

Mr Ian Kemp  
Programme Officer  
Charnwood Local Plan Examination

By email: idkemp@icloud.com

**Date:** 7 November 2023  
**Our ref:** 12152/01/NT/NB/27171464v1

Dear Mr Kemp

## **Charnwood Local Plan Examination - Response to Consultation on Further Evidence Base Documents on behalf of CEG**

We write on behalf of CEG, the promoters of Thorpebury, the North East of Leicester Sustainable Urban Extension (NEoL SUE). The NEoL SUE is allocated in the adopted Charnwood Local Plan Core Strategy under Policy CS19 and in the emerging Plan under Policy LUA2. As you are aware, we have been actively involved in the examination process to date.

Hybrid planning permissions for the NEoL SUE development were granted by Charnwood Borough Council (CBC) and Leicester City Council (LCiC) in August 2016, reserved matters approvals for Phase 1 have been issued by Charnwood Borough Council and the first homes have now been occupied. CEG wishes to work with both the CBC and LCiC to ensure that their (draft) Local Plans continue to support the timely implementation of development of Thorpebury to help meet housing and employment needs in the Leicester Urban Area, including elements of the City's unmet need which Charnwood Borough Council has agreed to accommodate through its emerging local plan.

Our comments on the latest consultation are presented against the relevant documents, and we have recognised the request to avoid duplication (and for brevity). These comments have been prepared with regard to relevant policy in the National Planning Policy Framework, including the 'soundness' tests at paragraph 35. We ask that they are passed to the Inspectors for consideration.

### **Updated Local Plan Housing Trajectory, September 2023 (EXAM 58B) Additional Housing Supply Technical Note, Updated September 2023 (EXAM 56A)**

Our comments regarding the housing trajectory are limited to emerging allocation HA7 (Land off Barkby Thorpe Lane, Thurmaston) which falls within the boundary of the permitted NEoL SUE.

The latest trajectory (and Table 2 in EXAM 56A) reflects the increased capacity figure (of 180) which was put to the examination following a review by the Council to identify additional housing supply. Previous examination sessions have explored the basis for the Council's uplifts in the capacity figures and we will not revisit these points here.

We do however wish to bring to the Inspectors' attention two outline planning applications which are currently before the Council for determination. Application P/22/2109/2 relates to Land off Barkby Thorpe Lane and seeks permission for up to 130 dwellings. Application P/23/0932/2 relates to Land South of Barkby Lane and seeks permission for up to 79 dwellings. In total, these applications cover the proposed HA7 allocation and, if approved, could allow for the delivery of up to 209 dwellings. We recognise that the total number of dwellings sought exceeds the proposed capacity in the housing trajectory/Table 2, but the detail in these applications, when taken together, reinforces our concern that the quantum of housing proposed in the trajectory cannot be accommodated alongside the supporting infrastructure required for the SUE, in particular the north west link road and outdoor sports provision.

While CEG is willing to work with the applicants and the Council in relation to development on the HA7 land, and noting the brief commentary in EXAM 56A, we are not aware of any evidence to support the higher capacity figure in the latest trajectory. At present, we therefore object to this capacity figure and ask that the Council provides additional evidence to support the latest capacity figure for HA7, or revises this figure downwards to ensure the NEoL SUE infrastructure can be accommodated.

We do not comment on other matters relating to HA7 here, but anticipate that other aspects of that allocation will need to be addressed in response to a future main modification consultation, as other aspects of the relationship between this allocation and the NEoL SUE are currently unresolved.

#### **Draft Transport Strategy (EXAM 75) and Viability Assessment (EXAM 76)**

CEG appreciates the travel demand which can arise from new development, and the need to make appropriate provision to both manage this and encourage sustainable travel choices.

CEG remains concerned that the latest evidence does not adequately address the possible effects of growth, including by recognising the travel demand which has already been accepted and accommodated through the grant of planning permissions for strategic sites such as the NEoL SUE. In particular, it is essential that any future strategy makes adequate provision for additional (housing) developments to contribute towards any associated highway works or transport demand arising in a timely way, to avoid the capacity which is created by investment associated with the strategic sites being taken up by other development. Greater certainty and justification around costs and funding sources is required to ensure the necessary investment can be fully funded by viable developments, and that the strategy/ies ensure the costs are appropriately apportioned to different developments.

We recognise that this consultation does not cover the significant modifications proposed to transport and infrastructure policies in the emerging Plan, and we will comment on these as necessary as part of a future main modifications consultation.

Finally, we should note that Lichfields and CEG may wish to participate in any further examination sessions which are scheduled to discuss these matters.

Yours sincerely



**Lichfields**