



# Charnwood Local Plan Examination Statement

**Matter 6: Housing Land Allocations**

**Thursday 14 July 2022 and Tuesday 19 July 2022**

On behalf of **Barwood Development Securities Ltd**

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# 1 Introduction

## 1.1 Summary of Our Objections to the Draft Submission Plan

- 1.1.1 This Statement has been prepared by Stantec on behalf of Barwood Development Securities Limited ('Barwood Land'). Barwood Land has an interest in the site known as Phase 2 land at Peashill Farm, Ratcliffe Road, Sileby. The site is the subject of an outline planning application for residential development of the site for up to 175 dwellings, as an extension to the Peashill Farm Phase 1 development, construction of which is already well advanced.
- 1.1.2 Our Regulation 19 response to the Plan, submitted in August 2021, found the Plan to be unsound, for reasons which can be summarised briefly as follows:
- Policies DS1 and DS2 do not provide sufficiently for the housing needs of the borough and the Leicester urban area; and
  - The above site should be allocated under Policy DS3 of the Plan in place of or in addition to some of the sites in Sileby/Cossington which are presently proposed as allocations.

## 2 Response to the Inspector's Questions: Matter 6

### 2.1 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?**

**Question 6.8 Is the site selection methodology based on an appropriate set of criteria? Have the criteria changed during the course of the selection process and if so, why?**

- 2.1.1 The latest SA, along with the April 2022 SoCG and HENA, have only just been published and the Examination process should be paused to allow all parties time to review it so that the above questions can be properly addressed.

### 2.2 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?**

**Question 6.12: Will the allocation of sites in Service Centres and Other Settlements have any implications for the timely delivery of the Sustainable Urban Extensions?**

- 2.2.1 We consider that the delivery trajectories shown for the three SUEs are all wholly unrealistic and over ambitious, noting that construction work on these sites has only just commenced and that all three require major transport and/or drainage infrastructure to be provided ahead of any housing completions. Consequently, we submit that the Plan should allocate additional sites, particularly those for up to around 200 dwellings which can deliver housing early in the plan period, such as our client's site at Sibley;

### 2.3 Issue 4 – Housing Allocations

**Question 6.16:**

- a. **Is the proposed scale of housing development justified, having regard to any constraints and the provision of necessary infrastructure?**
- b. **Is the allocation consistent with the development strategy in Policy DS1 and where relevant, does it take account of a made Neighbourhood Plan?**
- c. **What is the likely impact of the proposed development on the following factors:**
  - settlement separation and identity and landscape character;
  - biodiversity, green infrastructure including public rights of way and agricultural land quality;
  - heritage assets;
  - the strategic and local highway network and other infrastructure including health facilities, education and open space;
  - air and water quality, noise pollution, land stability and flood risk.

- d. Are the development requirements clear and deliverable and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development? Are any main modifications necessary for soundness?**
- e. Has any planning permission been granted for residential development and if so, what are the details?**

#### **Land rear of The Maltings, High Street (site HA55)**

- 2.3.1 We do not consider that the Plan demonstrates that this site is suitable, available, viable or deliverable for housing development, as is required by paragraph 68 of the NPPF, for the following reasons:
- It is situated on low lying land adjacent to Sileby Brook and partly within Flood Zones 2/3;
  - There is no apparent evidence that the site owner is willing for the site to be redeveloped, nor that there is any current interest from developers;
  - Planning permission for residential redevelopment of the site was previously granted but this was not implemented and the permission has lapsed, suggesting that residential development of this site is not viable or deliverable; and
  - In the light of all the above, there is no evidence that the site would be viable for residential development, particularly in the light of its estimated capacity being only 13 dwellings.

#### **Land off Kendal Road (site HA56)**

- 2.3.2 We do not consider that the Plan demonstrates that this site is suitable, available, viable or deliverable for housing development, as is required by paragraph 68 of the NPPF, for the following reasons:
- About half of the site is covered by the National Forest Inventory Map and it contains an orchard with ecological and heritage value;
  - The site appears to have no frontage to an adopted highway and there is no evidence that access rights are available from Kendal Road;
  - There is no evidence that the site is owned or being promoted by a developer with an intention to develop it; and
  - In the light of all the above, there is no evidence that the site would be viable for residential development, particularly in the light of its estimated capacity being only 32 dwellings.

#### **36 Charles Street (site HA57)**

- 2.3.3 We do not consider that the Plan demonstrates that this site is suitable, available, viable or deliverable for housing development, as is required by paragraph 68 of the NPPF, for the following reasons:
- It is in active employment use as an industrial unit and there is no evidence that a site for relocation of the current use has been investigated or found. Furthermore, loss of employment is contrary to adopted Charnwood BC planning policy and would have a harmful effect on the local economy in Sileby;
  - There is no apparent evidence that the site owner is willing for the site to be redeveloped, nor that there is any interest from developers;
  - Highway access improvements are required and there is no apparent evidence that these are achievable, nor that they can be undertaken without impinging on third party land;
  - No assessment of site contamination or the extent of remediation required appears to have been made, this being particularly pertinent given the site's industrial use;

- No assessment appears to have been made of whether the building could be converted to residential use or, if conversion is not feasible, the costs or technical specification involved in its demolition;
- Planning permission for residential redevelopment of the site was granted in 2007 (P/07/3202/2) but this was not implemented and the permission has lapsed, suggesting that residential development of this site is not viable or deliverable; and
- In the light of all the above, there is no evidence that the site would be viable for residential development, particularly in the light of its estimated capacity being only 11 dwellings.

### 9 King Street (site HA58)

2.3.4 We do not consider that the Plan demonstrates that this site is suitable, available, viable or deliverable for housing development, as is required by paragraph 68 of the NPPF, for the following reasons:

- It is in active employment use as a garage and there appears to be no evidence that a site for relocation of the current use has been investigated or found. Indeed, the site occupiers have recently signed a 10 year lease;
- Furthermore, loss of employment is contrary to adopted Charnwood BC planning policy and would have a harmful effect on the local economy in Sibleby;
- The site has multiple owners and there appears to be no evidence that the various owners are willing for the site to be redeveloped, nor that there is any interest from developers;
- Highway access improvements are required and there appears to be no evidence that these are achievable, nor that they can be undertaken without impinging on third party land;
- No assessment of site contamination or the extent of remediation required appears to have been made, this being particularly pertinent given the site's use as a garage;
- No assessment appears to have been made of whether the building could be converted to residential use or if not, the costs or technical specification involved in its demolition;
- The site's location near the railway is likely to result in significant noise and potential odour nuisance, suggesting this is not a suitable environment for residential use; and
- In the light of all the above, there is no evidence that the site would be viable for residential development, particularly in the light of its estimated capacity being only 14 dwellings.

### Rear of Derry's Garden Centre, Cossington (site HA59)

2.3.5 We do not consider that the Plan demonstrates that this site is suitable for housing development, as is required by paragraph 68 of the NPPF, because Cossington is a very small settlement with very few services or facilities, making it unsuitable and unsustainable as a location for housing development of this scale.