



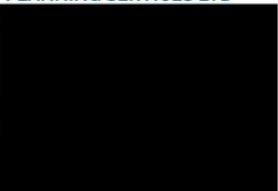
PLAN-IT X
TOWN AND COUNTRY PLANNING SERVICES

Charnwood Local Plan 2021-37 Examination:

Matter 2 - Vision, Objectives,
Sustainable Development
and the Development
Strategy

Written Statement on behalf
of Barrow upon Soar Parish
Council

PLANIT-X TOWN AND COUNTRY
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RTPI

mediation of space · making of place

Introduction

1. This Statement has been prepared on behalf of Barrow upon Soar Parish Council (BuSPC) in response to the Inspectors' Matters, Issues and Questions for the examination hearings for the Charnwood Local Plan 2021-2037.
2. BuSPC has previously made representations to the Regulation 19 Local Plan consultation in relation to the scale of development proposed for Barrow upon Soar and the lack of mitigating infrastructure improvements.
3. This Statement concerns Inspectors' Matter 2 - Vision, Objectives, Sustainable Development and the Development Strategy

Issue 3 – The Development Strategy

2:11 Is the distribution of development in Policy DS1 justified by the evidence and were all options for the level and distribution of growth tested through the Sustainability Appraisal? What is the justification for a greater proportion of new dwellings being delivered in the Service Centres compared with the 'hybrid' option tested?

1. BuSPC supports a development strategy which focusses housing and employment at the edge of Leicester, together with more managed growth at Loughborough and some growth in Shepshed. Significantly less growth should be directed to the Service Centres and Other Settlements.
2. However, in accordance with CLP Policy DS1, the six Service centres are to provide for 2,747 dwellings over the period 2021-2037- 14% of the total of 19,461. Of the 2,747 dwellings, 928 are already committed leaving 1,819 to be developed on new sites.
3. The provision of 1,819 dwellings to be developed on new sites within Service Centres is significantly greater than the proposed 'hybrid' development strategy tested by the Sustainability Appraisal which assumed a distribution of 1,000 dwellings. The planned level of growth for the Service Centres is more closely associated with growth options 2 or 3.
4. Although the Sustainability Appraisal (Appendix G) tested a range of new dwellings within the Service Centres it concluded:

'Somewhere in between a target of 1000 and 1600, there are no additional negative effects at all likely to occur, depending upon the choice and spread of sites. Presuming a small increase in growth at a range of settlements, this tweak to the strategy would therefore seem sensible as a minimum should higher flexibility in housing be sought.'
5. The Sustainability Appraisal therefore suggests that the provision of 1,819 dwellings within Service Centres could give rise to significant negative effects. These effects are likely to be exacerbated because the level of growth to be provided by the Service Centres may significantly increase because of:
 - a) Windfall sites approved in the period since March 2021;
 - b) Expanded windfall opportunities afforded by the relationship between the proposed housing allocations and revised Limits to Development;
 - c) The need to increase supply to meet Charnwood's local housing need plus Leicester's unmet need: and
 - d) Developer ambitions to deliver a scale of development on allocated sites in excess of the targets identified by CLP Policy DS3.

6. Further, rather than there be a 'spread of sites' with small increases in a range of settlements, almost three-quarters (74.2%) of the new homes to be provided in the six Service Centres are distributed to just two villages: Anstey and Barrow upon Soar. Disproportionate growth is planned in Anstey and Barrow upon Soar to support the provision of new primary schools there and this gives rise to a greater proportion of new dwellings being delivered in Service centres overall.
7. The Sustainability Appraisal did not test either the level of growth planned for the Service Centres or the distribution of growth among them.

2.13 Should the figures in the table in Policy DS1 be expressed as minimum numbers?

1. BuSPC believes that the housing figures should be expressed as a broad indication of the anticipated number of dwellings to be delivered by each site. The figures should not be expressed as a minimum as this could give rise to unsustainable development, particularly given that the level and distribution of growth is already likely to give rise to negative effects in Service Centres.

2.14 Will the distribution of housing development set out in the table within Policy DS1 achieve the overall stated aim of Policy DS1 for urban concentration and intensification, as well as minimising the need to travel, particularly by private car, and to prioritise sustainable modes of transport?

1. With respect to Barrow upon Soar, this matter was considered by Appeal Ref: APP/X2410/W/15/3004925. The appeal was made by Morris Homes Ltd, and others, against the decision of Charnwood Borough Council to refuse outline permission for the erection of up to 70 dwellings (Ref P/14/0685/2) at land off Cotes Road, Barrow upon Soar. The appeal was dismissed on 6 November 2015. The appeal site forms part of CLP allocation HA49.

2. In relation to 'accessibility' the appeal inspector concluded:

'Employment and facilities in and around Barrow-upon-Soar are not sufficient to sustain the local population. Consequently, most residents of the appeal site, like the rest of the village, would travel elsewhere for work, as well as for comparison shopping and they would also be likely to visit larger supermarkets elsewhere for many of their convenience purchases.

A development of up to 70 new homes would generate significant movement and the hourly bus service that would link the appeal site with Loughborough and Thurmaston would be unlikely to cater for much of this because of its infrequency. The distance to the bus stops in the village centre and the railway station, together with their frequency, equally makes it unlikely that they would make a major contribution to the travel patterns of the residents of the appeal site.

I have already discussed the accessibility of the site to village facilities and again have found the appeal site to be not well located in this respect. As a result, movement to and from the appeal site is likely to be dominated by the use of the private car.

Paragraph 34 of the Framework says that decisions should ensure that developments that generate significant movement are located where the need to travel can be minimised and the use of sustainable transport modes can be maximised. The appeal proposal does not meet this requirement. Whilst at paragraph 29 the Framework recognises that opportunities to maximise sustainable transport in rural areas will be different to those in urban areas, at paragraphs 93 and 110 it encourages radical reductions in greenhouse gas emissions. A development as dependent upon the use of the private car, as the appeal development is likely to be, would be unlikely to contribute positively to this.'

3. Much the same conclusion can be reached with all the sites allocated by the CLP in Barrow upon Soar and with many of the other sites allocated in Service Centres and Other Settlements. The housing development set out in Policy DS1 does not achieve the overall stated aim of Policy DS1 for urban concentration because so much development is directed to rural areas where car dependency is greatest.

Supplementary Question

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 Charnwood's apportionment of Leicester's unmet need for housing and employment land?
1. Given that the need arises from Leicester, there is merit in directing most of the additional requirement to the Leicester Urban Area (Birstall, Syston, Thurmaston). After all, the proposed Distribution of Housing Provision within the Housing Market Area set out in Exam 45 is, in large part, based on the functional relationship of the different Leicestershire authorities with the City, taking account of migration and commuting relationships between the authorities (in both directions). Exam 45 interprets PPG/NPPF as emphasising meeting Leicester's unmet need within or close to the Leicester Urban Area.
2. Further, the Sustainability Appraisal already indicates that the scale of development proposed in the Service Centres may already result in significant negative effects. It follows that further harm is likely if the Service centres are to accommodate more growth to meet Charnwood's apportionment of Leicester's unmet need for housing land.

3. It follows that the development strategy set out in Policy DS1 does not provide an appropriate basis for the distribution of additional housing, employment and other development arising from Charnwood's apportionment of Leicester's unmet need.

Supplementary Question

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?

1. If the Sustainability Appraisal did not test either the level of growth planned for the Service Centres or the distribution of growth among them, it follows that it not a suitable basis for testing the distribution of the additional development arising from Charnwood's apportionment of Leicester's unmet need. Further Sustainability Appraisal is required.

- 2.16 What is the justification for the level of growth being directed to Service Centres given the Sustainability Appraisal's finding (paragraph 5.1.2) that there is potential for negative effects above 1600 dwellings?

1. See answer to question 2.11 above.

- 2.17 Are the site allocations in the Service Centres of Anstey, Barrow upon Soar and Sileby (served by Cossington primary school) as proposed in Policies DS1 and DS3 justified when there is a lack of capacity in their respective primary schools? How would this be addressed?

1. Since BUSPC's initial representations were made, the intended primary school provision with respect to the proposed development in Barrow upon Soar has changed.
2. Current provision in Barrow upon Soar is provided by the Hall Orchard CofE Primary School (two-form entry) on Church Street close to the Village Centre. The local authority has worked in partnership with the school over a few years to increase the size of the school on a phased basis. This is to meet increased births and the demand of housing that has already been granted planning permission. The final phase to increase the school to 3FE (630 places) was programmed to be completed by 2022/23.
3. There is no further capacity to extend the current school on its existing site and it is the only primary school within a two-mile walking distance of the proposed developments. Primary schools in the surrounding villages are forecast to be full or impacted by current housing growth and rising births.
4. The current pupil forecast for Barrow Hall C of E Primary School suggests that there will be 32 primary places available in the early stages of construction of the housing allocations (subject to year group required). However, if the forecast increases and these places are no longer available then additional funding will be required for temporary accommodation and/or transportation costs whilst the new school is constructed.

5. Local plan policy DS3 supports development proposals at sites HA45, HA46, HA47, HA48 and HA49 subject to contributions to the reasonable costs of the provision of a new one-form entry primary school located at site HA49 (Land off Cotes Road, Barrow upon Soar).
6. Since the submission of the Local Plan, it has been agreed by the promoters of these development sites, the County Council and the Borough Council, that the primary school will be located on site HA48 (land off Willow Road). Therefore, there is a set of proposed Main Modifications to the submitted Local Plan (Exam4 Main6.s to Main6.y) and there is a current pending application on the HA48 site for 220 dwellings and a primary school (reference P/22/1254/2). It is noted that there has been no reduction in the capacity of site H48 and a significantly increased capacity for site H49 is anticipated by the promoters.
7. The promoters of the development sites have agreed an Education Delivery Strategy with the County Council and the Borough Council to ensure that all proposed housing allocation sites at Barrow upon Soar will contribute to the delivery of a new primary school at Barrow upon Soar. The primary contributions will be subject to restrictions preventing the commencement of development until they are paid in full. Financial contributions may also be necessary to cover the cost of transporting the pupils generated by the developments to the nearest primary school for a temporary period whilst the primary school is under construction.
8. At its meeting of 22 December 2022, Charnwood Borough Council's Plans Committee resolved to grant planning permission, subject to the completion a S106 Agreement and conditions for the following developments:
 - P/21/0759/2 Gladman Developments Ltd Outline planning application for up to 135 new dwellings, with all matters reserved except access-Land off Melton Road, Barrow Upon Soar (CLP site HA46); and
 - P/21/0760/2 Gladman Developments Ltd Outline planning application for up to 135 new dwellings, with all matters reserved except access-Land south of Melton Road, Barrow Upon Soar (CLP site HA45).
9. Primary School contributions are in accordance with the Education Delivery Strategy.
10. BuSPC supports the relocation of the proposed new Primary School to site HA48 because this provides a site with room for expansion and better highway access. However, the site lies on the very edge of the settlement and is therefore less accessible to residents increasing dependency on the use of the private car.

11. The Parish Council is of the view that the new school should be provided before the development of any dwellings on the allocated housing sites. This is because the lack of capacity at the existing Barrow Hall Orchard C of E Primary School will require pupils to transfer to other primary schools while the new primary school is under construction. However, the nearest primary schools at Mountsorrel, Quorn, Rothley and Sileby are already very close to capacity with little or no potential to expand. Therefore, pupils will need to be transferred to various primary schools many miles away.
12. That transfer will be by school bus, with transportation costs paid by the developer. However, these transportation arrangements will prevent pupils from benefiting from school activities before and after normal school times e.g., breakfast clubs, after-school activities, holiday clubs.
13. BuSPC remains concerned that the strategy of the Local Plan is so focussed on the delivery of new primary school provision, that the need for other community facilities and transport infrastructure improvements is largely ignored. Indeed, the approved permissions at sites HA45 and HA46 make little or no provision for public transport improvements, strategic highway improvements, a community centre or village centre car parking.

2.19 How would a 'proven local need' for off street parking in the last bullet of Policy SC1 be identified and is this part of the policy justified?

1. In 2015 Charnwood Borough Council undertook a Car Parking Impact Assessment of the Borough's main centres, including Barrow upon Soar Village Centre (Exam27).
2. The results of the surveys showed that both the High Street and the Co-op/Health Centre car parks were over 100% occupied (i.e. some vehicles were observed parking in areas where restrictions are in place and/or outside marked spaces) in the 09:00-11:00 beat of the Thursday survey. The High Street Car Park was also over 100% occupied in the 11:00-13:00 beat of the Thursday survey.
3. The Borough Council's Car Parking Impact Assessment also considered parking demand taking account of future housing growth. The calculations of future parking demand in Barrow upon Soar indicate that overall occupancy levels at off-street locations will exceed 85% during the week and on Saturday's occupancy levels are estimated to exceed 85% during morning periods.
4. The assessment concludes that to address the shortfall in parking in Barrow upon Soar in the period up to 2036, additional off-street car parking spaces should be provided. The proposed development of 703 dwellings will worsen the situation. The availability of parking is an important contribution to the vitality and viability of Barrow upon Soar Village Centre.

5. A Car Parking Site Availability and Deliverability Study (Exam28) was published in 2017 and identifies a range of costed options for increasing car park capacity in Barrow upon Soar Village Centre.
6. Exam27 provides a proven local need for additional off-street car parking in Barrow upon Soar Village Centre and Exam28 demonstrates how that shortfall can be addressed. However, no provision for increased off-street car parking in Barrow upon Soar is made in the Council's Infrastructure Schedule. No developer contributions towards addressing the shortfall in village centre car parking were sought from developments HA45 and HA46. Without additional car parking spaces, the vitality and viability of the village centre will be threatened.

2.25 Overall, will the Plan's vision and objectives contribute to the achievement of sustainable development and is the development strategy justified by the evidence and positively prepared? Are any main modifications necessary for soundness?

1. No. As set out in BusPC's answers above, the strategy of the Local Plan is so focussed on the delivery of new primary school provision in the Rural Centres of Anstey and Barrow upon Soar the strategic distribution of growth has become skewed. The resulting strategy will lead to unsustainable growth in these Rural Centres, as indicated by the Sustainability Appraisal, and a pattern of development that will lead to over-dependency upon the use of the private car. Further, the focus on the delivery of new primary school provision has meant that the need for other community facilities and transport infrastructure improvements to accommodate such large-scale growth is largely ignored.