

Charnwood Local Plan Examination. Matters, Issues and Questions.

Statement on Behalf of Redrow Homes, Davidsons
Developments and the Helen Jean Cope Charity (PSLP 598).

Matter 2: Vision, Objectives, Sustainable Development and The
Development Strategy

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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?

- 1.1. Whilst the Vision's recognition of the role of Loughborough as the main Urban Centre is supported, there are serious concerns that the vision is then not translated into the subsequent strategy in terms of the distribution of development.
- 1.2. The available evidence does not support either the vision for Shepshed or the scale of growth proposed to be directed to it as part of the spatial strategy. Similarly, the plan fails to demonstrate how the scale of growth proposed to be directed towards Shepshed is sustainable and how it will support Growth Plan proposals for the International Gateway and secures regeneration of the town.
- 1.3. The Vision fails to properly recognise the role of Loughborough as the main urban centre, and this vision should then be translated into a distribution strategy that directs most growth to Loughborough as the most sustainable urban centre.
- 1.4. The spatial strategy has instead directed a significant proportion of growth to Shepshed, a significantly less sustainable location for development, discounting without sufficiently robust evidence or assessment opportunities for sustainable development on the edge of Loughborough, such as land south of Watermead Way, Loughborough.

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?

- 1.5. The Settlement Hierarchy for the plan is set out in Table 4 of the Submission Draft. The Settlement Hierarchy Assessment (EB/DS/3) seeks to explain the methodology for identifying the settlement hierarchy. Loughborough is identified as an urban centre and the most sustainable location for growth in the Borough. Shepshed, along with Birstall, Syston and Thurmaston are then identified as urban settlements, having a range of services to meet day to day needs and physically or functionally forming part of a wider Leicester or Loughborough Urban Centre. The Key to the Key Diagram at page 25 to the Plan shows a combined reference to the Loughborough Urban Centre and Shepshed Urban Area. The Sustainability Appraisal also appears to treat Loughborough and Shepshed as a single urban area for part of the assessments and at paragraph 4.2.12 there is reference to Loughborough and Shepshed being in the second tier of the settlement hierarchy.
- 1.6. It seems that this approach has resulted in the erroneous consideration of locations on the edge of Shepshed as being equally sustainable as locations on the edge of Loughborough, with suitable sites on the edge of Loughborough inappropriately discounted. This is clearly not the case and is not borne out by the evidence, including evidence of available services and facilities included in the Settlement Hierarchy Assessment (EB/DS/3). In our representations we made submissions about the clear differences between Loughborough

and Shepshed in sustainability terms. Some key points can be made on the relationship between Loughborough and Shepshed, their position in the settlement hierarchy and the implications then for the appropriate scale of growth to be directed to them;

- Loughborough has a population of some 60,122, well above Shepshed's population of 13,505;
- The settlements are physical separated;
- Only some 27% of Shepshed's economically active population work in Loughborough, not significantly higher than other settlements such as Barrow Upon Soar and Quorn (fig 5 of EB/DS/3). Figure 4 of the Settlement Hierarchy Assessment shows that 11% of Shepshed residents travel to North West Leicestershire to work and 7% to Leicester. Only 3% of Loughborough's residents work in Shepshed. This challenges the suggestion that the settlements function as a single urban area;
- Loughborough has significantly more services and facilities available than Shepshed;
- The affordable housing need is focused in Loughborough with 166 affordable homes a year required in Loughborough compared with 30 in Shepshed (Housing Needs Assessment, 2020 (EB/HSG/1).
- The western edge of Loughborough is some 2.85 kilometres from Loughborough Town Centre, the western edge of Shepshed is more than 7 kilometres from the Town centre.

1.7. The proposal to direct some 21% of the additional housing required towards Shepshed is not adequately justified and does not reflect the settlement hierarchy and the function of Loughborough as the main urban centre and the most sustainable location for growth. Opportunities for additional growth on the western edge of Loughborough represent clearly more sustainable opportunities for growth in accordance with the settlement hierarchy. The spatial distribution should be revisited.

1.8. We have made the case for additional provision to meet identified unmet needs and provide sufficient flexibility in the plan. There is scope to accommodate a large proportion of this additional requirement adjoining Loughborough, wholly in accordance with the settlement hierarchy.

Issue 3 – The Development Strategy

1.9. Policy DS1 sets out the proposed distribution strategy between 2021 and 2037, with the table in the policy setting out the overall distribution of development over the plan period to the different levels in the settlement hierarchy.

1.10. It is also informative to look at the proposed distribution of the 8,858 new homes proposed for allocation to meet the Submission Draft Plan's identified housing need. This was considered in our representations on the Submission Plan. Table 1 below looks at the distribution of proposed new housing sites proposed for allocation in Policy DS3, excluding the Sustainable Urban Extensions carried forward from the previous Core Strategy.

Table 1 – Submission Draft Plan Distribution

Settlement	Housing Supply (Commitments)	%	Distribution of New Homes	%
Leicester Urban Edge	5,254	50%	2,104	24%
Loughborough	3,831	36%	2,242	25%
Shepshed	453	4%	1,878	21%
Service Centres	928	9%	1,819	21%
Other Settlements	119	1%	815	9%
Small Villages/ Hamlets	18	0%	0	0%
Total	10,603	100%	8,858	100%

- 1.11. This shows that some 21% of new housing allocations are directed towards Shepshed – 1,878 new dwellings compared with 2,242 dwellings for Loughborough. This does not reflect the settlement hierarchy identifying Loughborough as the main urban centre or the evidence that demonstrates that the focus for affordable housing need is in the town.
- 1.12. The proposed distribution to Shepshed is in part argued to be justified on the basis of the regeneration benefits of further significant housing growth at Shepshed. There is no evidence presented to show that the significant growth already accommodated in Shepshed has delivered such benefits or that the additional provision will. The Council's Sustainability Appraisal cautions that there are no guarantees that positive benefits will be felt by deprived communities or that new residents will support retail and leisure in the town centre (paras 7.10.10 and 7.13.29, SD/5).
- 1.13. The focus of growth at Shepshed is therefore not consistent with the proposed settlement hierarchy and means that the plan ignores the opportunities available for a strategic development solution on the south/ south-western edge of Loughborough. This distribution is less likely to minimise the need to travel by private car or prioritise the use of sustainable modes. Development on the western edge of Loughborough would be well connected to the wide range of services in the town easily accessible by sustainable modes including cycling, walking and public transport.
- 1.14. The currently adopted Core Strategy Policy CS1 refers to the provision of **at least** 13,940 dwellings over that plan period 2011-2028, with the proposed spatial distribution figures also expressed in these terms – at least 5,500 homes to the Leicester Principal Urban Area, at least 5,000 homes to Loughborough and Shepshed, at least 3,000 homes to Service Centres and at least 500 homes to Other Settlements.

- 1.15. As framed, Policy DS1 refers to specific figures. The policy should be amended to reflect the wording used for the scale and distribution of housing in the currently adopted Core Strategy Policy. This is a standard approach adopted in local plans and avoids the difficulties that can arise through the implication that the proposed figures represent a maximum provision.
- 1.16. In terms of the reference in the policy to the circumstances where proposals will be permitted where there is a five-year supply shortfall, it is not clear how the criterion requiring accordance with the pattern of development set out in the Table in the policy would be applied in practice. This could be interpreted as using the percentage distribution as a bar, above which development to address five-year supply shortfalls would be resisted. This approach would unnecessarily constrain the delivery of sustainable development proposals in circumstances where there would be a presumption in favour of sustainable development in accordance with the NPPF. This part of the policy needs to be re-drafted and the practical implications and application clarified.



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