



# HEARING STATEMENT: MATTER 6

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Representation No: 542  
Land at Main Street, Cossington

on behalf of  
**Spitfire Homes**

30 May 2022

Client Reference: RCA152o

Last User: JB

# QMS

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# EXECUTIVE SUMMARY

This is a response to the Matters, Issues & Questions, on behalf of Spitfire Homes. The response relates to Matter 6: Urban Area Policies, Site Selection, Sustainable Urban Extensions and Housing Site Allocations.

We do not comment on all Issues and Questions, but only those which are relevant to our client and their site, at Main Street, Cossington.

In this document, we raise some concerns regarding the justification for rejecting sites from the Local Plan and the lack of flexibility provided. This is linked to the contents of our hearing statement in relation to Matter 7.

## 1. ISSUE 2: THE SITE SELECTION PROCESS

**Question 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?**

- 1.1. In between the Draft Local Plan Consultation and the Pre Submission Consultation, Charnwood District Council removed the land at Main Street, Cossington as an emerging allocation. This site has several references, so to be clear, PSH393 is its reference within the Topic Papers, and we will refer to it as such for continuity.
- 1.2. At the time of writing, the site is subject to an application by Spitfire Homes for 57 new homes, open spaces and associated infrastructure (Ref: P/21/1446/2). The scheme has been subject to public consultation and significant negotiation, and it is anticipated it will be taken to planning committee in July 2022.
- 1.3. The justification provided via email for this change was the challenge to meet primary education needs in Cossington. As a result, the email explained, the pre-submission plan makes provision for a “0.5 form entry expansion to Cossington Primary School to support development at Cossington and Sileby”. This is now provided within the proposed residential site (Ref: HA59) on the north-eastern edge of Cossington, which is an emerging allocation for 124 dwellings.
- 1.4. However, as we argue in our Representation to the Pre-Submission Consultation, there is no reason why the site at Main Road, Cossington (PSH393) could not contribute financially towards the expansion to Cossington Primary School. This could be towards the 0.5 form entry expansion, or, if necessary, a full form entry extension. On this subject, the Development Strategy and Site Selection Paper (TP-2) states at paragraph 5.6 that, the identification of enough sites to support a full form entry would involve more compromises which would outweigh the benefits. As we identify in our representation, the suggested compromises are not justified or properly articulated.
- 1.5. Page 39 of TP-2 argues that site PSH393 was removed to reduce the scale of impact at Cossington and because the alternative site provides the opportunity to expand the Primary School. This explanation is lacking, since between the Draft Plan and the Pre Submission plan, the proposed number of dwellings for Cossington did not reduce, since the 54 dwellings earmarked for land at Main Street, Cossington have simply been added to the retained site at Derry’s Nursery, which now sits at 124 homes.
- 1.6. This is brought into sharper focus when consulting the Sustainability Appraisal (SA), which shows that the site scores well across the vast majority of metrics. The only explanation for the rejection of the site is provided at 6.3.16 which focuses on the benefits of the allocation site (PSH260), rather than any shortcomings associated with PSH393, stating that it has “better accessibility scores”. Other than the access to the primary school, which PSH260 scores higher on due to its provision of land for the expansion, the only other accessibility score in which PSH260 scores higher is the proximity to health care. On this metric, PSH260 scores a “minor positive effect”, whilst PSH393 is ranked as having “potential for significant negative effects/major constraint”. Quite how the sites score so differently, given that there is less than half a mile between them, is unclear. The only explanation is that site PSH260 is less than 2km from the nearest GP, whilst the

site at Main Street, Cossington (PSH393) is 2.25km from the nearest GP. This is not a sound reason to reject a site.

- 1.7. Whilst we acknowledge that the alternative site is larger and therefore has the potential to deliver a greater number of homes - as mentioned in the SA - the suggestion is not that the site at Main Street, Cossington (PSH393) should replace the allocation, but be provided in addition to it. This is because it is closer to Cossington primary school than any of the sites in Sileby and scores equivalent and better to those sites too.
- 1.8. Moreover, Appendix C17 (Site Selection Tables) TP-2 shows that the site (Ref: 393) scores very highly (A) across almost every category, including landscape, ecology, flood risk, air quality, distance to GP and Primary School. The site therefore scores higher than the proposed allocation site, but interestingly, equivalent to the allocated sites in Sileby. This is relevant because page 37 of TP-2 explains that the decision taken was to allocate 350 homes between Sileby and Cossington to secure a 0.5 entry to Cossington primary school to “accommodate growth at both villages”.
- 1.9. Earlier within TP-2 at paragraph 4.26, it is explained that Sileby would benefit from an expansion to Cossington Primary School since parts of the village are within a 2-mile safe walking distance of the school. As we have set out in our previous representation, the larger sites within Sileby will therefore have a walk of around 30 minutes to Cossington primary school, which with small children is more likely to take around 40-45 minutes. As such, residents are far more likely to use the car, resulting in unsustainable trips between Sileby and Cossington in the AM peak and adding to significant traffic congestion around the school.
- 1.10. In comparison, the site at Main Street, Cossington could accommodate approximately 57 dwellings in under 10 minutes from the primary school, which is far more realistic and sustainable.
- 1.11. We must make it clear that we do not object to the allocation of the other site in Cossington. But we do question the logic behind rejecting the land at Main Street site, on the basis that sites in Sileby will benefit from and contribute towards the expansion of a school in Cossington, when there exists a perfectly acceptable site, that scores well in the Sustainability Appraisal, within Cossington itself.
- 1.12. In our representation to the Pre Submission Consultation, we summarised the numerous reports which support the live full application. Whilst we do not wish to repeat our previous remarks on this subject, this shows that the site is deliverable and unconstrained.
- 1.13. As such, the reasons for rejecting this site are not clear or adequately justified.

## 2. ISSUE 3 – SUSTAINABLE URBAN EXTENSIONS

**Question 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 of 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?**

- 2.1. It is agreed and acknowledged that the delivery of Sustainable Urban Extensions (SUEs) will have much slower delivery than smaller and medium sized sites, and clearly, this has caused issues for Charnwood District Council in the past. Given that a substantial amount of housing delivery will

be met through SUEs in this Plan, additional flexibility within the plan is required. As such, we consider that the buffer to the housing requirement should be increased. This should include smaller and medium sized sites to provide sites that would be deliverable in the early stages of the plan period, to account for slower delivery on the SUEs.

- 2.2. Alternatively, the Council should consider a list of reserve sites to provide a different way of providing flexibility. This list would ensure the effectiveness of the plan, assisting in delivery if delays were experienced with the SUEs.