



HEARING STATEMENT: MATTER 7

Representation No: 542
Land at Main Street, Cossington

on behalf of
Spitfire Homes

30 May 2022

Client Reference: RCA152o

Last User: JB

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EXECUTIVE SUMMARY

This is a response to the Matters, Issues & Questions, on behalf of Spitfire Homes. The response relates to Matter 7: Housing Land Supply.

We do not comment on all Issues and Questions, but only those which are relevant to our client.

In this document, we raise concern regarding the lack of ambition shown with the emerging Local Plan, in the context of a housing crises, an affordable housing emergency and the prolonged period during which the Council have been unable to demonstrate a 5 Year Housing Land Supply. We also consider that there is a lack of flexibility within the plan and without modification, will not meet the Government's aim of significantly boosting supply of housing.

1. ISSUE 1: WHETHER THE PLAN WILL PROVIDE FOR A SUFFICIENT HOUSING LAND SUPPLY

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?

- 1.1. We have deep concerns on this subject and consider that the Council has so far failed to provide a sufficient supply of housing within the submitted plan. As we referenced in our earlier Representation, we consider that the Local Plan lacks ambition and fails to recognise that the standard method provides a minimum starting point, not a ceiling or cap to development.
- 1.2. In view of the housing crisis and affordable housing emergency, we consider that the requirement for Charnwood should be revised upwards. We consider that this is even more important considering the prolonged period during which the Council have been unable to demonstrate a 5 Year Housing Land Supply. As an illustration of the scale of the problem, as of 1st April 2022, Charnwood's Housing Land Supply is an abysmal 3.04 years. The previous plan clearly failed to incorporate the level of flexibility to ensure the plan was fit for purpose throughout its life.
- 1.3. The submitted plan therefore needs to build in flexibility to mitigate this happening again. This should be achieved through an increase to the buffer to the housing requirement to help account for slower delivery on SUEs and assist delivery in the early years of the plan period. We raised in our previous Representation the perhaps unrealistic figures in the trajectory which heavily rely on completions from SUEs within the first year of their allocation and 365 within 2 years. This does not reflect the reality of protracted lead-in times typically associated with SUEs, which can take several years before the first completion.
- 1.4. Increasing the supply from smaller and medium sized housing allocations which do not require as much upfront infrastructure investment and tend to be led by housebuilders would help to address this problem.

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

- 1.5. The latest AMR is dated December 2021 and provides supply figures between 2011 and 2021. The most recent 5 year period (2016/17 – 2020/17) has seen a mean average annual delivery of 1,055 dwellings. When set against the requirement of 1,111 per annum set out in the Local Plan, this further supports our argument that the plan lacks ambition. It also fails to support the Government's objective of significantly boosting the supply of homes, particularly problematic given the previously discussed issues Charnwood have had in providing a 5 Year Housing Land Supply in recent years.

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?

- 1.6. In our previous representation, we raised significant concern regarding the housing trajectory, which is contained at Appendix 2 of the Local Plan. This shows that in April 2022 the supply position would be 6.4 years, rising to 7.86 years in April 2024. However, by April 2029, this drops below 5 years, with just a 4.88 year supply. The fact that the Borough acknowledges at this stage

that a 5 year housing land supply will not be maintained throughout the plan period is of considerable concern and on this basis the plan cannot be found sound.

- 1.7. We are aware that the Council intends to provide an updated trajectory based on data from 2021/2022, but that this is currently unavailable. It is unusual for this information not to be available at this late stage, and we would request the opportunity to make further formal comments on this document once published.