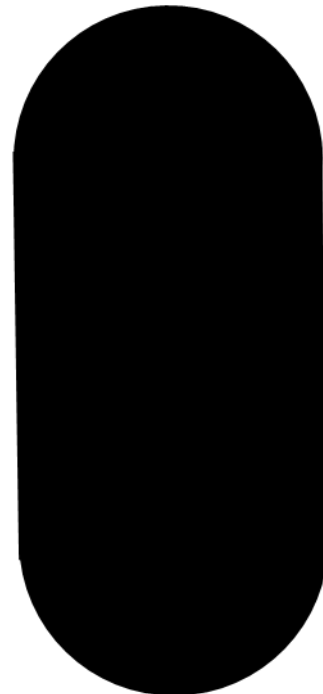
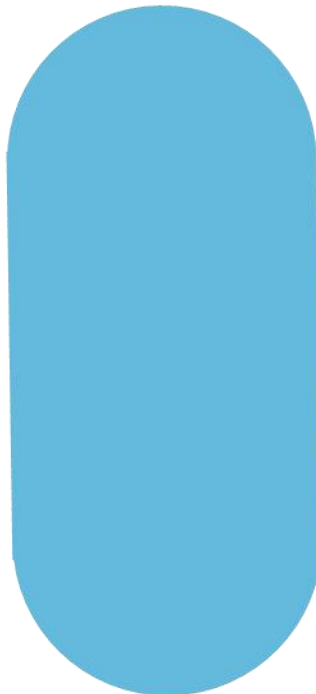


**WRITTEN STATEMENT IN RESPECT OF THE  
CHARNWOOD LOCAL PLAN 2021-37  
EXAMINATION**

**MATTER 2- VISION, OBJECTIVES, SUSTAINABLE  
DEVELOPMENT AND THE DEVELOPMENT  
STRATEGY**

On Behalf of Richborough Estates, the Bowler Family and William  
Davis Ltd



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## 1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Richborough Estates, the Bowler Family and William Davis Ltd, in response to the Inspectors' Matters, Issues and Questions for the examination hearings for the Charnwood Local Plan 2037.
- 1.2 Richborough Estates, the Bowler Family and William Davis Ltd are promoting land to the south of Loughborough. The land is specifically covered under Policy DS3, site reference HA15.
- 1.3 Both Richborough Estates and William Davis have previously made representations to the Regulation 19 Local Plan consultation.

## 2. MATTER 2- VISION, OBJECTIVES, SUSTAINABLE DEVELOPMENT AND THE DEVELOPMENT STRATEGY

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?

- 2.1 It is our view that the Charnwood Local Plan 2021-2037 Pre-submission Draft (the Local Plan) sets out an appropriate settlement strategy and, generally, distributes growth appropriately through the hierarchy by way of a range of sites including those which are smaller and likely to contribute to a deliverable supply of land.
- 2.2 The MIQs ask (Issue 2 question 10) whether the limits to development are based on a robust and credible evidence base and are they appropriately drawn on the Policies Map.
- 2.3 EB/DS/2 Charnwood Settlement Limits Draft Assessment sets out *“principles and criteria ... to provide a methodical approach and ensure that the draft settlement limits have been prepared in a clear, transparent and objective manner. In effect, these principles and criteria provide the*

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*basis for judgements to be made and for specific settlement limits to be understood'* (paragraph 2.1).

- 2.4 Principle 1 says that Settlement boundaries will include, inter alia:
- C) *Planned allocations in development plan documents where a boundary has been identified.*
- 2.5 It appears from the Policies Map 1 (SD/3) that none of the allocations proposed by Policy DS3 of the Local Plan have been included within the draft settlement boundaries. Exclusions from the settlement boundaries are set by Principle 2 and it might be noted that none of the criteria promote a judgement that would see allocations being placed outside of the settlement boundaries.
- 2.6 Paragraph 16d of the Framework says that plans should contain clear policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As presented, the allocations sit outside of the settlement limits where the Policies C1 Countryside and EV1 Landscape provide the strategic policy framework.
- 2.7 The primary objective of Policy C1 is to protect the largely undeveloped character of the countryside. References to development which will be supported restricts new built development to small scale, do not include allocations for development and the only references to residential development seek to manage isolated homes in the countryside.
- 2.8 Similarly, Policy EV1 concerns itself with the careful management of development to protect the Borough's distinctive landscape and requiring new development to maintain the separate identities of our towns and villages.
- 2.9 Were the allocations to remain outside of the settlement boundaries and in the countryside there would be a clear tension between Policy DS3 (the allocation policy) and the policy framework for land outside of the settlement boundaries set through Policies C1 Countryside and EV1 Landscape. There may be a suggestion that the allocation policy will set

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the primary decision making framework or that a planning judgement can be taken to determine conflict between Policy DS3 and Policies C1 and EV1. But in such an event, the decision making framework would already be at risk of offending Paragraph 16d of the Framework.

- 2.10 In our view, the settlement boundaries should be amended to include the allocations within the settlement boundaries in accordance with Principle 1: criteria c.
- 2.11 For many allocations there will, of course, be a readily defined defensible boundary or a masterplan that defines the extent of built development. Indeed, the Council has included diagrams (albeit illustrative) for some allocations.

### Issue 3 – The Development Strategy

- 2.12 Richborough Estates and William Davis are preparing planning applications for the central and western parcels on the allocation. A comprehensive, constraints based masterplan being prepared to support those applications which suggests that the policy compliant efficient use of land will deliver around 715 homes. In addition to the Parkers application on the eastern parcel which sought permission for up to 120 homes (P21/0550/2) this would see the allocation deliver 835 homes in comparison to the 723 homes identified by Policy DS3 (HA15).
- 2.13 In our view, the figures in the table in Policy DS1 should be expressed as minimum numbers. Our representation to the Regulation 19 Local Plan considered this matter (paragraphs 4.10 to 4.18) and presented our view that Policy DS3 is not sound in its current form and should be amended. In this respect we would propose that new terminology of approximately or around could be used in respect of yields with a note to say that this should be explored through a constraints led masterplan. To be helpful, additional text could be added through a modification to DS3 to read:

*The final number of dwellings on each of the allocated sites will be established at the planning application stage, following consideration of*

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*site specific detailed design matters and any other relevant planning considerations through a constraints-led masterplan process.*

2.14 We comment above (paragraph 2.7) on the ambiguity caused by reference to small scale in Policy C1 and the tension this has with Policy DS3. Amendments to the settlement boundaries to include the allocations resolves this ambiguity.