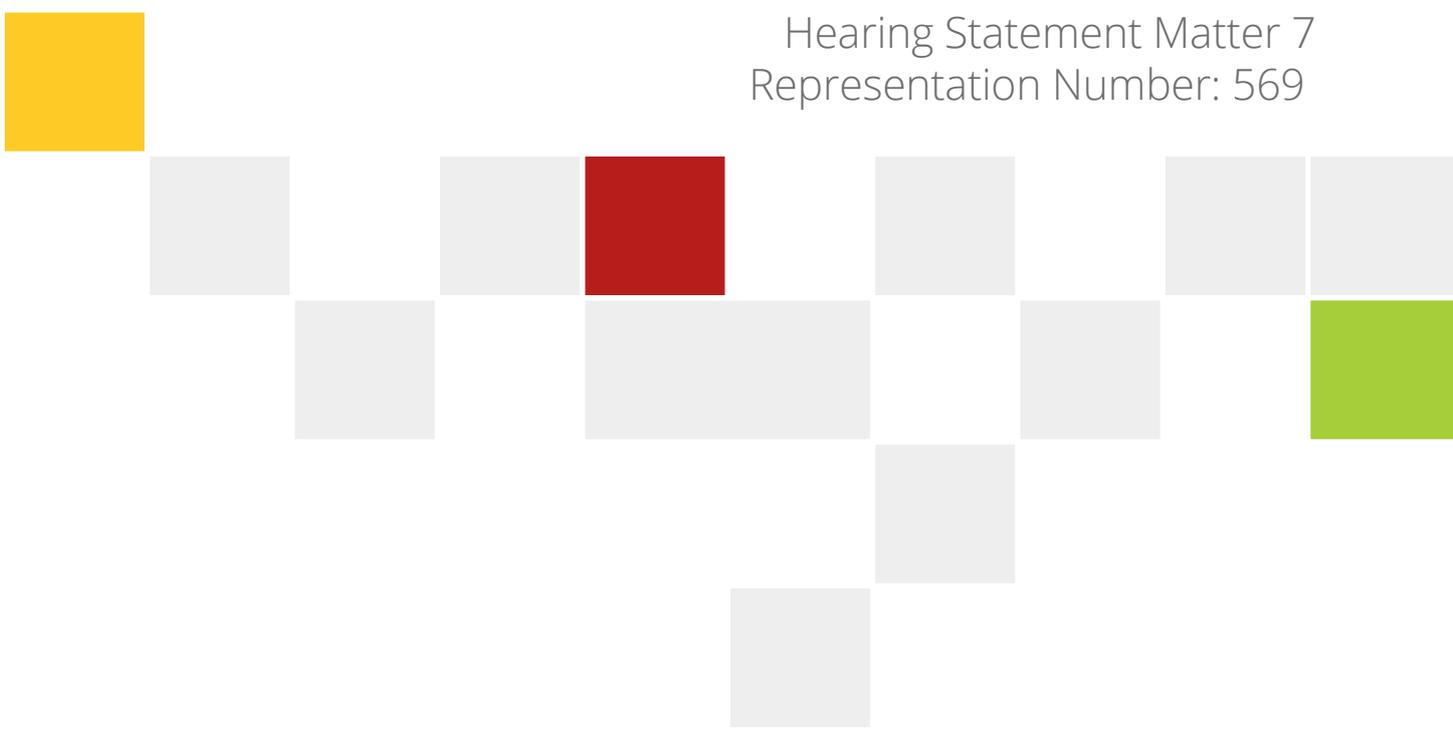


Land at Six Hills, Charnwood

Hearing Statement Matter 7
Representation Number: 569



Boyer

Report Control

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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Knightwood Developments Limited (Representation Number: 569) in regard to the 'Charnwood Local Plan' examination in which the Hearing Sessions are due to recommence.
- 1.2 The below representations provides Knightwood Development's response in relation to Matter 7 – *Housing Land Supply*, as set out within the recent Matters, Issues and Questions published by the Inspector on the 5th December 2022. As per the Inspector's Guidance Note a separate set of representations will be submitted for each Matter wished to be discussed.
- 1.3 These representations are a continuation of the promotion of Knightwood Development's land interest at Land located at Six Hills, Charnwood, Leicestershire.
- 1.4 Paragraph 35 of the NPPF provides the criteria by which emerging Local Plans are found to be 'sound' when subjected to examination; namely that the Local Plan must be positively prepared, justified, effective and consistent with national policy. Our representations are grounded in directing the emerging Local Plan towards those options for housing and economic growth that will result in the emerging Local Plan being found sound, in this regard. It is contended that the options that are not supported in these representations would risk the emerging Local Plan being found unsound, for reasons detailed below.

2. RESPONSE TO MATTER 7 CONSULTATION TOPICS

MATTER 7 – HOUSING LAND SUPPLY

Issue 1: Whether the Plan will provide for a sufficient housing land supply to deliver the planned housing growth over the Plan period and whether a deliverable five year supply of housing will be available on adoption

7.2 Will the Plan identify a sufficient supply of specific, deliverable sites for years 1 – 5 of the Plan period and specific, developable sites or broad locations for growth for years 6 – 10 and where possible for years 11 – 15? What is the estimated total supply of deliverable and developable new housing from the following sources:

- a. Sites with detailed planning permission for 10 or more dwellings**
- b. Sites with outline or detailed planning permission for 9 or less dwellings**
- c. Windfall allowance**
- d. Sites with outline planning permission for 10 or more dwellings**
- e. Site allocations**
- f. Sites on the brownfield register**

- 2.1 As per the housing trajectory 2021-2037 (Exam 11), this shows the pipeline of deliverable sites across the plan period. This includes net completions, allocations and commitments.
- 2.2 The housing requirement as part of this trajectory is set at 1,111 dwellings per annum. Even with this requirement in place this still generates a negative trend of dwellings below the cumulative requirement in the first few years of the plan period.
- 2.3 Comparative to the 5-year housing land supply this sits just within the threshold until the year 2031 whereby it dips below to 4.60 years. This demonstrates sufficient housing in the shorter term however from the 10+ mark this struggles to meet the 5-year housing land supply target.
- 2.4 Within the Housing and Economic Needs Assessment (HENA) Housing Distribution Paper (Exam 45) it demonstrated the projected delivery across the Charnwood Borough through to 2036.

LPA	Commitments	Allocations in Adopted Plans	Emerging Allocations in Draft Plans	Small Site Windfall Allowance	Total Projected Delivery to 2036
Charnwood	8,820	1,990	9,024	1,040	20,874

- 2.5 We are concerned that the sites identified in the Local Plan and then reflected in the Housing Trajectory do not provide a sufficient supply of sites to meet the needs of Charnwood along with a proportion of the unmet needs generated by Leicester and Leicestershire.
- 2.6 By increasing the number of identified sites in the Local Plan, the Council (and local communities) can be confident that the plan is fit for purpose, justified and effective in its approach to housing delivery. Without a greater number of sites, which provides greater flexibility for all involved through a wider range of developments the overall housing supply for the plan period can be achieved.
- 2.7 Taking a positive and proactive approach to increasing site allocations now will ensure that the Council does not have to undertake an “early review” and therefore provides more certainty for all. By front loading sites and expected delivery, the Council will build a solid foundation for housing across Leicestershire which will accord with the Statement of Common Ground established between authorities as well as “protecting” Charnwood from speculative applications should their rates of delivery fall over the plan period.

7.3 What evidence is there to support the estimated supply from the above sources and is it robust?

- 2.8 It is recognised that the Council regularly collate evidence to support housing supply across the plan area, but this can always be subject to dispute depending on the stage in the planning and construction process that information is sought.
- 2.9 We are concerned that information relating to supply and the sources of this are not robust and are often subject to challenge across all types of sites. Our representations from August 2021 identified issues and concerns relating to the supply of some sites within the Plan and over the plan period it is reasonable to assume that further delays and issues with supply will be encountered.

7.4 How does the proposed annual requirement of 1111 dwellings in Policy DS1 compare with recent housing delivery?

- 2.10 When comparing the annual requirement of 1,111 against the housing trajectory (Exam 11) this shows the estimated total completions. For the period of 2021-2022 this has been below the 1,111 target however does meet the target once the past/projected completions are taken into account.

- 2.11 The Housing Delivery Test Study (2017)¹ this estimated an average housing delivery rate of 1,048 homes per annum. A comparatively low figure next to the 1,111 target.
- 2.12 The average housing delivery rate is lower than the proposed annual requirement which should be of concern to the Council as they prepare their Local Plan. In order to meet the identified needs of Charnwood and contribute to meeting the unmet need identified across Leicester and Leicestershire, it is our view that the Local Plan housing target should be much higher in order to “significantly boost” housing land supply as required by the NPPF.
- 2.13 For the Charnwood Local Plan to truly provide a “significant boost” to housing land supply across the plan area, a more ambitious housing target is required to address the acknowledged unmet need across Leicester and Leicestershire. Without this, the Local Plan will further facilitate the same issues and will not be effective in meeting overall needs.

Supplementary Questions:

In the light of the Inspectors’ findings (Exam 55) that the minimum local housing need for Charnwood is 1,189 dwellings per year and pending changes to the housing requirement in Policy DS1, do any additional sites need to be allocated to ensure that the Plan identifies a sufficient supply of specific, deliverable sites for years 1 – 5 of the Plan period and specific, developable sites or broad locations for growth for years 6 – 10 and where possible for years 11 – 15?

- 2.14 As per the housing trajectory (Exam 11) it is clear from the year 2031 onwards there is a struggle to identify the 5-year housing land supply and therefore additional sites needs to be brought forward to cover the 10 + period of the plan.
- 2.15 The site at Six Hills would help to meet the longer-term need for strategic sites and display much needed future growth within the borough which is clearly lacking 10 years into the plan period.
- 2.16 The site is deliverable and located in a sustainable location close to the strategic highway network within commutable distance to the centres of Leicester, Nottingham and Newark.

7.6 Does past delivery and/or the Housing Delivery Test results have any implications for the appropriate buffer to be added to the five year land supply?

- 2.17 Past delivery and the Housing Delivery Test results make adding an appropriate buffer increasingly difficult due to the current target not taking into account the higher housing requirement incorporating Leicester’s unmet need target.

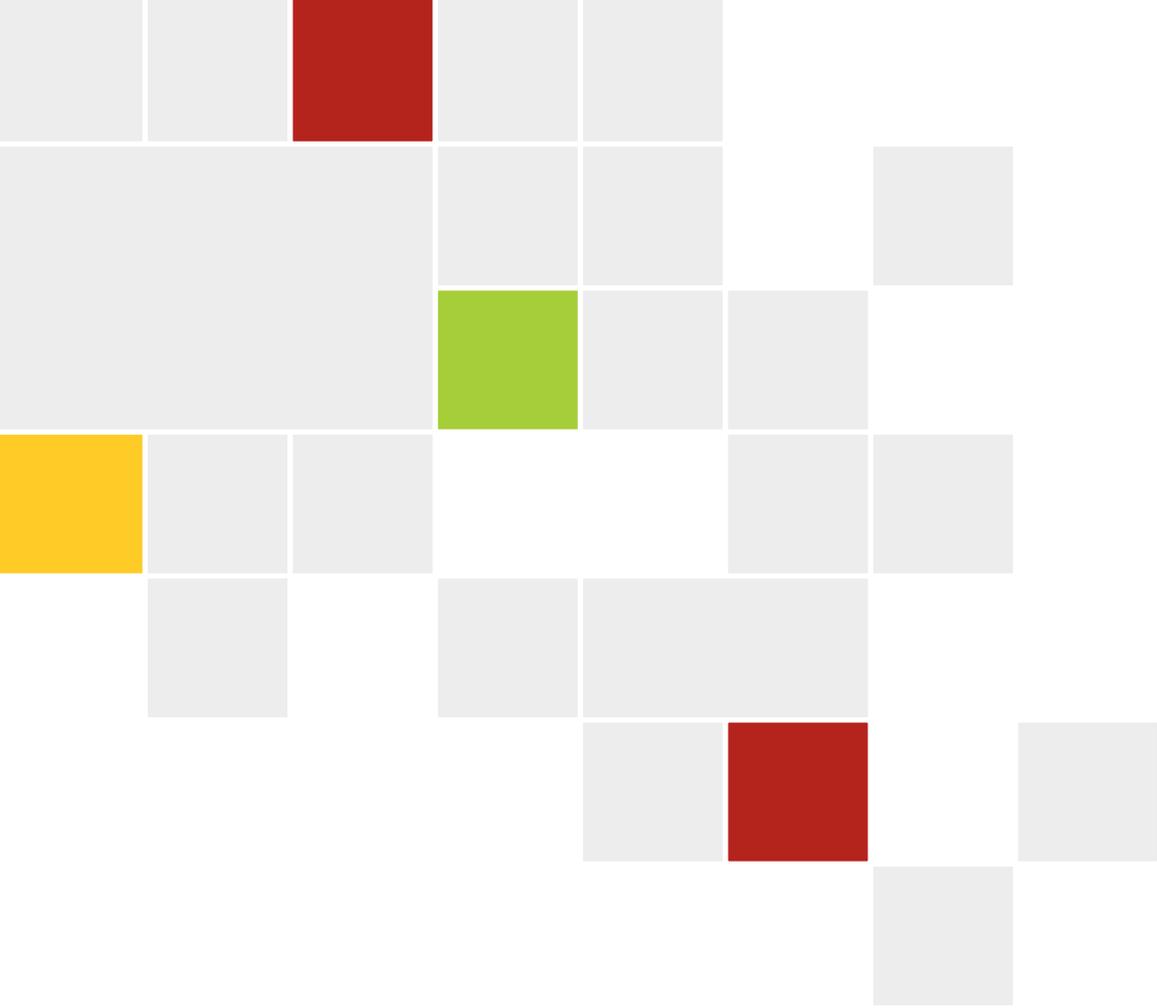
1 – Housing Delivery Test Study, (2017), prepared by BBP Regeneration, *Charnwood Borough housing delivery scenarios*, (online), https://www.charnwood.gov.uk/files/documents/housing_delivery_study_dec_2017/Housing%20Delivery%20Study%20-%20Dec%202017.pdf

- 2.18 An appropriate buffer needs to be reconsidered in relation to the five-year supply but past delivery should not be a factor in this. The buffer to be used should be calculated based on the identified need and increased accordingly to ensure that housing land supply is effective in significantly boosting delivery of new homes across the plan area.

Supplementary Questions:

In the light of the Inspectors' findings (Exam 55) that the minimum local housing need for Charnwood is 1,189 dwellings per year and pending any changes to the housing requirement in Policy DS1, do the housing trajectory (Exam 11) and the Five Year Housing Land Supply provided in the Council's Matter 7 Hearing statement (question 7.6) require updating? Are there any other changes in circumstances due to the delay in the Examination process that need to be addressed as part of any update to the trajectory and land supply documents?

- 2.19 Based on the council's findings both of these matters need updating to better understand the future housing targets and need within the Borough.
- 2.20 As per the Housing Delivery Study from 2017 this identified a shortfall in short term land supply within the Borough as a result from long lead in times from larger sites needing to be brought forward. Therefore, in the short term there will be an undersupply, and this is likely to be the case unless altered until the mid-2020s.
- 2.21 Although enough land and sites have been allocated to meet the housing requirement until 2035/36 the delivery rates to release this land will cause an issue and backlog of supply. Increasing the number and variety of site allocations through additional sites such as Land at Six Hills will ensure that the Council is always in a positive position in relation to housing choices and options for sites over the plan period. The Council have in conjunction with neighbouring authorities identified unmet need across Leicester and Leicestershire and yet still a shortfall of land and sites in the later years of the plan period.
- 2.22 To avoid this issue, Exam 11 and the five-year housing land supply require revision in order to reflect the housing increase and ensure enough homes are being delivered within the right places.



Boyer

