



Ian Kemp
Programme Officer
PO Box 241
Droitwich
WR9 1DW

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EP ref: 18-555

By email only: idkemp@icloud.com

Dear Mr Kemp

Re: Representations to Charnwood Local Plan Examination

Emery Planning attended the Examination into the Charnwood Local Plan (2021 – 2037) on behalf of Hollins Strategic Land (hereafter referred to as 'HSL') earlier this year. This representation is on the following documents referred to in the Inspectors Letter EXAM71:

- Exam 57 Sustainability Appraisal Addendum December 2022
- Updated Housing Trajectory
 - Exam 56 a Charnwood Additional Housing Supply Update September 2023
 - Exam 58 B Updated Local Plan Housing Trajectory September 2023
 - Exam 58 C Updated Local Plan Housing Trajectory Notes September 2023
 - Exam 58 D Update to Five Year Supply on Adoption
 - Exam 58 E - Five Year Housing Land Supply - April 1, 2023 - Site List

Exam 57 Sustainability Appraisal Addendum December 2022

In our statement to Matter 2 we considered Supplementary Questions 1 and 2. At that stage we considered that Policy DS1 does represent a robust and appropriate approach for the distribution given the level of development required to meet the unmet needs which can be easily accommodated given the range of sustainable settlements across Charnwood, including Queniborough which is of particular interest to HSL.

Exam57 was undertaken to consider two points, the first of which was "*Charnwood's share of unmet housing needs arising from Leicester: Three reasonable alternatives have been identified for the delivery of an additional 78 homes per year, each of which has been appraised*". The three alternatives

- 1. Site intensification – additional development would be achieved primarily by increasing capacity on a range of sites in the Submitted Local Plan.

- 2. Additional sites – higher growth would be achieved by allocation of additional sites in Shepshed, Loughborough and the Leicester Urban Area.
- 3. Cotes standalone settlement – There are continued representations in support of growth at Cotes, which is reflected in this option.

Table 5.1 of Exam57 sets out the “Summary of appraisal findings and ‘relative ranking’”. For ease of reference this is set out below.

Submission Plan	SA Topic	Option 1	Option 2	Option 3
	Landscape	1	? 3	? 2
	Biodiversity	1	3	1
	Water quality	1	1	1
	Flood risk	? 1	? 1	? 1
	Land	1	2	3
	Air quality	1	1	2
	Climate change	1	1	2
	Historic environment	? 1	2	? 3
	Population: Poverty	? 1	? 1	? 1
	Population: Health	2	2	1
	Population: Housing	2	1	3
	Local economy	1	1	1
	Material assets: Access	? 1	? 1	2
	Mineral resources	1	2	3

Interpreting the significance of effects

Significant positive	
Minor positive	
Neutral	
Minor negative	
Significant negative	
Uncertainty	?



Performs better than both other options



Performs poorer than both other options

Paragraph 5.10 to 5.12 of Exam57 summarise each option with 5.10 stating that “*Option 1 appears to be the most sustainable approach when looking at the breadth of sustainability objectives. It is ranked first for four SA*

Objectives, and is not clearly worse than both other options for any SA Objective". Given that overall conclusion, then the preferred route of the LPA to meet Charnwood's share of unmet housing needs arising from Leicester through the intensification of proposed allocations is sound and one we support.

Updated Housing Trajectory

HSL's specific interest is the land north of Melton Road, Queniborough which is proposed for allocation (Site Ref HA65) under Policy DS3. HA65 is one of the sites with an increased capacity to 85 dwellings, although through further work as part of an application ((P22/2310/2) which was submitted in December 2022, we consider the capacity of the site to be 99 dwellings. We recognise that the figures for each site in the Plan are proposed to be indicative and that the wording is to be considered as part of the modifications to the Plan, so we support the inclusion of at least 85 dwellings on this site.

In each of the Exam 56 and 58 documents HA65 is to deliver as follows:

- 2026/27 – 40 dwellings;
- 2027/28 – 40 dwellings
- 2028/29 – 5 dwellings.

Given that the application is pending determination and is in outline then we consider that whilst the site could come forward earlier than 206/27, we consider that the proposed trajectory is appropriate to enable a decision to be made, a reserved matters application to be prepared and approved and for development to commence.

This concludes our representations to these documents.

Yours sincerely
Emery Planning

Stephen Harris BSc (Hons), MRTPI
Managing Director

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