

**From:** policy Gladman <policy@gladman.co.uk>  
**Sent:** 29 August 2024 09:24  
**To:** localplans@charnwood.gov.uk  
**Cc:** policy Gladman  
**Subject:** Main modifications - Gladman Developments  
**Attachments:** Charnwood Main Modifications - Gladman 280824.pdf

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Good morning Local Plans Team.

Please see attached, Gladman Developments Ltd representations to the main modification's consultation on the Charnwood Local Plan Review.

I'd be grateful if you could confirm receipt.

Kind regards,

**Andy Collis**  
Senior Planner



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By email only to: [localplans@charnwood.gov.uk](mailto:localplans@charnwood.gov.uk)

Dear Local Plans Team,

### **Re: Schedule of Proposed Main Modifications to the Charnwood Local Plan Review**

These representations provide the response of Gladman Developments Ltd (hereafter referred to as “Gladman”) to the consultation for the Main Modifications to the Charnwood Local Plan Review (CLPR). Gladman has been involved throughout the preparation of the CLPR having submitted detailed representations to each of the previous stages of consultation and having been a participant at the hearing sessions during the Examination in Public.

Whilst welcoming several of the proposed changes, Gladman consider that further modifications are necessary to ensure clarity and that the application of the policies is in accordance with national policy and guidance.

#### **MM24 – Policy DS1 Revised Text (Sub-header: Implementation of Spatial Strategy)**

The changes proposed are broadly supported. That said, given the expectation that a new NPPF will be in force prior to the adoption of this Plan, it may be prudent to consider amending the wording to closer align with the consultation draft of the Framework which reads at paragraph 11(d) “...or the policies for the supply of land ~~which are most important for determining the application~~ are out-of-date.”

#### **MM25 – Policy DS2 and Supporting Text**

The amendments to the supporting text of what was Policy DS2 clarify the Council’s position with regards to unmet need for housing and employment emanating from Leicester City Council and how these will be dealt with through the Plan. Given the position on this matter established through the examination, it is then proposed that Policy DS2 is deleted in its entirety.

The possible need for an early review of the Plan is not exclusive to matters pertaining to unmet housing/employment needs but could also be triggered by the monitoring of the delivery and effectiveness of policies of the Plan against specific performance indicators and targets, or by significant changes to national policy or guidance. As such Gladman do not support the deletion of Policy DS2 insofar as it leaves the Plan without an implementable review policy and consider that for the Plan to be justified and effective, a review policy of some nature must be retained.

Consequently, Policy DS2 should be retained (or another review policy inserted) with the policy wording strengthened to ensure that it defines with clear stages and timing, the areas and process that will trigger a review of the Plan. For example, this could be if an authority within the Leicester and Leicestershire Housing Market Area confirms that they are unable to meet their own objectively assessed needs and/or any unmet need as currently apportioned, or any updated evidence or changes to national policy that suggest that the overall development strategy should be significantly altered. Another aspect could confirm that the identification of substantial and persistent shortfalls in the delivery or supply of housing against the housing requirement would also trigger a review.

### **MM157 & MM158 – Policy INF2**

Together MM157 & MM158 propose a significant redrafting of Policy INF2: Local and Strategic Road Network and its supporting text. These MMs follow hearing sessions on infrastructure and plan viability and submissions by several interested parties in response to questions posed by Inspectors in February 2024

Policy INF2 as modified states that the Council will continue to work with key stakeholders to mitigate the transport impacts of the development strategy through the delivery of Transport Strategies for Loughborough Urban Centre and Shepshed Urban Settlement; Leicester Urban Area; and the Soar Valley. The Transport Strategies are set out within the Draft Charnwood Transport Contributions Strategy (CTCS) released for consultation by Leicestershire City Council (LCC) between 10<sup>th</sup> July 2024 and 23<sup>rd</sup> August 2024.

Gladman understands that the approach proposed by LCC through the CTCS has been subject to considerable scrutiny through that consultation exercises with questions raised, amongst other matters, on the viability evidence underpinning the document, the legality of the approach, and whether the draft CTCS falls into conflict with Policy INF2 as proposed to be modified. The outcome of that consultation, which only concluded on the 23<sup>rd</sup> August, will likely have implications for Policy INF2 and thus Gladman would like to reserve the right to respond to any subsequent queries that the Inspectors may have in connection with INF2 and the CTCS, arising from the main modifications consultation exercise. For the avoidance of doubt, Gladman recognise the challenges that CBC and LCC face and remains committed to working with them to advance the delivery strategy for the proposed infrastructure in a pragmatic and efficient manner; to allow residential development on allocated sites to come forward quickly.

### **Conclusions**

I hope you have found this response to be constructive. Should you require any further information please do not hesitate to contact me.

Yours faithfully,

A solid black rectangular box used to redact the signature of Andrew Collis.

Andrew Collis | Senior Planner  
Gladman Developments Ltd.