

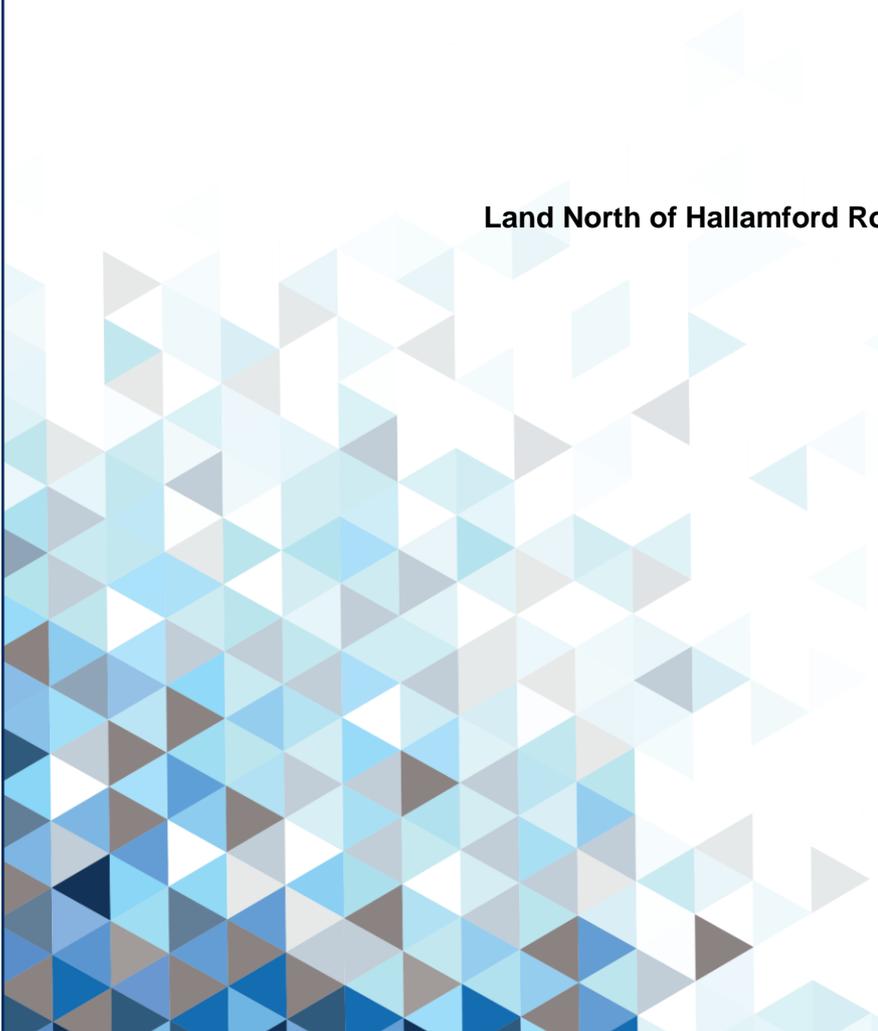
For and on behalf of
Gloebal Ltd

**Charnwood Local Plan
Examination in Public
Supplementary Matters, Issues & Questions
Matter 7: Housing Land Supply**

**Land at Oakley Road (HA33) and
Land North of Hallamford Road and West of Shepshed (HA35)**

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

June 2022



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 content]

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 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	5

1.0 INTRODUCTION

- 1.1 This response to the supplementary Matter 7 of the Inspectors' 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 Gloeal Ltd.
- 1.2 SPRU have made submissions on behalf of Gloeal Ltd to the Regulation 19 consultation (July – August 2021) on the emerging Local Plan. This statement should be read in conjunction with these submissions (representation numbers PSLP/562 and PSLP/563). Detailed written statements were prepared in response of Matter 7 in June 2022. DLP prepared written submissions and appeared on behalf of Gloeal Ltd. and other clients in respect of Matter 10.
- 1.3 This statement outlines Gloeal Ltd.'s comments in respect of HLS and the deliverability and developability of identified provision towards the housing requirement over the plan period. This takes account of the conclusions within EXAM55 and the necessity for provision towards Leicester's unmet needs, with responses to the Inspectors' MIQs (Matter 7) set out below.
- 1.4 These earlier submissions set out that the allocation of sites HA33 (Land at Oakley Road) and HA35 (Land North of Hallamford Road and West of Shepshed) is supported and that the allocation of the sites for residential development is sound. Details of both sites are contained within Statements of Common Ground agreed with the Council in EXAM49 and EXAM50 respectively.
- 1.5 The evidence highlights that the sites are being actively promoted and are progressing towards the submission of planning applications. Supporting work to facilitate bringing forward the abovementioned sites, including the preparation of indicative masterplans, further demonstrates that the allocation of the land in question, including an increase to the capacities for development proposed in the submission version Plan, would be justified and effective and that development would be deliverable and developable in the early years of the plan period following adoption.
- 1.6 In addition, the sites would constitute a well related and logical extension to the urban area (as well as the other proposed allocations and previously constructed developments along the north western side of Shepshed) in a sustainable location, supporting and offering prospective residents good access to public transport, education, employment and other local facilities and services. The sites are therefore well placed to encourage more sustainable patterns of travel and reduced reliance on the private car, consistent with the principles for sustainable development set out in the NPPF.

2.0 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

1. 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?

- 2.1 In reality, we believe that the Council should be making plans to fulfil a minimum requirement of 1,234 dpa, which is in line with our response to the Matter 4 additional question (paragraph 2.4). This includes Leicester's unmet need of 78 dpa and Charnwood's most recent LHN.
- 2.2 Additionally, we support the continued imposition of an additional 10% buffer on top of this to accommodate for any delays or variations in delivery among designated sites, as was stated in our response to Matter 2 Supplementary Question 2.
- 2.3 On behalf of our client, we submit that an increase to the capacity for development above those identified in the submission version Plan, specifically in relation to land at Shepshed (HA33 and HA35), will be required to ensure sufficient deliverable and developable supply. This is not solely related to the necessity of modifications to the housing requirement. In terms of the assessment of supply upon adoption this primarily reflects previously stated concerns that the provision for housing delivery is overly reliant on large-scale strategic sites, notably SUEs inside the district, even if we concur with the Council's approach to the broad spatial strategy.
- 2.4 These elements of the proposed spatial strategy, which have been linked to significant gaps in housing delivery against previously adopted strategic policies and minimum annual local housing need, carry forward existing site allocations and committed development under the adopted Local Plan to a large extent (since 2020). The substantial housing gap that exists right now is mostly the result of the Council recalibrating the anticipated trajectories for the three committed SUEs at Garendon Park, Broadnook, and Thorpebury.
- 2.5 These issues underpin soundness failings within the Plan as submitted in relation to its effectiveness and ability (in practice) to main adequate supply and reflect any practical buffer in overall provision. Within the circumstances of necessary modifications to address Leicester's unmet needs and an extension of the Plan Period the result is simply a failure to demonstrate supply to meet the relevant housing requirement.
- 2.6 The reliance on SUEs increases the potential for disruptions to supply. After carefully examining the locations that make up the district's most recent claimed HLS position, grave concerns are raised about the district's continued and disproportionate reliance on a small number of large SUEs to provide contributions in the early stages of the Plan period.
- 2.7 In the absence of an updated trajectory beyond that provided by the Council at Matter 7, confirming an increased capacity on allocated sites, we reiterate the comments made in our Matter 7 Statement from June 2022.
- 2.8 Despite the fact that the Council can only demonstrate 3.04 years' worth of deliverable sites against the existing supply, with a maximum supply of 7,260 houses considered deliverable between 2023 and 2028, the reliance on just three key SUEs is clear. For example, the SUEs at Garendon Park, Broadnook, and Thorpebury are scheduled to deliver 2,305 houses over

a 5-year period. This accounts for 32% of all deliverable sites.

- 2.9 Even within the pre-submission version of the Local Plan's estimated supply, the three designated SUEs are expected to account for 42.7% of the total proposed provision (19,554 dwellings).
- 2.10 The Council in their original Matter 7 Statement set out a marginal supply upon adoption. The below table considers the supply against LHN 2020, LHN 2020 + 78 unmet need, LHN 2021 and LHN 2021 + unmet need when using the Council's claimed supply.

Table 1. Council Supply Calculations (April 2023)

	LHN 2020	LHN 2020 + 78	LHN 2021	LHN 2021 +78
Annual Requirement	1,111	1,189	1,156	1,234
5-year Requirement	5,555	5,945	5,780	6,170
Shortfall	769	925	859	1,015
Deliverable Supply	7,260	7,260	7,260	7,260
Supply in Years	5.7	5.3	5.5	5.1

- 2.11 We have, however, noted that in respect of the three strategic allocations listed above, both the lead-in and build out rates are optimistic. We note that in respect of LUC2 and LUA2 there are agreed SoCG which confirm the trajectory but having regard to the planning history and the number of developers actively engaged on site, for both, we consider a maximum of 180 dpa is illustrative of a realistic prospect of deliverable supply and a useful illustration of the robustness of the trajectory.
- 2.12 This reflects regional average and has regard to infrastructure requirements and triggers within both planning conditions and Section 106 legal agreements. We further note that there is not agreed statement of common ground for LUA3. We have therefore assumed a maximum build out rate of 150 dpa. The effect of this is as per Table 2 below:

Table 2. DLP Supply Calculations

	LHN 2020	LHN 2020 + 78	LHN 2021	LHN 2021 +78
Annual Requirement	1,111	1,189	1,156	1,234
5-year Requirement	5,555	5,945	5,780	6,170
Shortfall	769	925	859	1,015
Deliverable Supply	6,825	6,825	6,825	6,825
Supply in Years	5.4	4.9	5.1	4.7

- 2.13 As such, against both baseline LHN requirements with the unmet need, the Council will not be able to demonstrate a sufficient supply upon adoption of the Plan – and this doesn't reflect potential delays elsewhere.
- 2.14 For reference we firmly believe that it is correct to use LHN 2021 plus the 78 dwellings unmet

need from Leicester i.e., 1,234 dpa.

- 2.15 In order to assist the Council in meeting the requirement to demonstrate a deliverable 5-year housing land supply, the Plan under review must ensure the diversity of sites allocated and supported in terms of their potential for earlier delivery.
- 2.16 Spreading development throughout a wider range of settlements, or at the very least concentrating on sites with a range of sizes in the most sustainable settlements, would assure market competitiveness and give the highest possibility of delivery in the short- to-medium-term.
- 2.17 The most practical opportunity to meet and maintain the supply of housing required by national policy will be provided by dispersing a variety of sites within the most sustainable settlements, both in terms of size and location. Modifications to acknowledge the additional capacity for development on sites proposed to be allocated at Shepshed under HA33 and HA35 would be consistent with achieving these objectives.
- 2.18 Aside from the benefits of taking a wider variety of sites into account, the soundness of the Council's plan period buffer in provision against the housing requirement should be critically examined, including how any future increases might address any potential future delays in the delivery of larger sites. Currently, in addition to the housing requirement, 1,658 more homes have been found through allocation. The Council's strategy is favourable in theory; a bigger buffer would allow for more adaptability, could handle market shifts, delivery delays, and would give HLS a stronger sense of confidence.
- 2.19 With the Examination providing a basis for identifying contributions to Leicester's unmet needs within the strategy (and any additional site allocations as proposed), then any reduction in the size of the buffer in the overall provision should only be taken into consideration after the Council's overall assumptions for calculating housing land supply upon adoption have been tested.

2. 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?

- 2.20 We consider it essential that the Council provide an updated trajectory that outlines increased capacity on sites such as HA33 and HA35. This will allow a detailed assessment that sets out if the Council will be in a position to demonstrate a sufficient supply of deliverable housing post adoption of the Local Plan.



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

