



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
Lagan Homes

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

Gorse Hill, Anstey

**Prepared by
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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 Lagan Homes.
- 1.2 This hearing statement should be read alongside previous representation to the Regulation 19 consultation on the Local Plan and should be considered in the context of support for the Local Plan.
- 1.3 DLP have not been invited to participate in the Matter 7 Hearing Session, but have prepared this Written Statement to assist the Inspectors as part of the Local Plan Examination
- 1.4 This statement outline's Lagan Homes comments in respect of Housing Land Supply and the deliverability and developability of identified provision towards the housing requirement over the plan period, 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

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 It is not possible to remark in detail on this issue without having a clear view of the most recent trends across the Borough. Lead-in timeframes and build-out rates should be reliable and well-documented, and they should take into account previous local evidence for Charnwood in terms of the characteristics for development upon small, medium, and large-scale sites.
- 2.2 This is of substantial concern, given the successive re-profiling of anticipated supply on Strategic Urban Extensions (SUEs) within the borough and limited if any local evidence available to support the assumptions relied upon in terms of delivery rates on sites of this size. It is self-evident given the Council's significant identified shortfall that sites proposed for allocation are overwhelmingly necessary to satisfy the housing requirement and diversify supply identified by the development plan upon adoption.
- 2.3 The delay to the publication of the Council's overall assumptions is significant because it precludes stakeholders from being able to determine whether the nature and scale of allocations as proposed will satisfy the requirements of national policy and presentation of an effective spatial strategy. Our client's position, as set out in representations provided as part of the Regulation 19 (Pre-Submission) version Local Plan is that the allocation of additional sites is required to satisfy the housing requirement.
- 2.4 The Council should proceed with caution when deciding the lead in rates for larger scale development, where there are considerable upfront infrastructure requirements, as evidenced by the existing inability to demonstrate a five year supply of deliverable sites against the relevant housing requirement. The Council effectively publishes no such information regarding the acknowledged significant shortfall alongside its published calculation of supply and schedule of sites.
- 2.5 The number of sales outlets anticipated should, for example, reflect the access arrangements and acknowledge the disadvantages, complexities associated with multiple housebuilders sharing access points.
- 2.6 We note that the three SUEs identified within the supply, Garendon Park (adopted policy LUC2), Broadnook (adopted policy LUC3), and Thorpebury (adopted policy UUA2), are said to be capable of delivering between 100 and 210 dwellings per annum, based on the most recent available evidence, namely the April 2022 five-year housing land supply statement.
- 2.7 Given that there are only two points of entrance into the site and the number of sales units is yet to be established, Thorpebury's delivery of 210 houses in a single year (2026/2027) appears unrealistic. If this were indeed to become the case, the Council would likely continue to see significant supply issues.
- 2.8 In order to mitigate the complexities associated with lead in and build out rates on larger sites, the Council should seek to allocate a sufficient supply of small to medium sized developments, where traditionally, delivery is more straightforward and not subject to the

same scale of delays experienced with larger sites.

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?

- 2.9 Whilst there is some support for the Council's approach to the spatial strategy and diversifying the selection of sites proposed to be allocation, including within the Leicester Urban Area and at Anstey, concern is expressed that the Council is placing significant emphasis on the delivery of large-scale strategic sites (including Sustainable Urban Extensions (SUEs) within the district.
- 2.10 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.
- 2.11 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.
- 2.12 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.
- 2.13 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.
- 2.14 The effect of nearly half of the estimated supply being delivered across just three sites poses a significant risk to the Council's broad range of priorities, including delivery delays, infrastructure difficulties, and market absorption potential. As a result, the Plan under examination must ensure that a variety of sites are allocated, in terms of both scale and location, to help the Council achieve the obligation to maintain a 5-year housing land supply.
- 2.15 We believe that spreading growth throughout a wider range of settlements, such as within the Service Centres and within the Leicester Urban Area, will ensure market competitiveness and provide the best chance of delivery in the short-to-medium term. While the Council's proposed approach to the allocation of sites at Anstey and Glenfield is broadly supported our client's Land at Gorse Hill would provide complementary opportunities for delivery as part of these components of the spatial strategy and would not prejudice meeting site-specific and strategy-wide infrastructure requirements upon sites identified in the submission version Plan. The provision of additional flexibility in this location would reduce the overall risks to delivery.
- 2.16 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 allocations proposed together

with the expected delivery of SUEs within the plan period.

- 2.17 The identification of additional land should recognise that allocating a range of sites, both in terms of size and location, will provide the best reasonable prospect of meeting and maintaining the supply of housing as is required by national policy. Indeed, this approach is supported by the NPPF which recognises the important contribution that small and medium sized sites can make in delivering housing in an area (NPPF21 Paragraph 69). Improving the availability of smaller sites would help to speed up delivery and create opportunities for SME housebuilders, as is a key recommendation from the Letwin review.
- 2.18 The Council's approach is supported in principle however 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**

- 2.19 The HLS, as accompanying the pre-submission version of the Local Plan, is seeking to deliver 19,554 homes over the plan period. This includes 8,355 houses from existing SUE obligations, 2,248 dwellings from other existing planning commitments, and 8,858 dwellings that would be brought forward through Policy DS3 allocations.
- 2.20 It is understood that additional work is ongoing with the Council and landowners considering the capacity of sites allocated under Policy DS3. It is likely that the yield from a number of sites will increase. The effect of realising a more accurate capacity for the small and medium sized allocations would be to reduce the reliance on the three existing SUEs. As is clear from the current published supply position, the reliance of SUEs is proving problematic and as such, any ability to increase capacity of sites and the buffer in overall supply across the Plan period is fundamentally supported.

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

- 2.21 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.

It is anticipated that the Hearing session for this Matter will provide scope for subsequent

discussion of more recent engagement undertaken by the Council together with current unpublished details of an updated housing trajectory. In the absence of the opportunity to make verbal submissions on behalf of Lagan Homes at this session, we reserve the right to undertake further detailed analysis of the robustness of the Council's overall position as part of future written submissions including consultation upon any proposed Main Modifications and the anticipated assessment of Housing Land Supply.

7.4 How does the proposed annual requirement of 1111 dwellings in Policy DS1 compare with recent housing delivery? Five Year Housing Land Supply

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 As a result of the foregoing, it is obvious that the planned annual dwelling need and recent completion patterns are highly correlated. This indicates that the planned housing demand reflects market conditions in the district and that the proposed annual requirement is not in any way excessive, placing undue and unwarranted pressure on the Council to provide in excess of market norms.

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.

2.25 Notwithstanding this, in failing to Plan for higher levels of growth than has been witnessed in recent years, the Council are missing the opportunity to significantly boost the supply of homes (NPPF 2021 paragraph 60).

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).

2.26 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?

2.27 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?

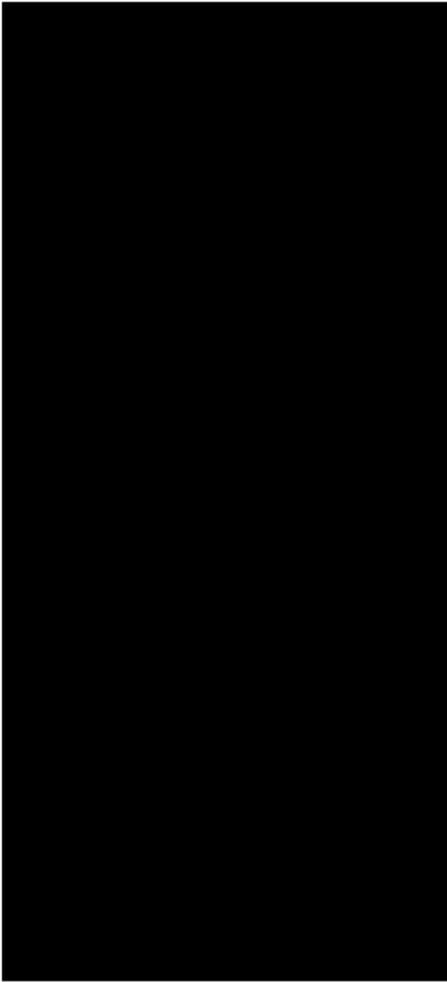
2.28 At present there is insufficient evidence to demonstrate that the sites contained both with the pre-submission trajectory and indeed the latest HLS statement are deliverable. Clear,

relevant evidence of the types outlined within the PPG (ID: 68-007-20190722) will be required in order for the tests of deliverability set out in the glossary to the NPPF 2021 to be met. Numerous Appeal Decisions have confirmed that simply the exchange of correspondence or submission of proformas by developers are inadequate to provide the clear evidence required.

- 2.29 The Council must, as part of their ongoing work, publish this evidence and submit to the Examination, Participants and respondents should be afforded the opportunity to respond to the revised information orally and in writing.

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?

- 2.30 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 concerns exist in respect of a continued reliance on strategic scale development and the Council's persistent record of re-profiling delivery expectations.
- 2.31 We do however note that 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, should supply start to drop below the requisite 5-years.
- 2.32 Further the allocation of additional land, such as that at Gorse Hill, should be considered should supply be of concern throughout the Examination. Indeed, the Inspector examining the Welwyn Hatfield Local Plan opted to pause proceeding whilst the Council identified additional sites to meet their need. Inspector Mel Middleton's concerns regarding that Plan's ability to demonstrate a five year supply of deliverable sites upon adoption remain a relevant consideration in the ongoing assessment and selection of 'omission' sites. This approach is fundamentally supported in such circumstances.
- 2.33 Notwithstanding this, should the identification of additional sites be required, for the purpose of an additional buffer, or to address unmet housing need, sites capable of coming forward in the short-term and contributing early in the Plan period should be identified.



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