

Ian Kemp
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Date: 1 June 2022

Our ref: 60628/

Your ref:

Dear Ian

Charnwood Local Plan Examination - Response to Matter 7

This statement to Matter 7 (Housing Land Supply) of the examination of the Draft Charnwood Local Plan (“DCLP”) is submitted by Lichfields on behalf of St Philips Land Limited (“St Philips”).

It follows the submission of representations to the Regulation 19: Pre-Submission Draft of the Charnwood Local Plan (July 2021) in respect of land off Cotes Road, Barrow upon Soar, in which St Philips has land interests. For reference, the representations comprising these proposed changes were identified under Representation ID **PSLP/618**.

It should be clarified that separate representations were made by Marrons Planning on behalf of St Philips, Rosconn Strategic Land, William David Homes and Swithland Homes under Representation ID PSLP/633. However, this representation set out their joint position on Policy DS3 (HA49) with each party making wider representations to the plan through individual representations.

The National Planning Policy Framework (“NPPF”) outlines that during the examination process a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspector’s questions which set out why we consider changes to the DCLP are necessary to ensure the soundness of the Plan.

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

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**

Appendix 2 of the Plan sets out the housing trajectory which sets out the following yield in respect of site **Allocation HA49**:

Policy Ref.	Site	2025/ 2026	2026/ 2027	2027/ 2028	2028/ 2029	2029/ 2030	2030/ 2031	Total
HA49	Land off Cotes Road, Barrow upon Soar	25	40	40	40	40	35	220

St Philips considers that these assumptions are both realistic and reasonable in terms of lead-in times and build-out rates.

Lichfields' *Start to Finish* (February 2020) indicates that for sites of between 100-499 dwellings, the average build-out rate is 55 dwellings per annum. The Council has therefore assumed a realistic delivery rate where it assumes only a maximum annual rate of 40 dpa across the whole site.

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**
- d Sites with outline planning permission for 10 or more dwellings**
- e Site allocations**
- f Sites on the brownfield register**

In terms of site **Allocation HA49**, the Council assumes the delivery of 105 dwellings up to 2027/28 which would be within the first 5 years from adoption of the Plan. St Philips considers this a realistic and reasonable assumption.

Five Year Housing Land Supply

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

In terms of site **Allocation HA49**, the Council assumes the delivery of 105 dwellings up to 2027/28 which would be within the first 5 years from adoption of the Plan. St Philips considers this a realistic and reasonable assumption.

St Philips along with the other developers and promoters at the site have worked with Charnwood Borough Council and the Leicestershire County Council as the local education authority to support the allocation of Cotes Road as site HA49.

Yours faithfully



Jon Kirby
Senior Director