set out in paragraphs 3.1 and 3.4 of our Matter 2 statement, demonstrates that the SA testing of options was sufficient. As outlined under Questions 1.17 and 1.18 of the Matter 1 Statement originally submitted on behalf of our client existing testing confirms higher potential in the capacity for growth without significant adverse effects at Anstey/Glenfield.

- 2.16 Multiple scenarios, including a focused urban approach, a dispersed approach, and a new settlement strategy, were examined through the SA and took into account a spectrum of development trends throughout the Borough and had regard to the strategic relationship with Leicester. Future iterations of the SA might look to reinforce the positive effects of meeting needs in accordance with these links.



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