

## CHARNWOOD LOCAL PLAN EXAMINATION

### Matter 7: Housing Land Supply

#### Submission from CPRE Leicestershire

June 2022

Representation Number: 340

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### **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**

*Note – the Council's responses to these questions should include an updated housing trajectory, updated completions information for 2021/22, site proformas and the Statements of Common Ground with site promoters (referred to in EXAM2).*

#### **Supply over the Plan Period**

##### **Question 7.1**

*What assumptions have been made to inform the trajectory for the delivery of housing sites in terms of:*

- a. Lead in times for planning permission being approved*
- b. Outline and reserved matters applications*
- c. Site preparation and ground works*
- d. Average build out rates and numbers of sales outlets*

1. CPRE has not considered all sites in detail. We do believe that the timescale for delivering the North East Leicestershire Urban Extension may be over-conservative. The current build-out rate of 200 dpa (from 2026-2033) would only need to be raised to approximately 300 dpa to achieve the full site development within the plan period.

2. We are also not clear why the build out rate for those years is deflated compared to 2024-2026 and 2034-2037.

3. The SHELAA proforma for the site (*Thurmaston PSH210/Examination Reference*) suggests a build-out rate of 200 dpa for 4 builders. It then goes on to say that:

*'There is considered to be a reasonable prospect that development will be delivered within the timeframe shown (i.e., within the plan period) based on a judgement of the potential economic viability of the site and developer capacity to complete and let/sell the development over that period.'*

4. That would suggest that the site could well be built-out within the plan period.

5. On that basis CPRE consider that the Council should be working with the developer to ensure development occurs within the plan period. This would increase supply and reduce the need for other greenfield sites, which would, of itself, one would expect allow development to progress more quickly. On that basis and with no prejudice to our views on specific development proposals we consider the plan should include the full 4,500 homes.

## **Question 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*

6. A contribution to housing supply will inevitably also be found from windfall sites but we have not seen data from the Council which allows us to examine the historic small and large windfall sites performance.

7. The Leicester/Leicestershire Statement of Common Ground 2021 (SCG/1)<sup>1</sup> assumes 640 small windfalls (I assume under 10 dwellings although it is not defined in the tables) by 2031 or 1040 by 2036, In other words, 80 dpa. However, the Plan goes to 2037 so a figure of 1120 dpa would be correct by this calculation.

8. The current situation is also inconsistent with other Leicestershire Authorities such as Hinckley and Bosworth who are allowing for a windfall allowance in their local plan.

9. It is hard to tell without seeing the historic annual figures but this may be an underestimate depending whether it is based on 5 or 10 years of data because the recession post 2010 tended to dampen windfalls in those years. Further monitoring data from the Council may allow an upward shift in reliable Windfalls but it is hard to tell.

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<sup>1</sup> [The Statement of Common Ground.pdf \(leics.gov.uk\)](#), Appendix A and Appendix B.

10. The 2021 Leicestershire Statement of Common Ground would therefore suggest that small scale windfalls should amount to 1,120 dwellings over the plan period, without any consideration of larger windfalls.

11. It is, of course, harder to predict future windfalls on larger sites. However, the Council could examine the likelihood of such sites coming forwards. The 16 Dec 2020 Government Statement (*Examination Reference*<sup>2</sup>) anticipates this in regards to the largest 20 cities, such as Leicester, but it may well be that Loughborough and other towns also see changes in retail, leisure and office needs.

12. CPRE, therefore, considers that the figure of 1,120 for windfalls would not only be robust, it would be likely to be an under-estimate.

### **Question 7.2 (continued)**

*d. Sites with outline planning permission for 10 or more dwellings*

*e. Site allocations*

*f. Sites on the brownfield register*

13. CPRE has not considered each of these in detail. We may wish to comment on new evidence on this produced by the council, but we note that both our comments on the Urban Extension North and East of Leicester and on windfalls would increase delivery in all timeframes if included in the plan.

*(In responding to this question, the Council should provide updated figures from the most recent monitoring information)*

### **Question 7.3**

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

14. As set out on Matter 4.3 we consider the supply side figures should be increased but assuming a failure rate of 5% for commitments. Using the 2014 ONS figures this would create an overall requirement of 19,023.

15. As well as adopting a 5% commitments approach, CPRE Leicestershire also argue that all the houses with planning permission on the North East of Leicester Urban Extension should be included in the plan adding an additional 1,295 to the supply (4,500 in total on both sites).

16. A further contribution as set out above of at least 1,120 homes from windfalls should be included.

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<sup>2</sup> CPRE Matter 7 Government response to planning consultation 16 Dec 2020

17. Additional homes might further be added with a review of the yield of sites based on a modest increase in densities in line with the density policy CPRE is suggesting and in line with the Leicestershire Joint SHELAA Methodology (*Examination Reference*<sup>3</sup>) approach which assumes a density of 30 dph but 40 dph on 'sites within and adjacent to the Principal Urban Area and in selected Centres'. something the Charnwood SHELAA (EB/DS/1) does not assume despite the large number of sites on the edge of centres, including Loughborough itself.

18. We suggest the following Density Policy Wording (Similar to Hinckley and Bosworth Plan proposal (*Examination Reference*<sup>4</sup>))

*The Density of development will be guided by good design principles and the prevailing character of the area rather than specific density targets. However, unless justified through principles of good design, to ensure the efficient use of land the following minimum densities apply to residential development:*

- *At least 40 dwellings per hectare within and adjoining...*
- *At least 30 dwellings per hectare within and adjoining... and in Rural Villages and Rural Hamlets*

*All developers will be expected to demonstrate that they have sought to use land efficiently.*

19. Such a policy would not in our view be over restrictive as it would firmly put the emphasis on good design, although it would, at the same time, ensure developers needed to justify the approach taken in relation to density of development.

20. This would also be consistent with the approach suggested in the 16 Dec 2020 Government Statement which seeks to increase housing in Urban Areas.

21. Overall, taking account of this additional supply, we consider the excess housing needing to be allocated would then amount to 3,101 (ONS2016) or 6,005 (ONS2014). This would be robust, especially as it does not take account of any large-scale windfalls or increases in yield (for example from modest density improvements) which might be achieved.

22. This would reduce the need for housing to be accommodated on new Green Field sites across the Borough.

#### **Question 7.4**

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

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<sup>3</sup> CPRE Matter 7 SHELAA Joint Methodology Paper - 2019

<sup>4</sup> CPRE Matter 7 Hinckley plan density extract from Hinckley and Bosworth, Consultation Draft Plan June 2021 [https://www.hinckley-bosworth.gov.uk/downloads/file/7356/draft\\_local\\_plan\\_2020\\_-\\_2039](https://www.hinckley-bosworth.gov.uk/downloads/file/7356/draft_local_plan_2020_-_2039)

23. CPRE may wish to comment on this matter based on the new evidence put forwards by the Council.

### **Five Year Housing Land Supply**

#### **Question 7.5**

*What is the relevant five-year period on adoption and what is the requirement?*

*(The Council's response to this question should include a worked table of the five-year requirement and the deliverable five-year supply position against the requirement).*

#### **Question 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?*

#### **Question 7.7**

*Is there clear evidence to support the delivery of sites in the relevant five-year period on adoption?*

#### **Question 7.8**

*Based on a requirement of 1111 dwellings per year, would the Plan help to ensure a five-year supply of deliverable sites on adoption and over the Plan period?*

24. CPRE may wish to comment on these matters based on the new evidence put forwards by the Council.