

Charnwood Local Plan Examination

For Hollins Strategic Land LLP | PSLP/366

Matter 4 – Vision, Objectives, Sustainable Development and the Development Strategy



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1. Introduction

- 1.1 Emery Planning is instructed to attend the Examination into the Charnwood Local Plan (2021 – 2037) on behalf of Hollins Strategic Land (hereafter referred to as 'HSL'). HSL's specific interest is the land north of Melton Road, Queniborough which is proposed for allocation (Site Ref HA65) under Policy DS3. We have previously submitted a Hearing Statement on Matter 4 and we due to attend the hearing session in July. We focus in this Statement to the Supplementary Questions and do not repeat that Statement here as requested in the Guidance note.



2. Supplementary Questions

1. In the light of the Inspectors' findings (Exam 55) that the minimum local housing need for Charnwood is 1,189 dwellings per year, should the housing requirement in Policy DS1 of 1,111 dwellings per year be increased to 1,189 to ensure that the Plan has been positively prepared? Is there any justification for a lower or a higher figure?

- 2.1 Yes, the requirement in Policy DS1 should be increased from 1,111 dwellings to 1,189 dwellings. The main reason why it would not change is if there is not the deliverable and developable land available to deliver the minimum local housing need following the process set out in the PPG¹. Given that the LPA has agreed to their apportionment of the unmet housing needs we have proceeded on the basis that there is deliverable and developable land available to meet the housing need figure.
- 2.2 On our client's site we proposed an increased capacity on the site to 85 dwellings to the LPA in August 2022, although through further work as part of an application which has been submitted, we consider the capacity of the site to be 99 dwellings.

2. Pending any changes to the housing requirement in Policy DS1 to accommodate Charnwood's apportionment of Leicester's unmet housing need, is there a sufficient buffer between the minimum housing requirement in Policy DS1 and the overall supply during the Plan period to ensure that there is a reasonable prospect of the housing requirement being met? In the event that the supply needs to be increased to secure an appropriate buffer, what sources of supply would help to deliver this? Are any new site allocations likely to be required? If so, what would be the process and likely timescale for identifying sites?

- 2.3 Based on Policy DS1 as currently drafted, the total requirement is 17,776 dwellings with a supply of 19,469 dwellings. This equates to a buffer of 9.5%. As set out in our previous Hearing Statement, after taking account of the existing commitments from the Core Strategy, the Plan seeks to make provision for a further 7,173 homes over the plan period to 2037. In our experience delays and non-implementation are inevitable so the recognition of the need for flexibility is welcomed.
- 2.4 Our representations at Submission stage questioned whether that level of flexibility, which equates to an additional 9.5% dwellings per annum was sufficient. In questioning the level of flexibility, we referred to the report to the Communities Secretary and to the Minister of Housing and Planning in March 2016. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the

¹ Paragraph: 001 Reference ID: 2a-001-20190220



release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework. The subsequently published Framework or the PPG does not provide any specific buffer to apply and the LPA has performed well under the Housing Delivery Test, so we consider that the buffer of at least 9.5% in the circumstance should continue.

- 2.5 Should the requirement in Policy DS1 be increased to 1,189 dwellings per annum, then the total requirement would be 19,024 dwellings. The total supply of 19,469 would then only equate to a buffer of 445 dwellings (3%) which would not be sufficient, in our judgement, to ensure that the requirement would be met.
- 2.6 As to additional sources of supply, that is for the LPA to evidence, but as far as our client's interest (HA65), there is scope to increase the capacity given that an outline planning application for residential development of up to 99 dwellings (Access Only from Melton Road) was submitted in December 2022 and registered on 10th January 2023 (P22/2310/2). That application was prepared with the necessary environmental and technical work so HSL consider that there are additional sources of supply from existing allocations to meet the housing need figure of 1,189 dwellings which is for the LPA to evidence across the Borough.



