

## 1. Background

- 1.1. This hearing statement has been prepared on behalf of Redrow Homes East Midlands (“Redrow Homes”).
- 1.2. Redrow Homes are working in partnership with owners of the land off Ratcliffe Road, Sileby, which is not identified for development in the submitted version of in the Charnwood Local Plan.

## 2. 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?

*Q. 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. The thrust of the vision text is clear and would appear to cover the appropriate range of opportunities, challenges and priorities, however, no reference is made directly to a contribution to the achievement of sustainable development in the text of the document. In order to meet paragraph 16 of the NPPF we consider that this should be made explicit.
- 2.2. A main modification to include reference to contributing to the achievement of sustainable development in the vision statement.

## 3. Issue 3 - The Development Strategy

*Q. 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?*

- 3.1. The Development Strategy does not clearly state that the Service Centres should be a focus for growth, beyond Loughborough, to respond to the demand for housing and employment land. To achieve the objective of sustainable development as per the NPPF, it is necessary for the development strategy to also include Service Centres.
- 3.2. A number of growth options were considered, including two hybrid options. The growth options are varied and cover a wide, but overlapping gamut of growth options and it is considered that this represents a positive direction and thorough level of evidence for the final distribution of development under DS1.

Redrow Homes Limited  
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- 3.3. We support the greater proportion of new dwellings being delivered at the service centres, as these represent some of the most sustainable locations for growth in the district, after the largest settlement of Loughborough. However, whilst paragraph 4 on page 20 of the Development Strategy and Site Selection document justifies this to '*enable the provision of new or expanded primary schools necessary to support growth*'. The site selection for Sileby in particular is piecemeal and does not clearly include direct provision for primary school growth – whereas a smaller number of larger site(s) could have a greater enabling impact for school growth including the site for a new primary school.

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

- 3.4. It is our firm belief that restrictions on housing figures can place a restriction to sustainable development on a future site. The appropriate approach is to express housing figures as a minimum although we note that some Planning Inspectors have accepted 'around'.

*Q. 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?*

- 3.5. There is insufficient distinction between the different Service Centre towns – which all have varying provision of sustainable transport links, with only Sileby and Barrow having centrally located railway stations with direct services to main urban centres of Leicester and Loughborough.

- 3.6. Too much weight is apportioned to the urban areas of Leicester and Loughborough with 69% of the total of new homes for the entire borough to 2037 in these areas. A significant proportion of this provision is attributed to the SUEs (8,355 dwellings). The service centres and specifically the more sustainable ones with respect to their proximity to the urban centres and existing or future sustainable modes of transport, could provide a higher proportion of deliverable sites.

- 3.7. Sileby in particular is capable of accommodating significantly more than the 345 dwellings allocated in the draft plan, with fast services to Loughborough in 6 minutes and to Leicester in 16 minutes and better options for walking and cycling given the modest size of the existing urban area.

*Q. 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?*

- 3.8. We do not agree with the criteria set out for consideration in the absence of a five-year housing land supply. Policy DS1 (or any other local plan policy) is not the place for such criteria given the NPPF covers the criteria of decision making when a five-year housing land supply is absent.
- 3.9. In trying to control development under those circumstances we believe that the policy is in not consistent with the aims of Paragraph 11.(d) of the NPPF and could prevent the delivery of sustainable development. The criteria in the policy would therefore be in conflict with paragraph 35.(d) and would therefore fail the test of soundness.
- 3.10. On this basis the criteria should be removed from the policy DS1.
- Q. 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?*
- 3.11. Whilst the evidence demonstrates that negative impacts would increase as the quantum of proposed housing increases the table at paragraph 5.1 also shows significant strong additional benefits when the number of dwellings at the Services Centres increases. So the approach chosen, that is one which avoids harms, would on balance also fail to provide significant benefits.
- 3.12. It seems as though only half the evidence (i.e. not the benefits) has been taken into account when trying to justify the lower numbers at Service Centres, when a higher figure of 3,100 homes would result in several clear benefits to housing, the Local Economy and Accessibility.
- 3.13. Furthermore, the evidence for the impacts at lower growth options is questionable given the level of uncertainty indicated in the table. Would it not be more appropriate to have clear and certain positive effects from the proposed levels of development than unknown low level neutral or negative benefits without any outstanding benefits?
- Q. 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?*
- 3.14. The proposed figures for these settlements do not go far enough in their ambition and scope to meet the needs of the communities. Whereas targeted and appropriate development of a larger scale would be able accommodate new school sites to alleviate the existing demand to meet the future needs of residents.