

# Land at Six Hills, Charnwood

Hearing Statement Matter 6  
Representation Number: 569



# Boyer

## Report Control

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## **TABLE OF CONTENTS**

1. Introduction	2
2. Response to Matter 6 Consultation Topics	3

# 1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Knightwood Developments Limited (Representation Number: 569) in regard to the 'Charnwood Local Plan' examination in which the Hearing Sessions are due to recommence.
- 1.2 The below representations provides Knightwood Development's response in relation to Matter 6 – Urban Area Policies, Site Selection, Sustainable Urban Extensions and Housing Site Allocation in Leicester Urban Area, Loughborough and Shepshed, as set out within the recent Matters, Issues and Questions published by the Inspector on the 5<sup>th</sup> December 2022, with particular focus on the site selection process. As per the Inspector's Guidance Note a separate set of representations will be submitted for each Matter wished to be discussed.
- 1.3 These representations are a continuation of the promotion of Knightwood Development's land interest at Land located at Six Hills, Charnwood, Leicestershire.
- 1.4 Paragraph 35 of the NPPF provides the criteria by which emerging Local Plans are found to be 'sound' when subjected to examination; namely that the Local Plan must be positively prepared, justified, effective and consistent with national policy. Our representations are grounded in directing the emerging Local Plan towards those options for housing and economic growth that will result in the emerging Local Plan being found sound, in this regard. It is contended that the options that are not supported in these representations would risk the emerging Local Plan being found unsound, for reasons detailed below.

## 2. RESPONSE TO MATTER 6 CONSULTATION TOPICS

### MATTER 6 – URBAN AREA POLICIES, SITE SELECTION, SUSTIANABLE URBAN EXTENSIONS AND HOUSING SITE ALLOCATION IN LEICESTER URBAN AREA, LOUGHBOROUGH AND SHEPSHEAD

#### Issue 2: The Site Selection Process

**6.7 Is the site selection process for the proposed housing allocations soundly based, including the testing of reasonable alternatives? How have the findings of the Sustainability Appraisal informed the site selection process? Are the reasons for selecting allocated sites and rejecting others clear and justified and where are they documented?**

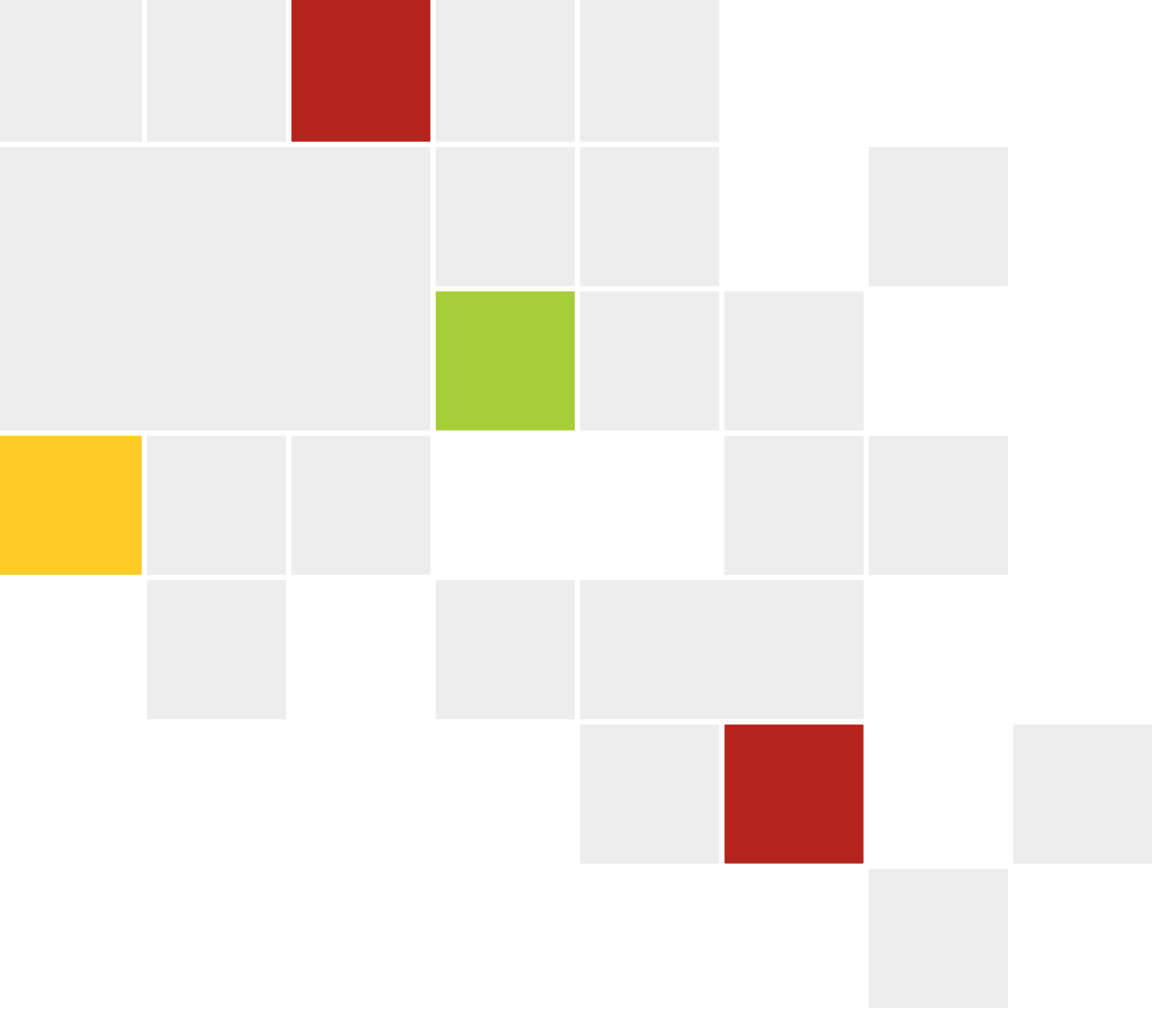
- 2.1 In line with Paragraph 32 of the NPPF which states a relevant Substantiality Appraisal should be utilised to help inform the preparation of a local plan. This appraisal should help to demonstrate relevant economic, social and environmental objectives and how these are to be best addressed. The site selection process for the Charnwood Local Plan has been informed by an appraisal and therefore is soundly based.
- 2.2 As per Charnwood's Development Strategy and Site Selection Topic Paper (Ref TP/2) this states that the findings from the Sustainability Appraisal have been used to inform reasonable alternatives and the scale / distribution of growth. Although this is the case the SA (Exam 47a) has not been produced using the most up to date figures.
- 2.3 As per our previous submission (September 2022 in relation to Matter 10) the use of reasonable alternatives as set out within the Sustainability Appraisal (Exam 47a) is unjustified as based off an unmet need figure of 15,900 dwellings rather than the higher identified unmet need figure of 18,700 dwellings as outlined within the Housing and Economic Needs Assessment (HENA).
- 2.4 We are concerned that the figures tested by the Council within their Sustainability Appraisal do not take into account the scale of growth that is being planned for in the Local Plan. The Charnwood Development Strategy and Site Selection Topic Paper (Ref TP/2), includes a low, high and intermediate option for growth in paragraph 3.2. Housing targets within these options are between 8,100 homes and 15,700 homes.
- 2.5 As detailed within our representations submitted in August 2021 and September 2022, the local authorities and service providers across Leicestershire have been fundamentally aware that there is a need to increase housing numbers across the Housing Market Area. Due to this known shortfall of housing across Leicester and Leicestershire, it is difficult to understand why the Council in their options for growth chose a "high" option which was always likely to need exceeding.

- 2.6 Evidence has shown that the housing numbers across Charnwood and the Leicestershire authorities is to be increased as set out in the Inspectors' Letter on Unmet need published in November 2022 (Ref Exam 55). It is, however, unclear as to how the Council in their Sustainability Appraisal work and site selection considerations have reacted to the increase in housing requirement.
- 2.7 In our view it is unjustified to simply follow the same approach with a higher figure as this does not provide opportunity for environmental, social or economic considerations to be taken into account or additional alternatives to be reasonably and objectively considered as part of the Local Plan preparation stage.
- 2.8 Evidence base document Exam 47a provides a Sustainability Appraisal Report for Leicester and the Leicestershire Authorities in relation to the unmet housing and employment needs from Leicester City. As already identified the local authorities across Leicestershire have been working together to prepare a Statement of Common Ground to address how the unmet need will be planned for across the housing market area and the functional economic area.
- 2.9 We consider that the collaborative approach to be positive, but question why the Sustainability Appraisal work and the options for growth within this were not part of the Charnwood Local Plan preparation stages. The approach outlined in the Statement of Common Ground between authorities and the Sustainability Appraisal run the risk of undertaking plan making which is outside of the statutory requirements to plan preparation as outlined in legislation and the NPPF. As a result, the approach to site selection is not justified, nor is it in accordance with national policy as per the tests of soundness in the NPPF.
- 2.10 It is clear that large scale strategic sites need to have been a key part of the individual and combined thinking of Charnwood and the authorities across Leicestershire at all stages of their plan preparation.

**6.11 The Annual Monitoring Report (SD/17) at para 7.24 says that the deficit in housing completions against the requirement in the adopted Core Strategy is as a result in delays in the delivery of the Sustainable Urban Extension sites. How will the Plan address this? What interventions are necessary and have these been secured?**

- 2.11 The Annual Monitoring Report clearly shows that the rate of delivery in Charnwood is fragile and sites within the authority can be subject to delay in a similar way to many other sites across Leicestershire and the rest of the country. The Local Plan should enable the authority to provide the circumstances under which delivery rates can be maintained.
- 2.12 All site allocations may be subject to delay over the plan period and size of site is not a determining factor as outlined within our representations from August 2021. Strategic allocations and non-strategic allocations can be subject to delay over the rolling five year period or the whole plan period which clearly demonstrates the need for a greater buffer to be included to the overall housing requirement.

- 2.13 Including a greater buffer and in turn additional site allocations which can come forward as standalone sites and not reliant on existing infrastructure which can often be at or nearing capacity. Identifying additional allocations is a positive intervention that can ensure delivery rates across the plan area are maintained which overall contributes to meeting the needs of Leicester and Leicestershire.



Boyer

