

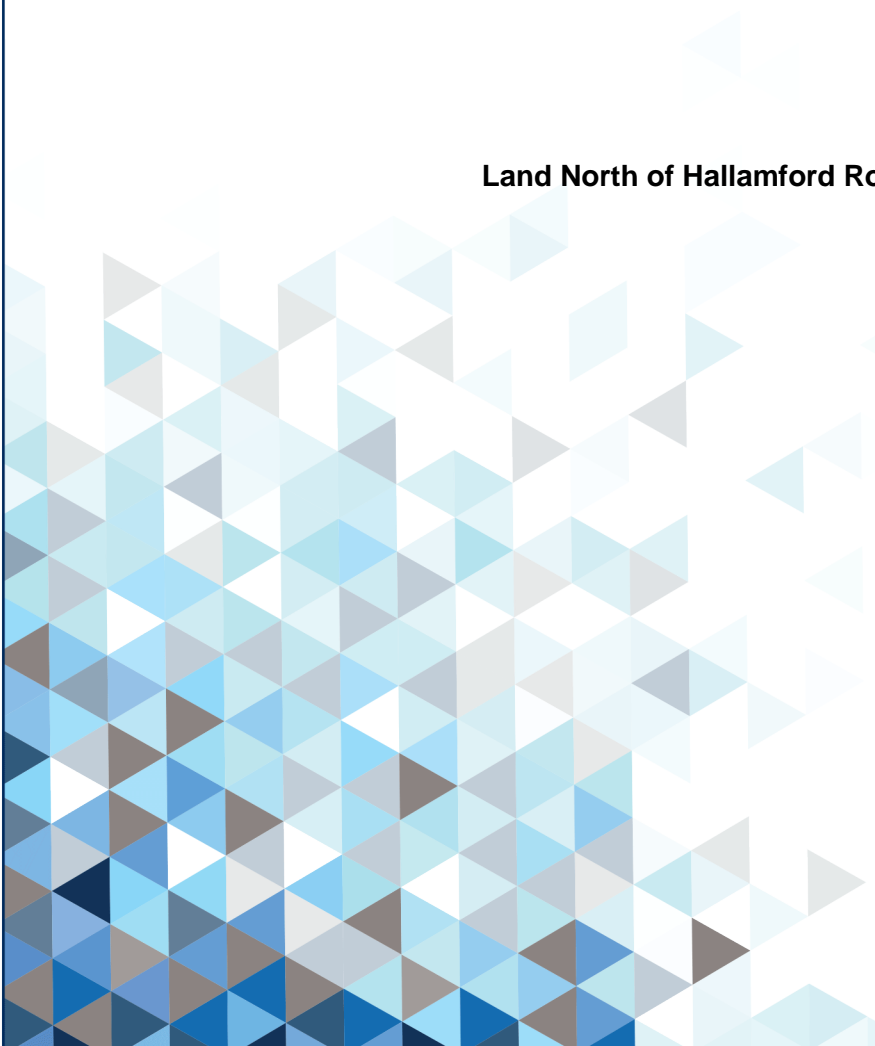
For and on behalf of
Gloebal Ltd

**Charnwood Local Plan
Examination in Public
Matter 7: Housing Land Supply**

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

**Prepared by
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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 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 Limited.
- 1.2 SPRU have made submissions on behalf of Gloeal Limited 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).
- 1.3 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. The evidence highlights that the sites are being actively promoted and are progressing towards the submission of planning applications. Supporting work to support bringing forward the abovementioned sites, including the preparation of indicative masterplans, further demonstrates that the allocation of the land in question would be justified and effective and that development would be deliverable and developable in the early years of the plan period following adoption.
- 1.4 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.
- 1.5 Nevertheless, there remain a number of issues raised in our previous representations that require modifications to the Draft Local Plan to ensure it meets the tests of soundness. In summary, this Hearing Statement seeks to assist the Inspectors through the response to relevant MIQs and further reinforces the justification for the following proposed suggested modifications in respect of allocations HA33 (Land at Oakley Road) and HA35 (Land North of Hallamford Road and West of Shepshed) and related elements of the Plan:
- The delivery trajectory for sites HA33 and HA35 as set out in Appendix 2 of the Draft Local Plan should be modified as follows:

Policy Ref.	2021/ 2022	22/ 23	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30	30/ 31	31/ 32	32/ 33	33/ 34	Total Capacity
HA33: Land at Oakley Road	0	0	0	25	48	48	48	35						204
HA35: Land North of Hallamford Road and West of Shepshed	0	0	0	0	48	48	48	48	48	48	48	48	24	408

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

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**

- 2.1 As detailed in our Matter 6 statement, Site HA33 is expected to deliver a total of 204 units. A planning application is currently being prepared for this site which seeks outline planning permission for the erection of up to 204no. dwellings, including a policy compliant provision of affordable housing, and associated infrastructure. The application is proposed to be submitted with all matters reserved for subsequent approval, save for access. Submission of the application is expected within the next six months. It is expected that Site HA33 will commence delivery in 2024/25 and be completed by 2028/29, delivering between 25 and 48 dwellings per year.
- 2.2 Site HA35 is expected to deliver a total of 408 units from 2025/26 onwards until 2033/34, delivering around 48 dwellings per year. The assumptions within the trajectory for this site anticipate submission of an application for planning permission within the next six to twelve months.
- 2.3 With respect to sites HA33 and HA35, the housing trajectory set out in Appendix 2 of the Draft Local Plan should therefore be modified as follows.

Policy Ref.	2021/ 2022	22/ 23	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30	30/ 31	31/ 32	32/ 33	33/ 34	Total Capacity
HA33: Land at Oakley Road	0	0	0	25	48	48	48	35						204
HA35: Land North of Hallamford Road and West of Shepshed	0	0	0	0	48	48	48	48	48	48	48	48	24	408

- 2.4 Both proposed trajectories have been the subject of engagement with the local planning authority as part of ongoing discussions regarding preparation of Statements of Common Ground for the respective sites. The trajectories in this Hearing Statement are presented without prejudice to the Council’s publication of its overriding assumptions to inform the overall housing trajectory, and pending completion of the aforementioned SoCGs. However, for the avoidance of doubt engagement to inform the trajectories as currently proposed reflect our client’s estimated timescales while also taking into account the Council’s historic evidence of lead-in and build-out rates and input from engagement with other site promoters.
- 2.5 These assumptions, and any subsequent information to be published by the Council, will be expanded upon orally as part of the Hearing session.

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?

- 2.6 Whilst we support the Council in their approach to site identification and allocation, we are slightly concerned that the Council is placing significant emphasis on the delivery of large scale strategy sites (including Sustainable Urban Extensions (SUEs) within the district. To a significant extent these components of the proposed spatial strategy carry forward extant site allocations and committed development under the adopted Local Plan, which have together been associated with significant shortfalls in delivered against the housing requirement in previously adopted strategic policies and minimum annual local housing need (since 2020). The Council has widely acknowledged that a re-profiling of the anticipated trajectories for the three committed SUEs at Garendon Park, Broadnook and Thorpebury comprises the principal reason for the current significant shortfall in housing land supply.
- 2.7 Being overly dependent on SUEs again risks supply issues. Having reviewed in detail the sites that comprise the latest claimed housing land supply (HLS) position for the district, some concern is noted in respect of a continued and overriding reliance on a few large SUE's to contribute in the early stages of the Plan period.
- 2.8 Notwithstanding the fact that against the current supply the Council can only demonstrate 3.04 years' worth of deliverable sites, with a maximum supply of 3,701 dwellings being considered deliverable between 2022 and 2027, the reliance on just three strategic SUEs is highly evident. For example, across the 5-year period of the supply, the SUEs at Garendon Park, Broadnook and Thorpebury are expected to deliver 1,710 dwellings. This represents 46.1% of all deliverable sites and 90.4% of sites for 10+ dwellings.
- 2.9 Even within the expected supply set out in the pre-submission version of the Local Plan, the three identified SUEs are expected to account for 42.7% of the 19,554 dwellings anticipated across the Plan period.
- 2.10 The effect of almost half of the claimed supply being delivered across just 3 sites carries considerable risk to securing the Council's full range of priorities including delays in delivery, infrastructure pressures and the potential for market absorption. Therefore, the Plan subject to the Examination needs to ensure that a range of sites, in terms of both scale and location, are allocated and supported in terms of their prospects for earlier delivery in order to assist the Council in meeting the requirement to demonstrate a 5-year housing land supply.
- 2.11 Spreading growth across a broader range of settlements, or at the very least focusing on sites of various sizes in the most sustainable settlements would ensure market competitiveness and provide the best possibility of delivery in the short-to-medium term. This flexibility, combined with careful land allocation within the main centres, will provide the Council with a fundamentally sound approach that ensures excellent residential options and delivery.
- 2.12 Regardless, distributing a variety of sites, both in terms of size and location within the most sustainable settlements, will provide the best reasonable chance of fulfilling and maintaining the supply of housing required by national policy. The Council's proposed spatial strategy for Shepshed is supported in this respect and provides for a range and choice of site allocations while supporting the area's strategic priorities including opportunities to provide for new education infrastructure and biodiversity enhancement.
- 2.13 In addition to the benefits of considering a wider spectrum of sites, the extent of the Council's plan period buffer in provision against the housing requirement should be assessed critically in soundness terms including where any further increase might address any further potential delays in delivery of larger sites should. At present, in addition to the housing requirement, an additional 1,658 dwellings have been identified through allocation. The Council's

approach is supported in principle a larger buffer would allow for great flexibility and could address market changes, delays in delivery and offer a greater sense of security in respect of HLS. Any reduction in the extent of the buffer in overall provision should only be considered once the Council's overall assumptions for the calculation of housing land supply upon adoption have been tested *and* in circumstances where the Examination provides the basis to identify contributions towards Leicester's unmet needs within the strategy (and any additional site allocations) as proposed.

7.2 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**

- 2.14 As detailed alongside the pre-submission version of the Local Plan, the total provision of housing anticipated post-adoption was some 19,554 dwellings. This comprised 8,355 dwellings from commitments of existing SUEs, 2,248 dwellings from other existing planning commitments and 8,858 dwellings to be brought forward as allocations under Policy DS3.
- 2.15 Under Policy DS3, as set out in the pre-submission version of the Local Plan, the allocation at Oakley Road (HA33) is expected to deliver 133 dwellings. As noted in representations to the Pre-Submission (Regulation 19) version Local Plan and shown on the illustrative masterplan, site HA33 is capable of delivering 204 dwellings; a figure which the landowner is seeking to agree with the Council through a Statement of Common Ground (SoCG).
- 2.16 The same is true of the land north of Hallamford Road (HA35), which the pre-submission version of the Local Plan stated would deliver 250 dwellings over the Plan period. As set out in our Regulation 19 representations and shown in the illustrative masterplan, this site is capable of delivering 408 dwellings; a figure which the landowner is also seeking to agree with the Council through a SoCG. Further detail on the justification for these capacities is set out in our Matter 6 Hearing Statement.
- 2.17 Between just these two sites, an additional 229 dwellings are capable of being suitably and sustainably delivered to contribute towards the emerging housing requirement. Therefore, it is anticipated that similar work and discussions have been ongoing with other landowners in respect of some of the other sites allocated under Policy DS3. Therefore, the supply set out in the pre-submission version of the Local Plan is considered capable of modification and revision upwards to provide a degree of increased flexibility and robustness.
- 2.18 The effect of realising a more accurate capacity for the small and medium sized allocations will be to further reduce the reliance on the three existing SUEs. As is clear from the current published supply position, the reliance of SUEs is proving problematic. As such, any ability to increase capacity of sites and the buffer in overall supply across the plan period is fundamentally supported and essential for the soundness of the Council's proposed spatial strategy. This is necessary in order to ensure that it is effective and consistent with national policy regarding the ability to satisfy the minimum five-year requirement for deliverable supply.

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

- 2.19 As the Council will probably recognise, the trajectory prepared to inform the Pre-Submission version Local Plan in terms of the anticipated delivery upon specific sites relied upon within the first five years following adoption lacked the clear evidence required by the definition of deliverability in national policy to demonstrate a realistic prospect that completions would begin within five years, and at the delivery rate required. Given the nature of the proposed trajectory and the characteristics of large scale strategic sites relied upon the trajectory also lacks sufficient evidence to support the conclusions that the overall provision of housing will satisfy the housing requirement over the plan period in terms of the deliverability and developability of supply at the point envisaged.
- 2.20 As is set out above, and on the basis of direct experience of working with the Council in relation to specific sites proposed for allocation, we are confident that work is ongoing and will be presented to the Examination by the Council which demonstrates an accurate reflection of supply from the above sources. Some of this will come through the preparation of SoCG, as is the case with our client’s sites at Land at Oakley Road and Land North of Hallamford Road, Shepshed. These reflect not only assumptions regarding timescales for housing delivery but also seek to capture clear relevant information on matters such as the provision of education infrastructure. In this respect the Council’s approach to engagement on sites as proposed to be allocated has the prospect of avoiding delays arising under the existing development plan.
- 2.21 Without prejudice to arrangements for effective ongoing assessment of deliverable supply, including the response to Modifications suggested as part of this Examination and a positive approach by all parties as part of future development management processes, the Council’s approach to engagement for proposed allocations HA33 and HA35 in our view provides for the types of clear evidence required to demonstrate deliverability as outlined in the PPG (ID: 68-007-20190722)

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

- 2.22 As is detailed in the latest published Annual Monitoring Report (December 2021) completions for the previous 5-years are as follows:

Year	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021
Completions	943	1,107	1,117	993	1,116
5 year Average	1,055				

Source: Charnwood Annual Monitoring Report 1st April 2020 to 31st March 2021

- 2.23 It is therefore clear from the above that there is strong correlation between the proposed annual housing requirement and recent completion trends. This is indicative of the proposed housing requirement being reflective of market conditions in the district and demonstrates that the proposed annual requirement is not in any way an unrealistic requirement that will place undue and unrealistic pressure on the Council to deliver in excess of market parameters.
- 2.24 Equally, given the significant shortfall in supply that exists within the Council’s current published position, it is clear that sites proposed for allocation to satisfy the housing requirement and diversify supply identified by the development plan upon adoption are critical to sustain these delivery rates in the short-to-medium term. This follows the substantial re-profiling of supply upon committed SUEs and is a reflection of the role of small and medium size sites as proposed to be allocated within the development plan reducing a

reliance upon sites granted either at Appeal or contrary to existing policy.

Five Year Housing Land Supply

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).

- 2.25 On the basis that the Local Plan will be adopted before the next monitoring period (April 2023), the relevant five year period on adoption would be 2022/2023 to 2026/2027. The 5-year period should be rolled forward a year for each April that passes before adoption.

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?

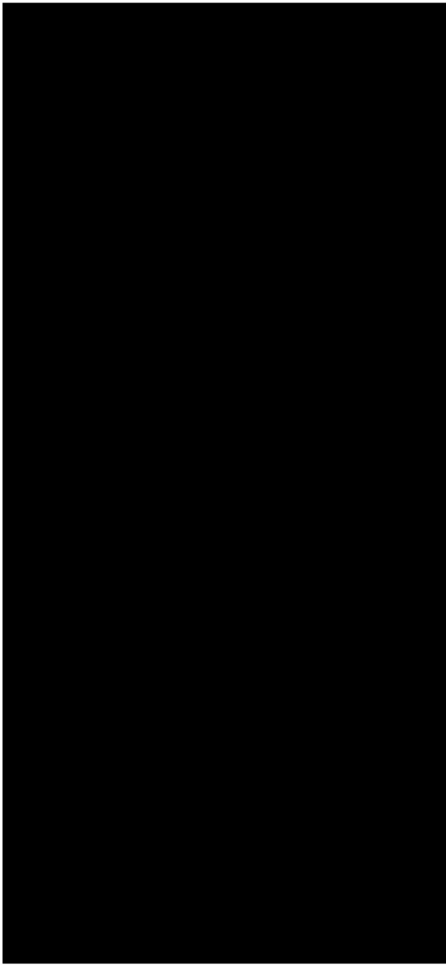
- 2.26 The Council have confirmed that they will not be seeking to apply paragraph 74b of the 2021 NPPF post adoption of the Local Plan. Accordingly, a 5% buffer for the purpose of calculating HLS is appropriate and should be applied.

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

- 2.27 As part of the revised trajectory and supporting information, the Council will have been required to provide detailed evidence of deliverability, in line with the definition set out in the glossary of the 2021 NPPF. Without site of this evidence, we are unable to make a judgement in respect of the robustness and reliability of all assumptions.
- 2.28 Notwithstanding this, we can confirm that in respect of Land at Oakley Road and Land North of Hallamford Road, the Council have worked closely with DLP as agents on behalf of our client to provide evidence to the Examination. This demonstrates that the sites are deliverable and can make an important contribution in some of the earlier years of the plan period following adoption.

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?

- 2.29 Once again, without the benefit of an updated trajectory, we are not able to accurately respond to this question. Based on the pre-submission version of the Local Plan, some minor concerns exist in respect of a continued reliance on strategic scale development.
- 2.30 It is therefore essential that where possible sites proposed for allocation to satisfy the housing requirement and diversify supply upon adoption, such as those at Oakley Road and Hallamford Road, are delivered as quickly as possible, increasing the flexibility associated with potential delays in the delivery of larger SUEs to be brought forward.
- 2.31 We do however note the within the pre-submission version of the Local Plan, at Appendix 2, a marginal supply of 5.37 years in 2021, reducing to 4.88 years in 2029, was set out. It is therefore essential that through the Examination process, careful consideration is given to the components of supply, the order in which sites may realistically be delivered, and the application of additional flexibility, to demonstrate opportunities for flexibility and contingency should supply start to drop below the requisite 5-years. The suitable and sustainable increase in the capacity for development upon sites HA33 and HA35 relative to the trajectory in the submission version Local Plan represents one such example of the additional contingency that can be identified.



RTPI

Chartered Town Planner

