



# Charnwood Local Plan Examination in Public

## GC No. 37 Limited (Godwin Group)

Hearing Statement - Matter 2: Vision, Objectives, Sustainable  
Development and the Development Strategy

June 2022

## Quality Control

<b>Project No.</b>	19.011			
<b>Client</b>	GC No. 37 Limited (Godwin Group)			
<b>Title</b>	Charnwood EiP Hearing Statement: Matter 2			
<b>Location</b>	Land South of Ashby Road Central, Shepshed			
<b>File Ref</b>	19.011 Charnwood EiP Hearing Statement Matter 2			
<b>Issue</b>	<b>Date</b>	<b>Prepared By</b>	<b>Reviewed By</b>	<b>Authorised By</b>
1.	26 <sup>th</sup> May 2022	JW	SC	SC

## 1.0 Introduction

- 1.1 This Statement sets out submissions made by Planning and Design Group (UK) Ltd on behalf of GC No. 37 Limited (Godwin Group).
- 1.2 They are submitted in response to the 'Matter, Issues and Questions' (MIQs) for the Charnwood Borough Council Local Plan 2021-37 Examination in Public (identified by the Inspector in May 2022) and relate to Matter 2: Vision, Objectives, Sustainable Development, and the Development Strategy.
- 1.3 They should be read in conjunction with our previous representations, including extensive supporting evidence, made throughout the Charnwood Local Plan drafting and consultation process.
- 1.4 GC No. 37 Limited has an interest in 'Land south of Ashby Road Central, Shepshed' which is proposed for allocation in the Plan under policy HA41. GC No. 37 Limited has also submitted an outline planning application for up to 50 dwellings on the site (ref: P/21/2045/2), which remains under consideration at time of writing.
- 1.5 Not every question has been answered – only those which are relevant to GC No. 37 Limited's case and previous representations.

## 2.0 Matter 2: Vision, Objectives, Sustainable Development, and the Development Strategy

**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?**

*Q2.1 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 GC No.37 Limited support the Plan's vision and objectives as they contribute towards the delivery of sustainable development and seek to achieve the objectives of the National Planning Policy Framework ('NPPF'); to 'boost significantly' the supply of homes, build a strong, competitive economy and balance environmental protection and enhancement.
- 2.2 The vision and objectives emerge from analysis of the Borough's challenges and priorities, in particular the need to address population growth.
- 2.3 The vision and objectives can be effectively met through the application of policies in the Plan. The Plan includes a delivery mechanism directly targeted at meeting the objectives and in this way ensuring that the Plan will be effective in delivering the wider vision.

*Q2.2 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?*

- 2.4 Yes. The Plan provides for growth in sustainable areas (those with services and facilities including transport links which do not rely on the private motor vehicle), focussing development towards urban areas (urban concentration and intensification) with more limited growth in other, rural areas as necessary to support services and facilities.
- 2.5 The Sustainability Appraisal includes and applies a methodology that has been developed from an analysis of the key sustainability issues arising from an evaluation of baseline evidence and in turn supports the achievement of sustainable development and a sustainable pattern of development.

- 2.6 The development strategy increases the scope for sustainably located sites to come forward for development, to meet future growth needs across Charnwood Borough.

**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?**

*Q2.3 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?*

- 2.7 The Settlement Hierarchy Assessment (2020) sets out a clear methodology for establishing the hierarchy, taking into account a variety of key relevant factors including population size, travel to work patterns, provision of services and facilities including access to public transport, and localised spending. It is robust and supports the positive preparation and justification for the settlement hierarchy as set out in the Plan.
- 2.8 The Settlement Hierarchy Assessment identifies Shepshed falling within the Government's definition of an urban settlement and scores second highest behind Loughborough in the settlement audit summary, firmly establishing the sustainability of the settlement and in turns its position within the proposed settlement hierarchy.

*Q2.4 How has the Settlement Hierarchy Assessment informed the development strategy in Policy DS1?*

- 2.9 The Settlement Hierarchy Assessment helps the Council provide for development on a greater number of sites of varying size across a wider range of sustainable settlements. This approach has proven to be effective in the examination of Local Plans nationally and is considered to best support the critical objective of the NPPF to 'boost significantly the supply of housing'. It is also a much more efficient and sustainable way of delivering growth, reducing the burden of additional infrastructure and providing a wider choice of housing.
- 2.10 Paragraphs 2.42 – 2.54 set out clearly how the settlement hierarchy has informed the development strategy, with regard to infrastructure provision, settlement identity constraints and landscape issues, ultimately directed at achieving the plan objectives. A clear thread between policy and objectives is established.

*Q2.5 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?*

- 2.11 Yes. As the second largest urban settlement after Loughborough, offering a range and choice of services, facilities and employment opportunities that meet the day to day needs of residents, Shepshed is one of the most sustainable locations for growth in the Borough. Appropriately, this is reflected in the Local Plan Settlement Hierarchy, and the sequential approach to the apportionment of new homes in Policy DS1.

*Q2.7 The Plan also refers to 'Urban Areas', for example in paragraph 3.206. What areas are being referred to and is this clear?*

- 2.12 The Plan should instead refer to Urban Centre or Urban Settlements consistent with the settlement hierarchy, for the avoidance of doubt.

*Q2.10 Are the limits to development based on a robust and credible evidence base and are they appropriately drawn on the Policies Map?*

- 2.13 Whilst the limits to development mainly follow the existing built development edge unless the area is allocated for a sustainable urban extension, it is unclear how they are based in relation to other site allocations i.e., whether the proposed allocations sit within or adjoining the defined limits. The Limits to Development assessment dates from 2018, prior to many of the allocations being identified, including HA41. The Limits to Development should be reviewed to ensure all allocations are included.

### **Issue 3 – The Development Strategy**

*Q2.11 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?*

- 2.14 The 'Development Strategy and Site Selection Topic Paper' explains at page 38 that:

*"There are several advantages, however, associated with directing this higher level growth to Service Centres:*

- *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.”*

2.15 This approach is supported by GC No.37 Limited.

*Q2.12 Does Policy DS1 set out a clear approach to the distribution of future housing and employment development across the different settlements in the hierarchy?*

2.16 Please see the response to question 2.4 above.

*Q2.13 Should the figures in the table in Policy DS1 be expressed as minimum numbers?*

2.17 Yes, it is common practice for Local Plans to make clear that housing targets should not be seen as ‘ceilings’ to development. This helps with the Government’s objective (see Paragraph 60 in the NPPF) to significantly boosting the supply of homes by providing flexibility.

*Q2.14 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?*

2.18 Yes. The distribution strategy is based on the settlement hierarchy which helps steer development towards the largest and most sustainable settlements.

*Q2.15 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?*

2.19 Policy DS1 is justified; it simply reflects the requirements of national policy in respect of five year housing land supply and the presumption in favour of sustainable development (NPPF paragraph 11).

*Q2.25 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?*

2.20 Yes, overall GC No.37 Limited believe that the Plan’s vision and objectives contribute to the achievement of sustainable development and that the development strategy is

justified by the evidence and positively prepared. On this basis the Plan is sound and no main modifications are proposed.

**Planning and Design Group**

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