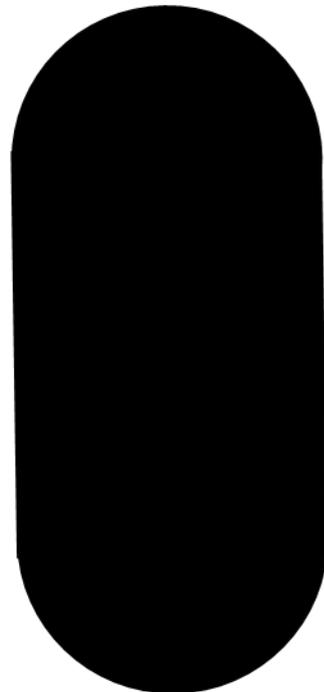
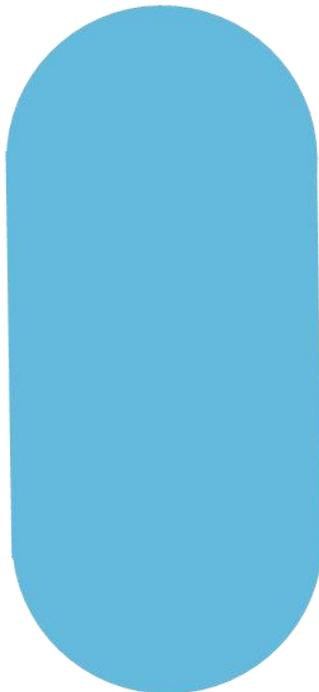
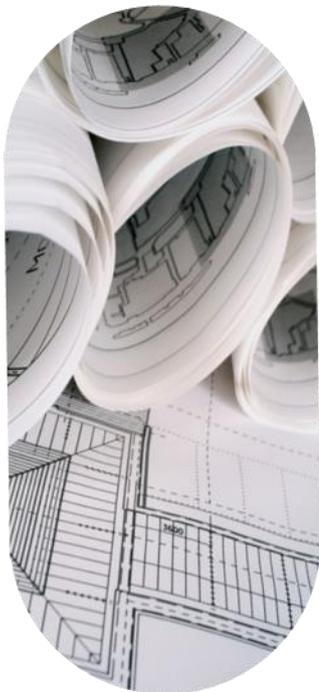


**WRITTEN STATEMENT IN RESPECT OF THE
CHARNWOOD LOCAL PLAN 2021-37
EXAMINATION**

**MATTER 6- URBAN AREA POLICIES, SITE
SELECTION, SUSTAINABLE URBAN
EXTENSIONS AND HOUSING SITE ALLOCATIONS**

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



1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Richborough Estates and the Bowler Family in response to the Inspectors' Matters, Issues and Questions for the examination hearings for the Charnwood Local Plan 2037.
- 1.2 Both Richborough Estates and William Davis have previously made representations to the Regulation 19 Local Plan consultation in respect of Policy DS3, site reference HA15.
- 1.3 Richborough Estates and the Bowler Family, William Davis Homes and the Council have agreed a Statement of Common Ground (SoCG) and we anticipate that the signed SoCG will form part of the Council's pack submitted to the examination (and so provision is not duplicated here).
- 1.4 The Statement of Common Ground (SoCG) confirms agreement between Charnwood Borough Council, Richborough Estates and the Bowler Family and William Davis Homes with respect to the following matters:
- i. The allocation of the Site is appropriate and justified.
 - ii. The extent of the Site, and of the land owned by the Council which will be used to provide an access point to the Site from Allendale Road, are as shown on the plan in section 1 (of the SoCG).
 - iii. Access can be achieved to the Site. The Promoters are continuing to explore connectivity between the land under their control and the remainder of the Site. The Council and the Promoters are committed to the need to ensure a cohesive approach to development of the whole of the Site.
 - iv. The amended trajectory set out in section 2 (of the SoCG) provides a realistic timetable for the development of the Site.
 - v. Should evidence from the Local Education Authority (LEA) continue to show that the Site and other allocations generate proven need, a

new 2 form entry primary school will be located on land within the Site boundary which meets the reasonable requirements of the LEA.

- vi. The land and build costs of the school will be shared equally on a per dwelling basis between the developments that it will serve. Arrangements for the timing and funding of the new primary school will be set out in a separate delivery strategy document.
- vii. The objectives of the requirements in Policy DS3(HA15) in relation to landscape and settlement identity are supported.
- viii. The quantum of development and the illustrative drawing in the Pre-submission Draft Local Plan have been informed by technical exchanges between technical officers from the Council and the Promoters.
- ix. The objectives of the requirements in Policy DS3(HA15) in relation to green infrastructure and biodiversity, and the mechanisms proposed for achieving them, are supported.
- x. The objectives and requirements in Policy DS3(HA15) in relation to securing comprehensive and cohesive development of the Site are supported for the land under the control of the Promoters.
- xi. Policy DS3 should provide clarity regarding how to interpret the quantum of development identified for the allocation.
- xii. The Promoters are committed to working together and with the Council in relation to the promotion and delivery of the Site.

2. MATTER 6- URBAN AREA POLICIES, SITE SELECTION, SUSTAINABLE URBAN EXTENSIONS AND HOUSING SITE ALLOCATIONS

Issue 1 – Whether the Urban Area Policies are justified and will be effective in meeting development needs

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- 2.1 Loughborough is the main urban area and also the main destination for employment in the Borough, with over 18,600 (25% overall) economically active people who live in the Borough, working in the town. The town also has an excellent range of higher order services and facilities available within the settlement and excellent public transport connectivity to the wider area (DS/3 Charnwood Settlement Hierarchy Assessment 2020).
- 2.2 Loughborough is the social and economic focus for the Borough and as a result is identified as the Urban Centre by the Charnwood Settlement Hierarchy. Development at the edge of the Loughborough reinforces the Borough's relationship with the town and the economic and social opportunities it presents.
- 2.3 Policy LUC1: Loughborough Urban Centre draws together policy objectives from across the plan in what appears to be a signposting exercise to provide a spatial framework to support the urban area's role as the central economic, social and cultural focus of the Borough. The Policy recognises the development strategy proposed through Policies DS1 and DS3 and is both justified and forms an effective mechanism to inform proposals for suitable development at this location.

Issue 2 – The site selection process

- 2.4 The site selection process for the proposed housing allocations is soundly based. The Sustainability Assessment (SA) Report (May 2021) notes that the Council used the outcome of the different stages in the sustainability appraisal process alongside other factors to identify the strategy for new homes in the Local Plan. This included consultation with the Local Education Authority and the Clinical Commissioning Groups to understand the capacity of local schools and doctors' surgeries.
- 2.5 The SA Report considered on-site constraints, pressure on existing facilities and wider implications of development in respect of landscape as part of the process. These factors have been appropriately recognised through suitable housing allocations within the Local Plan and a significant number of reasonable alternative sites have been assessed

(see SA Appendix H).

2.6 A detailed assessment in respect of land south of Loughborough (HA15) was undertaken within Richborough Estates and William Davis representations to the Regulation 19 Local Plan consultation (see Marrons Planning Representation dated August 2021 - paragraphs 4.31 – 4.37).

2.7 In respect of site capacity, and not seeking to repeat statements made in our Matter 2 Statement, it is considered that modifications are required to provide clarity that the yield prescribed to housing allocations is a minimum and that the quantum of development on allocated sites should be informed by a constraints-led master-planning exercise at the planning application stage. A comprehensive masterplan is being developed which suggests Richborough Estates and William Davis Land can deliver 715 homes. Taken together with 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).

2.8

[Issue 4 - Housing allocations](#)

2.9 Allocation HA15 is consistent with the development strategy set out in Policy DS1 and will facilitate the delivery of a significant proportion of housing growth at the Loughborough Urban Centre.

2.10 The land south of Loughborough (HA15) is identified within Policy DS3 for accommodating 723 homes. A planning application at the eastern parcel is currently subject to a planning appeal (application reference P/21/0550/2) and progress is being made in respect of applications across the wider allocation.

2.11 Whilst not seeking to repeat commentary covered within our Matter 3 Statement, we do not consider the HA15 indicative diagram to be the appropriate approach for maintaining settlement separation. In our view a

constraints-led masterplanning exercise provides for better understanding of both yield and development area. Assessments to date indicate that the housing allocation can be accommodated without causing significant harm to the landscape.

- 2.12 The site is located in Flood Zone 1 and is at low risk of flooding. Similarly, it is considered that the development would result in no harm to the significance to the nearest designated heritage asset or their setting.
- 2.13 The site is dominated by agricultural uses and as such existing habitats are considered to be of limited ecological value. No protected or notable plant species have been observed and all plant species encountered are common, widespread and characteristic of the common habitat types they represent. In this regard, it is considered that a biodiversity net gain can be delivered as part of proposals.
- 2.14 Further to the requirement for comprehensive development and a cohesive approach through Policy DS3(HA15) the Highways Authority has signalled a requirement for two accesses (likely to be from the roundabout to the north-west, and from Allendale Road, to the south-west of Woodthorpe).
- 2.15 In accordance with agreed point iii of the SoCG the promoters are continuing to explore connectivity between the land under their control and the remainder of the Site. The Council and the Promoters are committed to the need to ensure a cohesive approach to development of the whole of the Site and consider that access can be achieved to the Site. Representations to the recent Parkers application (P/21/0550/2 – now an appeal) by Richborough Estates sought appropriate delivery and phasing arrangements by condition and S.106 to require the appellant to enter into necessary adoption agreements (S.38 and S.104) up to the boundary of the adjacent site with no intervening land between the ownerships to ensure a comprehensive approach and secure both access points to the allocation.
- 2.16 The Borough Council and County Council (as local education authority)
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have been engaging with site promoters and developers across the allocations where education provision is required to provide school place capacity and enable the growth strategy. A new 2 form entry primary school is expected to be located on land within the allocation (see agreed point iii of the SoCG).

2.17 In accordance with agreed point iv of the SoCG we anticipate that the land and build costs of the school will be shared equally on a per dwelling basis between the developments that it will serve through S.106 agreements. Arrangements for the timing and funding of the new primary school will be set out in a separate delivery strategy document.

2.18 However, Richborough Estates, the Bowler Family and William Davis consider Policy DS3(HA15) to require clarification in respect of the final bullet point. Therefore we would suggest that the final bullet points of the first section of the policy be deleted and replaced with the following modified text:

- ***provide a site for a new 2 form entry primary school located on land within the allocated site boundaries and of a size and specification which meets Leicestershire County Council's requirements. We will expect the reasonable land and build costs of making this provision to be shared***

2.19 We note the Inspectors' general question on the Loughborough Urban Centre as well as the specific questions raised in respect of HA15.

2.20 Firstly, the Site Specific Policies for allocations HA16, HA17, HA19, HA20, HA24 and HA29 all note contributions are to be made to the reasonable costs of the provision of the primary school located at site HA15. It is considered that a modification is necessary to these specific policies to read:

contribute to the reasonable land and build costs of the provision of a 2 form entry primary school located at site HA15, as necessary.

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- 2.21 We comment on landscape character and loss of separation between Loughborough and Quorn in our Matter 3 Statement. The requirements in Policy DS3(HA15) in relation to landscape and settlement identity are supported (see agreed point vii of the SoCG) and we agree with the principle set by DS3(HA15) that built development be restricted to the north of the ridge line that runs approximately east to west across the site.
- 2.22 We note that the key diagram shows structural landscaping south of the built form. However, the key diagram is not considered to be justified or effective in demonstrating ‘acceptable’ development at the site (see Matter 3 statement). The requirements for structural landscaping and the land identified within the allocation site boundary are not considered to be clear or flexible and should be determined through a constraints-led masterplanning exercise.
- 2.23 A suitably designed scheme can be delivered that demonstrates an acceptable landscape strategy in respect of both Woodthorpe, Quorn and the wider area and thereby minimise any impact upon Woodthorpe.