

For and on behalf of
Gloebal Ltd

**Charnwood Local Plan
Examination in Public
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
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1.0 INTRODUCTION

- 1.1 This response to Matter 2 of the Inspectors' MIQs 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 Limited.
- 1.2 SPRU have made submissions on behalf of Gloeal Limited to the Regulation 19 consultation (July – August 2021) on the emerging Local Plan. This statement should be read in conjunction with these submissions (representation numbers PSLP/562 and PSLP/563).
- 1.3 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. The evidence highlights that the sites are being actively promoted and are progressing towards the submission of planning applications. Supporting work to support bringing forward the abovementioned sites, including the preparation of indicative masterplans, further demonstrates that the allocation of the land in question would be justified and effective and that development would be deliverable and developable in the early years of the plan period following adoption.
- 1.4 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.
- 1.5 Nevertheless, there remain a number of issues raised in our previous representations that require modifications to the Draft Local Plan to ensure it meets the tests of soundness. In summary, this Hearing Statement seeks to assist the Inspectors through the response to relevant MIQs and further reinforces the justification for the following proposed suggested modifications in respect of allocations HA33 (Land at Oakley Road) and HA35 (Land North of Hallamford Road and West of Shepshed) and related elements of the spatial strategy:
 - The table of housing numbers included in the table in Policy DS1 should be amended to state that these reflect 'minimum' requirements.
 - The figure for Shepshed Urban Area contained in the table in Policy DS1 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 detailed in our accompanying Matter 6 statement).
 - The table in Policy DS1 should therefore be modified as follows:

	<u>Minimum</u> Number of Homes	Pattern of Development
Leicester Urban Area (Birstall, Syston, Thurmaston)	7,358	38% <u>37%</u>
Loughborough Urban Centre	6,073	31% <u>30%</u>
Shepshed Urban Area	2,334 <u>2,560</u>	42% <u>13%</u>
Service Centres (Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley, Sileby)	2,747	14%
Other Settlements	934	5%
Small Villages and Hamlets	18	0%
Total	19,461 <u>19,690</u>	100%

2.0 ISSUE 1 - ARE THE VISION FOR CHARNWOOD 2037 AND THE PLAN'S OBJECTIVES SOUNDLY BASED AND WILL THEY CONTRIBUTE TO THE ACHIEVEMENT OF SUSTAINABLE DEVELOPMENT?

2.1 Do the Plan's vision and objectives cover the full range of opportunities, challenges and priorities that need to be addressed in the Borough over the Plan period? Is it clear how the policies will help to deliver the vision and objectives over the Plan period?

2.1 No response.

2.2 Will the Plan contribute to achieving sustainable development, including a sustainable pattern of development, as set out at NPPF paragraph 11a and if so, how?

2.2 No response.

3.0 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?

2.3 Is the Settlement Hierarchy Assessment (EB/DS/3) based on a robust methodology and relevant criteria in relation to the availability of and access to services and facilities?

3.1 The Settlement Hierarchy Assessment appears to be based on a robust methodology and the resulting hierarchy accurately reflects the availability of and access to services and facilities in the settlements that have been assessed.

2.4 How has the Settlement Hierarchy Assessment informed the development strategy in Policy DS1?

3.2 The development strategy set out in Policy DS1 is consistent with the settlement hierarchy, with the largest and most sustainable settlements being apportioned the majority of the growth.

2.5 Are the settlements included within the settlement hierarchy categories of Urban Centre (Loughborough), Urban Settlement, Other Settlements and Small Villages or Hamlets in the Countryside justified? (Table 4 of the Plan). Does the settlement hierarchy appropriately reflect the role and function of these settlements?

3.3 The Settlement Hierarchy Assessment appears to be based on a robust methodology and the resulting hierarchy appropriately reflects the role and function of settlements.

2.6 How does the ‘Leicester Urban Area’ relate to the settlement hierarchy in Table 4?

3.4 No response.

2.7 The Plan also refers to ‘Urban Areas’, for example in paragraph 3.206. What areas are being referred to and is this clear?

3.5 No response.

2.8 Should the Sustainable Urban Extensions be identified as urban settlements in the hierarchy?

3.6 No response.

2.9 Why have small villages or hamlets been identified as a separate category in the settlement hierarchy if they are subject to the same policy approach as the countryside in Policy C1?

3.7 No response.

2.10 Are the limits to development based on a robust and credible evidence base and are they appropriately drawn on the Policies Map?

3.8 The Limits to Development are not clearly defined on the Policies Map. These limits should reflect any amended site boundaries that are agreed through the Examination process, such as the amendments that we are proposing to the boundaries for sites HA33 and HA35.

4.0 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?

- 4.1 A range of scenarios were tested through the SA and considered a spectrum of development patterns across the Borough including a focus urban approach, a dispersed approach and a new settlement approach.
- 4.2 On the evidence available, we consider that the approach taken to distributing growth in line with Policy DS1 is justified and represents the most suitable and sustainable option for growth in the Borough.
- 4.3 The Council’s evidence indicates that the justification for a greater proportion of new dwellings being delivered in the Service Centres, against the hybrid approach, is related to the need to provide new or expanded Primary Schools and a desire to prevent smaller settlements having to accommodate more significant levels of growth. In Urban Settlements such as Shepshed, the delivery of a more strategic scale growth and associated infrastructure including a new 3 form entry primary school is fundamentally supported.

2.12 Does Policy DS1 set out a clear approach to the distribution of future housing and employment development across the different settlements in the hierarchy?

- 4.4 Policy DS1 is considered to set out a clear approach to the distribution of future housing across the different settlements in the hierarchy.

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

- 4.5 The housing requirement set out in Policy DS1 should be expressed as absolute minimum. The planned housing need of 17,776 homes, as confirmed at paragraph 61 of the NPPF 2021, is a minimum, not a maximum, and should not be regarded as a restriction to otherwise sustainable development from coming forward.
- 4.6 The table in Policy DS1 sets out the ‘number of homes’ that are anticipated will be developed in each of the main settlements, groups of settlements and urban areas across the Plan period.
- 4.7 This table should therefore instead identify these figures as ‘Minimum number of homes’ to be delivered, as the overall housing requirement is a minimum figure. The capacity figures identified in the individual site allocation policies can also only be indicative figures which may increase slightly at application stage, subject to relevant design, density and sustainability considerations.
- 4.8 In accordance with our 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.
- 4.9 The table set out in the policy wording for Policy DS1 should therefore be amended as follows:

	Minimum Number of Homes	Pattern of Development
Leicester Urban Area (Birstall, Syston, Thurmaston)	7,358	38% 37%
Loughborough Urban Centre	6,073	31% 30%
Shepshed Urban Area	2,334 2,560	12% 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	19,461 19,690	100%

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?

4.10 The distribution of housing development set out in the table in Policy DS1 is supported, in particular with regard to the growth allocated at Shepshed, which as an Urban Settlement is considered to be a sustainable location for growth. Land as proposed to be allocated under sites HA33 and HA35 in particular is situated in close proximity to the centre of Shepshed and their development will enable travel by sustainable modes of transport.

2.15 Is Policy DS1 justified in allowing for development adjacent to settlement limits in circumstances where a five year supply of deliverable housing land cannot be demonstrated? How would proposals be expected to accord with the pattern of development set out in the table in Policy DS1?

4.11 No response.

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?

4.12 No response.

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?

4.13 No response.

2.18 What is the relationship between the Service Centre category in the settlement hierarchy and the District Centre/Local Centre designation? Is there any potential for confusion about the role of the Service Centres?

4.14 No response.

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?

4.15 No response.

2.20 How would ‘small scale’ development in bullet two of the policy be defined and is the policy clear and effective in this regard?

4.16 No response.

2.21 Why are proposals for new services and facilities required to meet a ‘proven local need’ (bullet four)? What would be the harm in approving new services and facilities without a demonstration of proven local need?

4.17 No response.

2.22 Should the policy give more support to development outside the Development Limits on brownfield or underused land?

4.18 No response.

2.23 How would ‘small scale new built development’ in bullet two of the policy be defined and is the policy clear and effective in this regard?

4.19 No response.

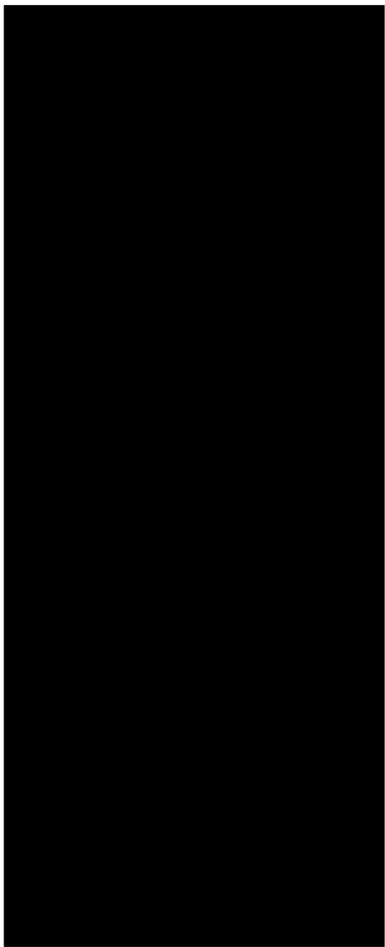
2.24 What is the justification for requiring new services and facilities to meet a ‘proven local need’ (bullet three)? What harms would arise if new services and facilities are approved without a demonstration of proven local need?

4.20 No response.

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?

4.21 The development strategy as currently proposed in the Plan is broadly supported. However, it is necessary to ensure that the housing numbers included in the table in Policy DS1 reflect ‘minimum’ requirements for the purpose of achieving a sound plan.

4.22 Modifications to the table in Policy DS1 should be made in accordance with the changes set out in paragraph 4.9 above.



RTPI
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