

**From:** Hannah Price <Hannah.Price@williamdavis.co.uk>  
**Sent:** 04 September 2024 15:14  
**To:** localplans@charnwood.gov.uk  
**Cc:** Tom Dillarstone  
**Subject:** Consultation on Main Modifications to the Charnwood Local Plan 2021-2037  
**Attachments:** MM27 - William Davis Homes .pdf; MM 35 - William Davis Homes.pdf; DM1 DM15 - William Davis Homes.pdf; MM112 - William Davis Homes.pdf; MM131 - William Davis Homes.pdf; MM140 - William Davis Homes.pdf

You don't often get email from hannah.price@williamdavis.co.uk. [Learn why this is important](#)

Dear Sir/Madam

Please find attached William Davis Homes' representations on the proposed Main Modifications to the Charnwood Local Plan.

These comments cover the following Main Modifications:

- MM27 – Modifications to explanatory text to Policy DS3
- MM35 – Modifications to Policy DS3 (HA12 – Land at Gynsill Lane and Anstey Lane)
- DM1 & DM15 – Modifications to Local Plan Diagram for HA12
- MM112 – Modifications to Policy H6 (Self-build and Custom Housebuilding)
- MM131 – Modifications to Policy CC2 (Sustainable Drainage Systems)
- MM140 – Modifications to Policy CC5 (Sustainable Transport)

Should you have any queries or require any further information from us, please do not hesitate to contact myself or Tom Dillarstone (ccd).

If you can confirm safe receipt of the attachments, that would be much appreciated.

Kind regards

Hannah



Hannah Price  
Senior Planner  
01509 638373  
07795 447457  
Hannah.Price@williamdavis.co.uk



William Davis Limited [www.williamdavis.co.uk](http://www.williamdavis.co.uk)

Head Office: Forest Field, Forest Road, Loughborough, Leics, LE11 3NS, Telephone: 01509 231181

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For responding to:

- **Main Modifications**  
(EXAM 81-83)
- **Housing Land Supply**  
(EXAM 58J – 58M)



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**Charnwood Local**  
**Plan 2021-2037**  
Main Modifications  
Representation Form

Ref:

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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title	Mrs	
First Name	Hannah	
Last Name	Price	
Job Title (where relevant)	Senior Planner	
Organisation (where relevant)	William Davis	
Address Line 1	Head Office: Forest Field	
Line 2	Forest Road	
Line 3	Loughborough	
Line 4		
Post Code	LE11 3NS	
Telephone Number		
E-mail Address (where relevant)	Hannah.Price@williamdavis.co.uk	

## Part B – Please use a separate sheet for each representation

---

Name or Organisation: William Davis

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification Reference

MM35

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

Proposed Modification 35 seeks the addition of further text to the 5<sup>th</sup> bullet point of Policy DS3 HA12 (Land at Gynsill Lane and Anstey Lane). This will require:

*"A masterplan to be agreed with the local planning authority in consultation with Leicester City Council and Blaby District Council which includes access, landscaping, education provision, delivery and phasing arrangements for the wider cross boundary development area, in order to achieve comprehensive development; and"*

We agree with the proposed modification to this policy as it provides further clarity to the previously drafted policy wording.

William Davis Homes have a pending planning application on Site HA12 (Ref: P/23/0659/2) and are actively promoting the western parcel of land in Blaby District to the emerging Blaby Local Plan. We have also been working collaboratively with the promoters of the land to the south in Leicester City (David Wilson Homes) to prepare a Joint Masterplan Phasing Plan (please see attached for information). This Plan has been submitted to the ongoing Leicester City Examination to demonstrate how all parties within the wider cross boundary development area are working together.

The Plan illustrates how the sites will deliver a comprehensive development with appropriate infrastructure including a reserve site for a 1FE primary school, green infrastructure and access arrangements. Details of development phasing is also provided. Liaison to seek Charnwood's agreement to the Masterplan is ongoing as part of the progression of our planning application and consultation with Blaby District and Leicester City Officers is ongoing.

Nevertheless, we wish to highlight that whilst site HA12 is part of the wider development area, the Masterplanning, delivery and phasing of the element in Charnwood should not be hindered as a result of the less progressed emerging local plan stages in adjoining local planning authorities.

(Continue on a separate sheet /expand box if necessary)

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Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

7. Please set out any comments that you have on the updated housing land supply documents:

- EXAM 58J: Housing Trajectory Update 2024
- EXAM 58K: Housing Trajectory Update Notes July 2024
- EXAM 58L: Update to Five Year Supply on Adoption May 2024
- EXAM 58M: Updated Housing Land Supply Site List April 2024

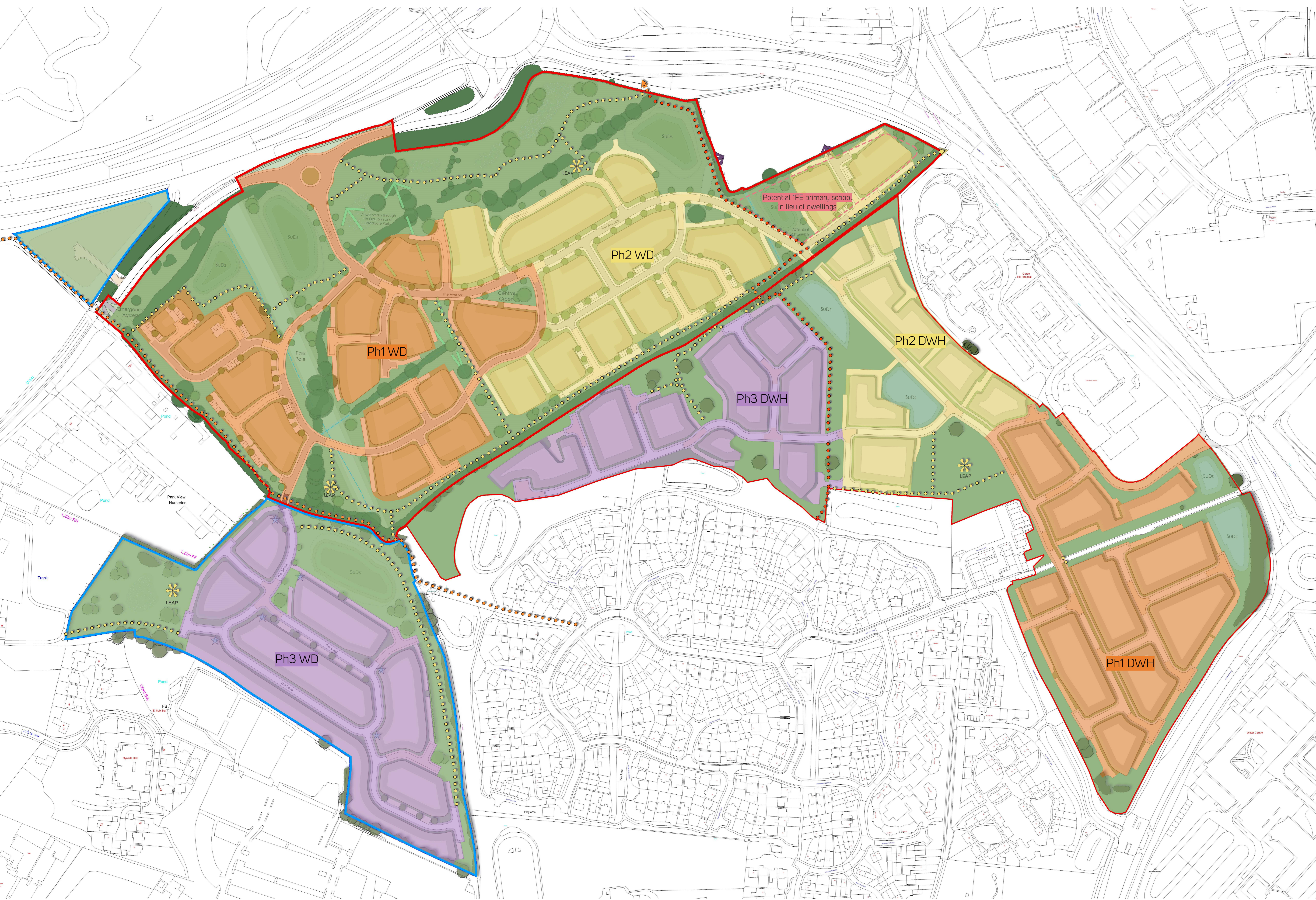
(Continue on a separate sheet /expand box if necessary)

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8. Signature: Hannah Price Date: 03.09.24



- Key
- Phase 1 - 188 Dwellings
  - Phase 2 - 187 Dwellings
  - Potential 1FE primary school in lieu of dwellings
  - Phase 3 - 171 Dwellings
  - David Wilson Homes
  - Phase 1 - 154 Dwellings
  - Phase 2 - 80 Dwellings
  - Phase 3 - 111 Dwellings
  - Open Space Areas
  - Existing Public Right of Way
  - Redirected Public Right of Way
  - Proposed pedestrian/cycle link







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**Plan 2021-2037**  
 Main Modifications  
 Representation Form

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(EXAM 58J – 58M)

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### 2. Agent's Details (if applicable)

Title	Mrs	
First Name	Hannah	
Last Name	Price	
Job Title (where relevant)	Senior Planner	
Organisation (where relevant)	William Davis	
Address Line 1	Head Office: Forest Field	
Line 2	Forest Road	
Line 3	Loughborough	
Line 4		
Post Code	LE11 3NS	
Telephone Number		
E-mail Address (where relevant)	Hannah.Price@williamdavis.co.uk	

# Part B – Please use a separate sheet for each representation

---

Name or Organisation:

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification Reference

DM1 &  
DM15

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

DM1 & DM15 seek updates to the Local Plan Diagram for HA12 (Land at Gynsill Lane and Anstey Lane, Glenfield)

We welcome the proposed modification to the diagram as it provides transparency on the geographical locations of the Blaby and Leicester City parcels which form the wider cross boundary development area.

As outlined by our pending planning application (Ref: P/23/0659/2) vehicular access to the site will be off Gynsill Lane and therefore it is expected that the area shown as Green Wedge on the diagram will not prejudice our ability to access the site.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

7. Please set out any comments that you have on the updated housing land supply documents:

EXAM 58J: Housing Trajectory Update 2024

EXAM 58K: Housing Trajectory Update Notes July 2024

EXAM 58L: Update to Five Year Supply on Adoption May 2024

EXAM 58M: Updated Housing Land Supply Site List April 2024

(Continue on a separate sheet /expand box if necessary)

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8. Signature: Hannah Price

Date: 03.09.24





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### 2. Agent's Details

(if applicable)

Title	Mr	
First Name	Thomas	
Last Name	Dillarstone	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	William Davis	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)	Tom.dillarstone@williamdavis.co.uk	



## Part B – Please use a separate sheet for each representation

---

Name or Organisation:

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification Reference

MM2  
7

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

Proposed Modification MM27 seeks the inclusion of additional 'explanatory' text prior to Housing Allocations Policy DS3. We are mindful that the NPPF requires policies to be unambiguous and clearly written (Para 16d).

The additional text is not policy and yet it expresses a requirement for the design and layout of development on allocated sites to be considered comprehensively with development at nearby sites, especially at certain clusters of adjacent or adjoining sites, as listed in MM27. HA18 (for which William Davis have a pending planning application Ref: P/22/1154/2) and LUC3 (Loughborough Science & Enterprise Park) are listed. The proposed additional text goes on to set out specific requirements in respect of highways and transport and at point iii it requires joint/linked onsite transport infrastructure in cases where sites directly adjoin.

However, we would highlight that linkages are not always necessary in every circumstance. For example, this is not a requirement contained within Policy DS3(HA18) - Land off Snells Nook Lane as amended at MM39. The modification to Policy DS3(HA18) deletes a previous requirement in this policy for HA18 to safeguard an access to the Loughborough Science and Enterprise Park, if required. Now, an additional bullet point will be added to state that the development should have "*regard to and not prejudice the delivery of site LU3 with regards to site-specific highways and transport requirements, and reasonably and appropriately provides for or facilitates such requirements to be delivered in the future, as necessary*".

In the case of HA18 the requirement for a link to LUC3 has been deleted as it was confirmed to not be necessary, during the determination of the pending application. We are concerned that the addition of the text at MM27 adds unnecessary ambiguity, given the mismatch between the requirements in this text and the allocation specific policies under DS3. This has potential to result in inconsistent interpretation by officers and a lack of clarity for applicants.

As a result of the ambiguity that results when MM27 is read together with the site-specific policies, we consider proposed MM27 to be unsound.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be



helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Deletion of MM27 would remove all ambiguity.

(Continue on a separate sheet /expand box if necessary)

7. Please set out any comments that you have on the updated housing land supply documents:

EXAM 58J: Housing Trajectory Update 2024  
EXAM 58K: Housing Trajectory Update Notes July 2024  
EXAM 58L: Update to Five Year Supply on Adoption May 2024  
EXAM 58M: Updated Housing Land Supply Site List April 2024

(Continue on a separate sheet /expand box if necessary)

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8.  
Signature:

T.Dillarstone

Date:

27.08  
.24





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### 2. Agent's Details (if applicable)

Title	Mr	
First Name	Thomas	
Last Name	Dillarstone	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	William Davis	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)	Tom.dillarstone@williamdavis.co.uk	



## Part B – Please use a separate sheet for each representation

---

Name or Organisation:

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification Reference

MM11  
2

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes  
s

No

4.(2) Sound

Yes  
s

No

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William Davis continue to object to the requirement for self/custom build on sites of 250 dwellings or above. The policy wording does not make it sufficiently clear that it only 'seeks' the inclusion and is not a requirement.

There are several practical issues with including such houses with sites related to health and safety, compliance with any site wide construction management plan, accordance with site wide design principles and the likelihood that those seeking self/custom build plots will not want plots on large scale housing estates (as is set out in paragraph 4.45 of the emerging Local Plan). As such, this part of the policy is not effective and therefore unsound.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the change(s) to the modification you consider necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy H6 should be amended as follows to remove reference to serviced plots on sites of 250 dwellings and above:

"We will support proposals for self-build and custom housebuilding in locations considered suitable for housing in accordance with Policies DS1 and C1.



We will encourage the provision of serviced plots for self-build and custom housebuilding as part of an appropriate mix of dwellings on all major developments in locations where there is clear evidence of local demand.

~~We will seek the provision of at least five serviced plots for self-build and custom housebuilding on sites of more than 250 dwellings.~~

~~Where plots have been made available and marketed appropriately for at least for a 12 month marketing period and have not sold, the plots can be used to deliver general market housing."~~

(Continue on a separate sheet /expand box if necessary)

7. Please set out any comments that you have on the updated housing land supply documents:

EXAM 58J: Housing Trajectory Update 2024

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Date:

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## Part B – Please use a separate sheet for each representation

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Name or Organisation:

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification Reference 

MM13 1
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4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant	Ye s	<input type="text"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Ye s	<input type="text"/>	No	<input checked="" type="checkbox"/>

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the modification, please also use this box to set out your comments.

Proposed Modification 131 and associated changes to paragraph 7.22 requires non-major and minor development to incorporate SUDS where there is the potential for cumulative impact. It is noted that the NPPG (Paragraph: 051 Reference ID: 7-051-20220825) identifies that minor development are unlikely to raise significant flood risk issues unless inter alia the cumulative impact would have a significant effect on local flood storage capacity or flood flows.

However, there is no clarity in the emerging Local Plan on how the potential for cumulative impact will be established or how mitigation could be incorporated across multiple sites which individually may not give rise to an impact and may not be able to provide them on site. Neither the NPPG (ibid.) or the NPPF (paragraph 167 and 175) identify any requirement or expectation that non-major and minor developments should incorporate SUDS. Alternative measures of addressing local storage capacity issues or flood flows may be more appropriate.

There is an inconsistency in wording between CC1, which merely encourages the inclusion of SUDS on non-major and minor developments, and CC2 which expects the inclusion of SUDS. This should be addressed to ensure that decision makers know how to respond.

(Continue on a separate sheet /expand box if necessary)

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Policy CC2 should be reworded to only encourage the inclusion of SuDs on non-major and minor developments where there is evidence that it is necessary and directly related to the development.

(Continue on a separate sheet /expand box if necessary)

7. Please set out any comments that you have on the updated housing land supply documents:

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Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	William Davis	
Address Line 1		
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Post Code		
Telephone Number		
E-mail Address (where relevant)	Tom.dillarstone@williamdavis.co.uk	

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---

Name or Organisation:

3. To which modification to the Local Plan or to the Local Plan diagrams does this representation relate?

Modification Reference

MM1  
40

4. Do you consider the modification is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

5. Please give details of why you consider the modification is not legally compliant or is unsound. Please be as precise as possible.

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Proposed Modification 140 removes "where possible" from 4<sup>th</sup> bullet regarding securing new and enhanced bus services where more than a 400m walk from an existing bus stop. As drafted the policy would appear to require development of any size or type to secure enhancements to bus services if it is more than 400m away from an existing stop. While the aim of ensuring a good access to bus services is supported not every development will be able to justify a new bus stop and/or a diversion of bus service

(Continue on a separate sheet /expand box if necessary)

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Policy CC5 should be reworded as follows "secures, where justified, new and enhanced bus services..."



(Continue on a separate sheet /expand box if necessary)

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T.Dillarstone

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