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Our ref: 60628/

Your ref:

Dear Ian

Charnwood Local Plan Examination - Response to Matter 2

This statement to Matter 2 (Vision, Objectives, Sustainable Development, and the Development Strategy) of the examination of the Draft Charnwood Local Plan (“DCLP”) is submitted by Lichfields on behalf of St Philips Land Limited (“St Philips”).

It follows the submission of representations to the Regulation 19: Pre-Submission Draft of the Charnwood Local Plan (July 2021) in respect of land off Cotes Road, Barrow upon Soar, in which St Philips has land interests. For reference, the representations comprising these proposed changes were identified under Representation ID **PSLP/618**.

It should be clarified that separate representations were made by Marrons Planning on behalf of St Philips, Rosconn Strategic Land, William David Homes and Swithland Homes under Representation ID PSLP/633. However, this representation set out their joint position on Policy DS3 (HA49) with each party making wider representations to the plan through individual representations.

The National Planning Policy Framework (‘NPPF’) outlines that during the examination process a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspector’s questions which set out why we consider changes to the DCLP are necessary to ensure the soundness of the Plan.

Issue 3 – The Development Strategy

Question 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?*

The distribution of development in Policy DS1 **is** justified by the evidence and all options for the level and distribution of growth **were** tested through the Sustainability Appraisal (“SA”).

Table 1 of the DCLP identifies a total housing supply of 10,603 dwellings whilst Table 2 confirms that a total of 8,951 dwellings are “*to be found*”, which in combination would result in a total housing supply figure of 19,554 dwellings. However, it should be noted that Policy DS1 seeks the provision for at least 19,461 dwellings against a proposed housing requirement of 17,776 dwellings.

Paragraph 4.2.30 of the Sustainability Appraisal confirms that “*the Council consider it reasonable to continue to test housing growth at the two scenarios of 8100 and 15,700 homes*”.

SA Table 4.3 sets out the different approaches to distribution which have been tested against the two housing growth scenarios. However, the SA later sets out that a “*hybrid option was developed by the Council taking into account the strengths and weaknesses of the refined spatial options*” (paragraph 4.3.41) equating to 7,800 dwellings.

Furthermore, the SA adds that “*the Council has concluded (on the basis of the evidence) that the lower growth scenario is preferable, but that a margin of flexibility should be built-in to the supply*” (paragraph 4.5.2) resulting in a higher hybrid growth option of 11,700 dwellings (paragraph 4.5.1).

Later in the SA, Appendix D sets out the appraisal of these refined options comprising 7,800, 11,700, 8,100 and 15,700 dwellings, confirming that all the housing growth options **were** tested through the SA.

In terms of the preferred growth level option, the SA confirms that the Council determined it should plan for a total of 19,554 dwellings (paragraph 4.6.2) leaving a “*to be found*” figure of 8,951 dwellings. Although this does not align with any of the four growth options tested, the SA (paragraph 4.6.1) confirms that the key reasons for this adjustment were:

- In response to consultation feedback suggesting that a higher level of growth should be planned for.
- To increase flexibility in the delivery of housing needs, which would address concerns about deliverability.
- To respond to changes in the calculation of housing needs, which has increased since the preferred options stage.

Given this discrepancy, the SA confirms that “*the aim at this stage was not to establish a totally new strategy*” but rather that “*the focus was upon addressing where additional housing could be delivered*”

most sustainably, whilst maintaining the broad distribution of growth (which had been tested extensively to inform the Draft Plan)” (paragraph 4.6.3).

The justification for a greater proportion of new dwellings being delivered in the Service Centres compared with the ‘hybrid’ option tested is set out at paragraph 4.7.9:

“The overall amount of homes directed towards Service Centres was guided by the hybrid strategy. Expansion of Anstey and Barrow by 700 homes accompanied by a new primary school were considered to give rise to the least adverse impacts and best balance with positive effects, when compared with expanding Sibley by a similar amount of new homes.”

Principally, St Philips wholly supports the Councils approach towards the testing of the level and distribution of growth through the SA, and the justification for a greater proportion of new dwellings being delivered in the Service Centres.

Question 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?

Yes. In particular, the distribution of 14%, or 2,747 dwellings, of the total housing supply towards Service Centres, including Barrow upon Soar, will contribute to achieving the overall stated aim of Policy DS1. Indeed, the supporting text for Policy SC1 (Service Centres) confirms:

- Paragraph 3.189: *“All Service Centres have good road and public transport links to larger settlements for access to employment and higher order goods and services.”*
- Paragraph 3.199: *“Our Service Centres are the most sustainable locations for growth outside our urban centres and urban areas...”*
- Paragraph 3.205: *“All Service Centres benefit from access to frequent public transport services to larger urban areas of Leicester and Loughborough. The proximity to larger centres also means that cycling can be an option, making use of National Cycle Route 6, a long-distance route passing through the Soar Valley.”*

Given the above, the distribution of housing growth towards the Service Centres and particularly Barrow upon Soar will minimise the need to travel, particularly by private car, and prioritise sustainable modes of transport.

Policy SC1 - Service Centres

Question 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?

Table 5 of the DCLP confirms that a total of 2,747 dwellings are directed towards Service Centres, comprising an identified supply of 928 dwellings and additional new supply of 1,819 dwellings.

Whilst SA paragraph 5.1.2 suggests there is potential for negative effects above 1,600 dwellings at Service Centres, it is later highlighted that “*the most critical point for significant effects arising is 3100 dwellings*” (paragraph 5.1.3). Additionally, it notes that at a level of 2,100 dwellings, “*the only significant negative effects are in relation to soil resources*” but that “*this is the point that significant positive effects arise for housing though*” (paragraph 5.1.4).

On this basis, it is recognised that “*Service Centres will have similar effects across most growth options under 2,100 dwellings*” (paragraph 5.1.5). Whilst the overall supply of 2,747 dwellings towards the Service Centres would be marginally larger than the 2,100 dwellings tested, it is considered that “*a small increase in growth in the service centres would be unlikely to change the overall conclusions*” (paragraph 5.1.6).

Consequently, St Philips supports these conclusions and considers that the level of growth being directed to Service Centres **is justified** on the basis that the overall supply would not exceed 3,100 dwellings where significant negative effects would arise.

Question 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?

The *Development Strategy and Site Selection Topic Paper* (July 2021, updated December 2021) (Ref: TP-2) sets out the Council’s approach to directing housing growth towards Barrow upon Soar whilst sufficiently addressing the lack of capacity in its primary school provision.

The Topic Paper first identifies the opportunity for the delivery of a new primary school at these Service Centres:

“Anstey, Barrow and Sileby had sufficient land available in which to make a new primary school viable. Of these Service Centres, site proforma information indicated that the expansion of Barrow upon Soar would accord more strongly with the Council vision and objectives as it would have least impact on landscape character and settlement identity.” (paragraph 4.27)

Appendix B describes the site selection method which was informed by the framework provided by the hybrid overall distribution strategy and further sustainability appraisal work to establish the capacity for new development within each settlement tier. In the case for Barrow upon Soar, the site selection commentary sets out:

“It is not possible to accommodate additional growth at Barrow-upon-Soar without providing a new primary school as the current school is at capacity and unable to expand. As a result, the only development strategy option that would allow for development at Barrow would be to allocate the 700 homes that are necessary to support the delivery of a new 1 form entry school.” (page 34)

Consequently, the allocation of housing growth at Barrow upon Soar **is justified** on the basis that it would indeed address the lack of capacity in its primary school provision as it would provide a sufficient level of growth to support the delivery of a new 1 form entry school.

In terms of the arrangements for delivering this new primary school, Policy DS3 includes a general requirement that developments are cohesive and integrated with other allocations set out in the Plan including in relation to the provision of new schools and other infrastructure. In this respect, the site specific policies for the Barrow Upon Soar allocations set out that the developers of each site will contribute to the reasonable costs of the provision of a new 1FE primary school located at site HA49.

This topic has subsequently been the subject of detailed and collaborative discussions between the Council's Policy Team, Leicestershire County Council's (LCC) education officers and the Site Promoters to develop suitable delivery mechanisms to allow the new primary school to come forward alongside housing delivery. These conversations have formed the basis for a strategy that will see each site promoter pay a proportionate share towards the land and build cost of delivering a new 1FE primary school in the settlement, based on their pro-rata share of pupil generation. The strategy will also ensure that the commencement of development is aligned with the timely provision of new education provision.

There are some minor details of timing that will need to be discussed with the Local Education Authority, however all parties are aligned on the fundamental principles that are required to see to see the new primary school project come to fruition to support the Local Plan's strategy, and the Site Promoters agree to the proposal for land and build costs to be proportionally shared between them.

As a consequence of the discussions between the site promoters, LCC and the Council, it has now been concluded that the preferred location in which to provide a new primary school site would be HA48 Willow Road, as opposed to HA49 Cotes Road. It is therefore suggested that a Main Modification is now required to amend the relevant Barrow upon Soar allocation policies to reflect this change, and to also amend the proposed allocation boundary for site HA48 Willow Road accordingly.

Yours faithfully



Jon Kirby
Senior Director