

## CHARNWOOD LOCAL PLAN EXAMINATION

### MATTER 7: HOUSING LAND SUPPLY

Inspectors' issues and questions in bold type.

This Hearing Statement is made for and on behalf of Bowbridge Homes (Nanpantan) Ltd. and should be read in conjunction with our representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630] submitted pursuant to the consultation by Charnwood Borough Council on its Pre-Submission Draft Local Plan 2021-37 [REF: SD/2] of July/August 2021. This Hearing Statement answers specific questions as set out in the Inspectors' Matters, Issues & Questions ["MIQs"] document issued on 25<sup>th</sup> April 2022.

**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**

**Q7.2 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

At the Pre-Submission stage of the Draft Local Plan, the Council acknowledged its housing land supply ["HLS"] to be 19,554no. dwellings, comprising:

- 8,355no dwellings from existing SUEs;
- 2,248no. dwellings from other existing planning permissions commitments (as at 31st March 2022);
- 8,858no. dwellings from allocations under Policy DS3.

As stated in our Hearing Statement for Matter 4 (Issue 1), our representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630], which were submitted during the Council's consultation on the Pre-Submission Draft Local Plan [REF: SD/2], set out the difficulties related to strategies where HLS is particularly dependent upon one or relatively few large strategic sites, demonstrating that, in such instances, greater numerical flexibility should be applied than if the HLS was more diversified, and with housing delivery instead best optimised via delivery of the widest possible range of housing site sizes and market locations, providing suitable land buying opportunities for small, medium and large housebuilding companies and ensuring a continuous short to medium term HLS.

As set out in our Hearing Statements submitted in respect of Matter 1 (Issue 1) and Matter 4 (Issue 1), the Plan should make provision to deliver Leicester City's unmet needs and also include provision for appropriate flexibility. Whilst the Pre-Submission Draft Local Plan [REF: SD/2] included a circa 10% headroom within its provision of 19,461no. dwellings to 2037, this headroom would be reduced further still to only 2% if the proposed allocations were to also address the increased housing requirement of 19,024 dwellings so as to include Leicester City's unmet housing needs apportionment for Charnwood. In order to maintain a circa 10% headroom as previously proposed, the Plan will need to include additional allocations for circa 1,465no. dwellings. However, we consider even a 10% headroom to provide insufficient flexibility and highlight that our aforementioned representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630] referred to neighbouring Harborough District Council including a 15% contingency over and above its minimum housing requirement and with the Local Plan Inspector in that instance specifically commenting that this was to provide resilience and was not to be regarded as the Council's contribution to meeting Leicester City's unmet housing needs. A similar approach is advocated in this instance, with a 15% headroom amounting to a need for allocations to accommodate a circa additional 1,900no. dwellings.

Furthermore, if the Plan period was to be extended by a year to 2038 in order to ensure it plans for a minimum of 15-years post-adoption, as required by Paragraph 22 of the NPPF, the overall requirement, again including Charnwood's agreed apportionment of Leicester City's unmet housing need, would amount to circa 20,213no. dwellings. A 15% headroom above this amount, to provide for appropriate flexibility, would result in an overall need for 23,245no. dwellings, which, set against the housing provision of 19,461 proposed in the Pre-Submission Draft Local Plan, would result in a need for an additional 3,784no. dwellings.

The Plan should therefore be modified to increase the housing requirement through the allocation of further sites in order to provide for the agreed apportionment of Leicester City's unmet housing need as well as to provide for greater flexibility in the HLS to ensure the delivery of the planned housing growth.

A range of sites have already been considered through the Sustainability Appraisal [REFS: SD/5 and SD/6], with opportunities available which align with the proposed spatial strategy and its focus on development in the main urban areas of the Borough and which are suitable, deliverable and available now. In this respect, our client's site on land off Leconfield Road, Nanpantan, Loughborough - previously included as housing allocation HS33 in the Regulation 18 consultation of the Draft Charnwood Local Plan 2019-36 [REFS: SD/20 and SD/20a] (and later assessed as site PSH447 in the Sustainability Appraisal [REFS: SD/5 and SD/6] of May 2021) - provides such an opportunity to help address this additional requirement, in a highly sustainable location on the edge of the main Urban Centre of Loughborough. Our representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630], which were submitted during the Council's consultation on the Pre-Submission Draft Local Plan [REF: SD/2], set out that, with our client as a housebuilder, this site can deliver up to 30no. dwellings from 2023, with associated access, landscaping, open space and drainage infrastructure and with further assessments undertaken since those earlier representations concluding that wider benefits in terms of specifically identified off-site biodiversity enhancements can also be delivered as part of that development.

Our aforementioned representations of 23<sup>rd</sup> August 2021 [REF: PSLP/630] included a Parameter Plan, Landscape Masterplan and Illustrative Layout Plan to demonstrate how this site could deliver up to 30no. dwellings in an appropriate manner and with a copy of the latter being copied below.

Illustrative layout for 30no. dwelling scheme on land off Leconfield Road, Nanpantan, Loughborough



**Q7.4 How does the proposed annual requirement of 1,111 dwellings in Policy DS1 compare with recent housing delivery?**

The proposed annual requirement of 1,111no. dwellings is not dissimilar to recent housing delivery figures – the 2021 Housing Delivery Test shows 1,117no completions in 2018/19, 993no. in 2019/20 and 1,116no. in 2020/21 - suggesting that, notwithstanding the aforementioned need to also plan for the agreed apportionment of Leicester’s unmet housing need, this will merely represent a ‘business as usual’ approach rather than delivering a significant boost to HLS.

**Five Year Housing Land Supply**

**Q7.8 Based on a requirement of 1,111 dwellings per year, would the Plan help to ensure a five-year supply of deliverable sites on adoption and over the Plan period?**

Whilst Appendix 2 of the Pre-Submission Plan [REF: SD/2] showed a 5-year HLS position of 5.37 years in 2021, reducing to 4.88 in 2029, a subsequent assessment by the Council – available in its Housing and Employment Monitoring section of its website (and copied below) has acknowledged that, as of 1<sup>st</sup> April 2022, the Council can demonstrate only a 3.04-year of HLS. If the Council cannot demonstrate a 5-year HLS on adoption of the Plan and demonstrate that it will be able to maintain this throughout the Plan period, the Plan should be found unsound.

The Council's acknowledged HLS as of 1<sup>st</sup> April 2022 (source: Charnwood Borough Council's website)

**Charnwood Five Year Housing Land Supply – 1<sup>st</sup> APRIL 2022**

	<b>Charnwood Borough Housing Supply as at 1<sup>st</sup> April 2022</b>	<b>Charnwood Total</b>
a	Charnwood Housing Requirement from 1 <sup>st</sup> April 2022 (1,160 dwellings per annum)	-
b	Number of dwellings required for 5 years 2022-2027, (5x 1160).	<b>5,800</b>
c	Number of dwellings required for 5 years 2022-2027 including 5% to ensure choice and competition in the market for land. (NPPF Para 73a)	<b>6,090</b>
d	Expected supply of deliverable sites (dwellings from planning permissions likely to be built 2022 -2027)	<b>3,701</b>
e	Surplus over requirement (d - c)	<b>-2,389</b>
f	Number of years supply (d divided by 1218 (c divided by 5) )	<b>3.04 years</b>