



Charnwood Local Plan Examination Statement

Matter 7: Housing Land Supply

Wednesday 20 July 2022

On behalf of **Barwood Development Securities Ltd**

Contents

- 1 Introduction 1**
 - 1.1 Summary of Our Objections to the Draft Submission Plan 1
- 2 Response to the Inspector’s Questions: Matter 7 2**
 - 2.1 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..... 2

1 Introduction

1.1 Summary of Our Objections to the Draft Submission Plan

- 1.1.1 This Statement has been prepared by Stantec on behalf of Barwood Development Securities Limited ('Barwood Land'). Barwood Land has an interest in the site known as Phase 2 land at Peashill Farm, Ratcliffe Road, Sileby. The site is the subject of an outline planning application for residential development of the site for up to 175 dwellings, as an extension to the Peashill Farm Phase 1 development, construction of which is already well advanced.
- 1.1.2 Our Regulation 19 response to the Plan, submitted in August 2021, found the Plan to be unsound, for reasons which can be summarised briefly as follows:
- Policies DS1 and DS2 do not provide sufficiently for the housing needs of the borough and the Leicester urban area; and
 - The above site should be allocated under Policy DS3 of the Plan in place of or in addition to some of the sites in Sileby/Cossington which are presently proposed as allocations.

2 Response to the Inspector's Questions: Matter 7

2.1 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

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: (In responding to this question, the Council should provide updated figures from the most recent monitoring information)

- 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

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

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

Five Year Housing Land Supply

Question 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).

Question 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?

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

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?

- 2.1.1 We await the Council's response to the above questions.
- 2.1.2 In the meantime, in this context, we note from the Council's published 'Charnwood Five Year Housing Land Supply: 31st March 2022' that there is currently a deliverable housing supply of only 3.04 years, in conflict with paragraphs 60 and 68 of the NPPF. We also question the optimistic delivery trajectory which finds (in Appendix 2 of the Plan) that, if completions from proposed allocations are included, there would actually be a housing supply of 5.37 years. In particular, we consider the delivery trajectories shown for the three SUEs are unrealistic and over ambitious, noting that construction work on these sites has only just commenced and all three require major infrastructure to be provided ahead of housing completions. Consequently, we submit that the Plan should allocate additional sites, particularly those for up to around 200 dwellings which can deliver housing early in the plan period, such as our client's site at Sileby.