
Charnwood Local Plan Examination

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

Define Planning and Design Ltd on behalf of Bloor Homes Ltd – Land off Willow Road, Barrow upon Soar (PSLP Representations Ref. PSLP/570) and Laburnum Way, Loughborough (PSLP Representations Ref. PSLP/572)

Matter 2, Issue 2: Is the proposed settlement hierarchy positively prepared and justified by the evidence and are the proposed limits to development justified and soundly based?

Question 2.3 & 2.5:

The Settlement Hierarchy Assessment (SHA) takes into consideration a wide range of relevant factors, including each settlement's pattern, context, local housing markets, travel to work patterns, retail catchments, employment provision, access to public transport, and the services and facilities available within it (SHA paragraph 1.5). The assessment of the availability of and access to services and facilities (Appendix A) has clearly been carried out on a consistent, justified and robust basis that takes account of the range of services and facilities that are available within each settlement, and the accessibility to higher order settlements and the services and facilities therein. Therefore, it provides a sound starting point from which to formulate the Local Plan's spatial strategy for growth.

The SHA has correctly identified the range of services and facilities that are available in Loughborough, given its role as the Borough's Urban Centre. Consequently, that has informed the appropriate 'ranking' of the settlement in Tier 1 of the settlement hierarchy. It recognises that it *"has a range of employment opportunities and higher order services that meet all of the day to day needs of residents and are accessible to the surrounding area."*

It has also identified the range of services and facilities available in Barrow upon Soar. That has also informed its appropriate 'ranking' as a Service Centre in the settlement hierarchy, and the distribution of growth in that regard.

Thus, the settlement hierarchy has been informed by a robust SHA and is reflective of the role and function of the Borough's settlements. It is, therefore, entirely sound in that regard.

Matter 2, Issue 3 – The Development Strategy

Question 2.11 and 2.16:

The overall Hybrid Strategy

The proposed spatial strategy and the distribution of growth has been extensively tested throughout the preparation of the plan, principally through the Sustainability Appraisal (SA) process. The justification for the spatial strategy is set out in the Submission Plan's SA (referred to hereafter as the Submission SA), which reflects that CBC have applied a robust methodology to consider a comprehensive range of spatial options, and have been transparent in preparing their strategy on that basis.

Having assessed a number of growth options, the Submission SA reached the view at para 4.3.41 that a hybrid approach should be considered that takes into account the strengths and weaknesses of each of the refined spatial options; with the aim of avoiding significant negative effects. In testing that hybrid

option based on a range of housing numbers, the Submission SA found that it performed more favourably from a wider environmental perspective than any other option (para. 4.3.44), that *“the distribution of growth ought to allow for negative effects to be avoided in most settlements, or the potential for mitigation and enhancement to be secured”* and that, if the Plan incorporates positively prepared policies, positive effects can be achieved. It also found (Submission SA para 4.3.46) that *“the picture with regards to socio-economic effects is positive.”*

The final spatial strategy has evolved from the hybrid option that was tested to identify an additional 1,058 dwellings in housing supply so as to fully meet CBC’s needs; taking account of the increase to the Borough’s local housing need and allowing for a marginally higher degree of flexibility (see paras 5.1 and 5.2 of Topic Paper 2). With that said, the Local Plan’s spatial strategy is broadly reflective of the hybrid approach, which the Submission SA found will locate growth in locations that fit well with the Strategic Growth Plan, reflect the vision of the plan, and take account of positive and negative impacts of growth (Submission SA para. 4.5.8). Thus, the broad spatial strategy is justified by a robust evidence base that has assessed a wide range of potential spatial options, and is entirely sound in that respect.

Distributing Growth to the Principal Urban Area, Loughborough and Shepshed

Whilst the Submission SA has guided the preparation of the final spatial strategy and the distribution of growth, CBC have appropriately taken a number of complex and inter-connected matters into account that cannot easily be considered through the SA process; notably in relation to aligning infrastructure and growth, responding to existing commitments, and ensuring the deliverability of the plan and spatial strategy. That is a positive approach to plan-making that reflects the scope of an SA, which is ultimately a high-level assessment that **guides** plan-making, but is not a precise and black and white tool, and should not be determinative in its own right.

In terms of the distribution of the additional sites that is required to fully meet CBC’s housing needs, the Submission SA has robustly considered how growth can be distributed across the various ‘tiers’ of the settlement hierarchy. Appendix G of the Submission SA reflects that, and highlights how the extra work sought to *“make focused changes to the preferred strategy without giving rise to additional significant effects”* (Appendix G of the Submission SA, para 1.1.3). As part of that, the SA identifies ‘critical growth thresholds’ where significant effects may arise, and has undertaken additional focussed assessments to understand the particular locations / sites where growth would likely generate negative or positive effects, and also the capacities of those areas to accommodate growth.

Topic Paper 2 (para 5.2) highlights the outcome of that assessment, directing some additional growth to Leicester’s Principal Urban Area, Loughborough, and Shepshed, reflecting the relative constraints and opportunities present. In doing so, it has reached the optimal level of growth in relation to each settlement so as to still realise the plan’s objectives, limit additional significant adverse effects, and ensure that the spatial strategy is deliverable (taking account of the presence of existing commitments and infrastructure delivery). The approach taken to distributing growth to those settlements is, therefore, entirely appropriate in that it has taken account of a range of relevant factors.

Notwithstanding that, BHL’s Matter 6 statements have highlighted that the capacities of some individual sites (i.e., Site HA16 Laburnum Way, Loughborough) should be increased to reflect an efficient use of land.

Service Centres

Appendix G of the Submission SA then sets out how growth in the Service Centres (at the next stage of the settlement hierarchy) was considered. The outcome of that process, as identified in para 3.200 of the Local Plan, has been to focus 1,819 dwellings to Service Centre settlements. That, too, has been entirely justified by the Submission SA, and particularly the focused consideration of individual Service Centres that has been carried out at Appendix G.

Whilst the initial SA found that “*there is potential for some limited growth of around 1,000 homes across the six Service Centres*” (para 4.5.6), and as such the Hybrid Strategy initially advanced on that basis, it had concluded that growth above this level was largely limited by the availability of health and school infrastructure.

The SA had, however, considered other scales of growth in reaching that hybrid option (the detailed assessments of those options are found in Appendix C of the Submission SA). Within that, the delivery of 1,600 units at Service Centres was considered in Option 3, whilst delivering 2,100 units at Service Centres was considered in Option 2.

As summarised in Topic Paper 2 (para. 3.14), the Submission SA finds that, if 1,600 dwellings are delivered at Service Centres, no significant adverse effects are likely to arise. It also reflects that, whilst significant adverse effects begin to arise at the point where 2,100 dwellings would be delivered in the Service Centres, “*this is compensated by a significant positive impact in the provision of housing.*” The detailed tables at Appendix C of the Submission SA highlight, in any case, that the significant negative impact that arises at this scale of growth (2,100 dwellings) relates to soil resource which, arguably, is a generic effect that is not specific to Service Centres and therefore would only occur elsewhere if the additional growth was distributed in a different manner.

Rather, Appendix G of the Submission SA finds that, for the Service Centres, “*the most critical point for significant effects arising is 3,100 dwellings.*” Therefore, in light of the assessment of each option, it is clear that a scale of growth between 1,600 and 2,100 dwellings is entirely appropriate. As such, CBC’s approach of focussing a level of growth to Service Centres that falls between Options 2 and 3 (at 1,819 dwellings) is quite appropriate, and falls well below the critical point of 3,100 dwellings. Moreover, the nature of the SA’s assessment of discrete growth options (i.e. 1,600, 2,100 and 3,100 dwellings) does not reflect that, in reality, negative and positive effects do not occur at each of those thresholds, but are graded inbetween. In reality, therefore, delivering 1,800 dwellings will moderate the effects that are associated with Options 2 and 3.

Topic Paper 2 (para 4.24) highlights that, following discussions with the Local Education Authority, CBC has identified that the delivery of primary schools is necessary to unlock the proposed level of growth in the Service Centres and that, as a rule of thumb, “*700 new homes are needed to provide for a new 1 form entry primary school.*” Appendix G of the Submission SA has, therefore, considered which of the Service Centre settlements would be most appropriate to accommodate a new primary school, and the level of growth that is required to support that. That found that expanding Barrow upon Soar, Anstey and Rothley will “*give rise to the least adverse impacts and best balance with positive effects*” when compared to other Service Centres.

Thus, the Local Plan has sought to identify a sufficient number of suitable, available and achievable sites to deliver that scale of growth and realise that spatial strategy. In the case of Barrow upon Soar, that includes BHL’s site at ‘Land off Willow Road, Barrow upon Soar’ (Site HA48), which will deliver the primary school required to unlock growth in the settlement.

Therefore, the approach taken to growth in the Service Centres (and Barrow upon Soar specifically) is wholly appropriate and justified, and reflects the settlements’ role and function and the opportunities at hand to enhance existing infrastructure to facilitate sustainable growth. It also realises the benefits associated with directing a higher level of growth to the Service Centres (Topic Paper 2, page 38):

- Securing the provision of new primary schools at Anstey and Barrow-upon Soar and expanded provision to serve Sileby as well as Cossington;
- Securing a more co-ordinated approach to landscaping and green infrastructure provision on larger sites;
- The track record of housing delivery in these locations.

Conclusion

Therefore, it is clear that the proposed spatial strategy and distribution of growth has been derived from a robust methodology that has been consistently applied to consider a comprehensive range of spatial options. The outcome of that, therefore, is informed by a transparent decision-making process that has resulted in a robust and justified spatial strategy. The Local Plan is, therefore, sound in this regard.

Question 2.13:

Policy DS1 sets out that, whilst the housing requirement is 17,776 dwellings, provision is made for **at least** 19,461 new dwellings. BHL welcomes that the plan alludes to the housing supply figure being a minimum figure, which is appropriate given the Government's objective of boosting housing supply in response to the national housing crisis.

With that said, BHL's Matter 4 hearing statement highlights that the plan should provide for a buffer of 20% above its housing requirement to allow for flexibility in its land supply, particularly given that CBC's land supply is reliant on delivery from large and complex sustainable urban extensions and that, due to historic difficulties and delays in the delivery of those sites, CBC has been unable to demonstrate a five-year supply of housing in recent years.

Question 2.14:

As highlighted in BHL's response to Questions 2.11 and 2.16, the spatial strategy has achieved the aim of urban concentration / intensification as far as is appropriate, by focusing the optimal level of growth to each tier of the settlement hierarchy; taking account of a range of complex and inter-related matters that cannot always be considered through a high-level Sustainability Appraisal-led approach. Indeed, optimal growth has been focused to the Principal Urban Area, Loughborough and Shepshed, and the proposed level of growth aims to balance the plan's objective of maximising positive effects / reducing negative effects, whilst also ensuring the deliverability of the spatial strategy and delivering suitable and achievable sites that align with it. That element of the spatial strategy is inherently sustainable and will realise the plan's aims.

To fully meet the Borough's needs, growth has also been focused to its Service Centres. In achieving that, CBC has rightly sought to ensure that the required infrastructure is in place to support the day-to-day needs of the residents of those settlements. For example, the spatial strategy focuses sufficient growth to Barrow upon Soar to support the provision of a new primary school. In turn, that will reduce the need to travel by private car and, when considered alongside any sustainable transport schemes that are delivered to support those developments (pedestrian / cyclist infrastructure, and extended / enhanced bus routes) will prioritise sustainable movements.

As such, the spatial strategy aligns with the plan's aims in terms of urban concentration / intensification and sustainable travel.

Question 2.17:

As discussed in BHL's response to Questions 2.11 and 2.16, the approach taken to ensuring that sufficient school infrastructure is brought forward both to facilitate the growth in Service Centres and alleviate existing capacity issues is sound, and has been justified based on the plan's evidence base; including the SA.

That response also refers to the soundness of the approach taken in identifying the most appropriate settlements to accommodate the provision of new primary schools. That identified that Barrow upon Soar and Anstey could accommodate a new 1 form entry (FE) primary school, and that the Cossington Primary School could facilitate a 0.5 FE extension to support growth in Sileby. That is considered to be an appropriate approach towards planning for the scale of development required, and is justified on the basis of the evidence.

In terms of the delivery of the primary school at Barrow upon Soar, positive discussions between CBC, the Education Authority (Leicestershire County Council) and the promoters of the proposed allocation sites in Barrow upon Soar has resulted in the parties agreeing the principle of an amended strategy for delivering the school. Notably, it is now agreed by key stakeholders that the preferred location of the primary school (and an area for its potential future expansion) is the site at 'Land off Willow Road' (Site HA48), albeit with modified boundaries as set out in BHL's Statement in relation to Matter 6. It is anticipated that a Statement of Common Ground will be agreed and presented to the Inspectors ahead of the hearing sessions.

That school site will, therefore, be delivered by BHL, who will also make an appropriate Primary School Contribution (PSC) towards its construction (based on a pro-rata share of the overall pupil generation). The developers of the other allocation sites in Barrow upon Soar will also make a proportionate contribution to the land and build costs of the primary school. The fine details of the relative timings of those contributions and the school's delivery are being discussed between key stakeholders. However, it is clear the strategy will secure the delivery of the primary school in tandem with residential growth, therefore ensuring that the capacity is available to meet the demand for primary school places when needed. That too is a justified and effective strategy that is, therefore, sound in NPPF terms.