

For and on behalf of
Gloebal Ltd

**Charnwood Local Plan
Examination in Public
Supplementary Matters, Issues & Questions
Matter 2: Vision, Objectives, Sustainable Development and the
Development Strategy**

**Land at Oakley Road (HA33) and
Land North of Hallamford Road and West of Shepshed (HA35)**

**Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
Sheffield**

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Prepared by:	Megan Wilson BSc (Hons) MSc MRTPI CIHCM Associate Director
Checked by:	Adam Place MRTPI Associate Planner
Approved by:	Jon Goodall MA (Cantab) MSc MRTPI Director
Date: January 2023	Office: Sheffield

Strategic Planning Research Unit

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1.0 INTRODUCTION

- 1.1 This response to the supplementary questions relating to Matter 2 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 Gloeal Ltd.
- 1.2 SPRU have made submissions on behalf of Gloeal Ltd. to the Regulation 19 consultation (July – August 2021) on the emerging Local Plan. A detailed Matter 2 Written Statement was prepared and submitted as part of the Inspectors' original MIQs. This statement should be read in conjunction with these submissions (representation numbers PSLP/562 and PSLP/563).
- 1.3 DLP's previous submissions address outstanding questions under this Matter to be considered as part of the resumed Hearings. DLP also prepared written submissions and appeared on behalf of Gloeal Ltd. And other clients in respect of Matter 10 (Unmet Housing Needs).
- 1.4 This statement outlines Gloeal Ltd's comments in respect of the Spatial Strategy, with responses to the Inspector's supplementary MIQ's (Matter 2) set out below.
- 1.5 These earlier submissions set out that the allocation of sites HA33 (Land at Oakley Road) and HA35 (Land North of Hallamford Road and West of Shepshed) is supported and that the allocation of the sites for residential development is sound. Details of both sites are contained within Statements of Common Ground agreed with the Council in EXAM49 and EXAM50 respectively.
- 1.6 The evidence highlights that the sites are being actively promoted and are progressing towards the submission of planning applications. Supporting work to facilitate bringing forward the abovementioned sites, including the preparation of indicative masterplans, further demonstrates that the allocation of the land in question, including an increase to the capacities for development proposed in the submission version Plan, would be justified and effective and that development would be deliverable and developable in the early years of the plan period following adoption.
- 1.7 In addition, the sites would constitute a well related and logical extension to the urban area (as well as the other proposed allocations and previously constructed developments along the north western side of Shepshed) in a sustainable location, supporting and offering prospective residents good access to public transport, education, employment and other local facilities and services. The sites are therefore well placed to encourage more sustainable patterns of travel and reduced reliance on the private car, consistent with the principles for sustainable development set out in the NPPF.

2.0 ISSUE 3 – THE DEVELOPMENT STRATEGY

1. DOES THE DEVELOPMENT STRATEGY SET OUT IN POLICY DS1 REPRESENT A ROBUST AND APPROPRIATE APPROACH FOR THE DISTRIBUTION OF HOUSING, EMPLOYMENT AND OTHER DEVELOPMENT IN THE LONGER TERM , HAVING REGARD TO THE INSPECTORS' INITIAL FINDINGS (EXAM 55) IN RELATION TO CHA RNWOOD'S APPORTIONMENT OF LEICESTER'S UNMET NEED FOR HOUSING AND EMPLOYMENT LAND?

- 2.1 The evidence base for the submission Plan broadly demonstrates that the strategy used to distribute growth in accordance with Policy DS1 is justified and represents an appropriate and sustainable growth option.
- 2.2 Leicester's unmet housing needs should be met in the most sustainable locations within the Borough, where daily access to the city of Leicester is achievable for residents. Wherever possible, the specific needs arising from Leicester should be located as close to the source of the unmet need (i.e., Leicester City) as possible. However, this should not undermine the Council's justified development strategy. Where additional capacity can be identified on allocated sites, such as at Shepshed, every effort should be made to incorporate this into the relevant allocation policy text as soon as is reasonably possible and modifications on this basis would be consistent with the strategy as submitted.
- 2.3 According to the Council's evidence, the need for new or expanded primary schools and a desire to avoid forcing smaller settlements to accommodate more significant levels of growth are the reasons why a greater proportion of new homes are being delivered in service centres as opposed to the hybrid approach. Delivery of a more strategic scale growth and related infrastructure, including a new three-form entry primary school, is fundamentally supported in Shepshed.
- 2.4 The allocation of growth at Shepshed, an Urban Area that is seen as a sustainable location for expansion, is supported in accordance with the distribution of housing development outlined in the table in Policy DS1. The land that is being proposed to be allocated under sites HA33 and HA35 in particular is located near to Shepshed's centre, and its development will make it possible to use sustainable modes of transportation there.
- 2.5 It is considered that Policy DS1 sets out a clear strategy for distributing future housing across the various settlements in the hierarchy.
- 2.6 It is important to note the how the strategy within DS1 responds to the relevant increase in the housing requirement should be reflected in consequential changes to Table 5 in the submission version Plan. Pending any changes to committed supply it is predominantly 'New Homes' identified as part of the Plan's provisions that give effect to the strategy and addressing the deficit against housing needs.
- 2.7 Policy DS1 must be read alongside Table 5 in respect of Shepshed to establish that the level of committed supply has been particularly low as a proportion of the total provision enabled as part of the proposed strategy (453 versus 1,878 dwellings respectively) but the position within the Plan as submitted cannot soundly be viewed as indicating a 'ceiling' upon the potential for development.
- 2.8 The level of additional allocations/residual addressed by the Plan in relation to accommodating an increased in the housing requirement should be made clear as part of modifications. Particularly for Shepshed it is predominantly modification of the distribution of new homes that boosts supply including ensuring a contribution towards unmet needs. As such, the role of Shepshed in the delivery of the development strategy provides a higher degree of flexibility and choice through a range of proposed allocations relative to existing commitments. It is entirely appropriate to seek to optimise the capacity upon sites currently

proposed for allocation, including at HA33 and HA35 as part of the necessity to respond to an increase in the housing requirement.

- 2.9 The "number of dwellings" that are predicted to be developed in each of the major settlements, groups of settlements, and urban areas during the course of the Plan period are listed in the table in Policy DS1. This should be updated to reflect the Inspectors' conclusions in regard to accommodating Leicester's unmet housing need and should explicitly express housing requirements as a minimum figure.

Table 1. Suggested updates to Policy DS1

	<u>Minimum</u> Number of Homes	Pattern of Development
Leicester Urban Area (Birstall, Syston, Thurmaston)	7,358	38% 37%
Loughborough Urban Centre	6,073	31%
Shepshed Urban Area	2,334 2,560	42% 13%
Service Centres (Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley, Sileby)	2,747	14%
Other Settlements	934	5%
Small Villages and Hamlets	18	0%
Total	19,464 19,690	100%

- 2.10 As previously submitted, the capacity estimates provided in each site allocation policy are likewise simply estimates that may marginally change during the application process, depending on pertinent design, density, and sustainability factors.
- 2.11 In accordance with our previous Matter 6 representations, the figure for Shepshed Urban Area should be increased by at least 229 units (to a minimum of 2,560) to reflect the increased deliverable capacities of sites HA33 and HA35 (as shown in Table 1 above).

2. IS ANY FURTHER SA TESTING OF THE OPTIONS FOR THE LEVEL AND DISTRIBUTION OF GROWTH NECESSARY HAVING REGARD TO THE INSPECTORS' INITIAL FINDINGS (EXAM 55) IN RELATION TO CHARNWOOD'S APPORTIONMENT OF LEICESTER'S UNMET NEED FOR HOUSING AND EMPLOYMENT LAND?

- 2.12 Based on the response on behalf our client to Supplementary Question 1 above and previous submissions we do not consider that modifications to address an increase in the housing requirement necessitate further SA testing in relation to the level and distribution of growth. The evidence base for the Plan as submitted adequately demonstrates that the potential for additional development at Shepshed can be achieved without resulting in significant adverse effects (see response to Question 1.18 in our original Matter 1 Hearing Statement).
- 2.13 Multiple scenarios, including a focused urban approach, a dispersed approach, and a new settlement strategy, were examined through the SA and took into account a spectrum of development trends throughout the Borough and had regard to the strategic relationship with Leicester.
- 2.14 Once again, based on the available evidence, we consider that the SA process was robust

and justified and has identified the most suitable strategy to meet not just Charnwood's needs, but also those arising from Leicester.

- 2.15 In respect of site-specific SA findings in relation to support for the additional capacity for growth allocations as proposed at HA33 and HA35 it is appropriate that these are subject to assessment as part of the modifications process. Evidence provided in response to question 1.17 of our original Matter 1 Statement and the contents of agreed SoCGs at EXAM49 and EXAM50 demonstrate how updated assessment findings should not reflect any increased potential for adverse effects against relevant SA objectives.



BEDFORD

Planning / SDD / SPRU

bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU

bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD

nottingham@dlpconsultants.co.uk

LEEDS

Planning

leeds@dlpconsultants.co.uk

LONDON

Planning

london@dlpconsultants.co.uk

MILTON KEYNES

Planning

miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU

sheffield@dlpconsultants.co.uk



RTPI

Chartered Town Planner

