



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
Lagan Homes

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

Land at Anstey

**Prepared by
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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 on behalf of Lagan Homes. 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 has previously prepared detailed written statements on behalf of our clients Lagan Homes in relation to Matter 7. DLP prepared written submissions and appeared on behalf of Lagan Homes and other clients in respect of Matter 10.
- 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 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 Inspector's MIQ's (Matter 7) set out below.

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 need 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 provision for Charnwood's most recent calculation of 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 additional allocations will be required to ensure sufficient deliverable and developable supply, but 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. Our client's response to Matter 4 Q4.4 of the Inspectors' MIQs for example identifies the failure of the submission version Plan to satisfy national policy requirements for the provision of small sites and opportunities for SME housebuilders. These shortcomings undermine the ability to ensure the Plan contains robust and effective measures to sustain supply.
- 2.6 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.
- 2.7 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.
- 2.8 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.

- 2.9 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.
- 2.10 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).
- 2.11 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. Councils Supply Calculations (1 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

- 2.12 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. 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 no 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. Additional provision upon sites such as our client's Land at Gorse Lane would be consistent with achieving these objectives and addressing the anticipated shortfall in supply against five-year requirements.
- 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 allocated sites 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.



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