Charnwood Borough Council

Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation

Methodology and Assessment Findings Report Addendum

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 268195-00

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1 Introduction

1.1 Background

In 2016 Arup was appointed by Charnwood Borough Council to undertake a review of Green Wedges (GW), Areas of Local Separation (AoLS) and Urban Fringe Green Infrastructure Enhancement Zones (GIEZ) as part of the evidence base to support the emerging Site Allocations and Policies Development Plan Document.

The resulting report, 'Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Methodology and Assessment Findings Report' was published in March 2016.

The Green Wedges and Areas of Local Separation Report reviewed the performance of Charnwood's 2 Green Wedges and 13 AoLS against their purposes in policy as set out in the Core Strategy, and reviewed the logic, strength and durability of their boundaries. It considered the potential for the designation of a new Green Wedge around the NE of Leicester SUE in line with the Core Strategy, and the designation of new AoLS's in four areas. It also identified 5 broad areas for potential designation as Urban Green Infrastructure Enhancement Zones (GIEZ's).

The assessment of purposes found that, broadly, the AoLS continue to perform an important role in maintaining the settlement pattern in Charnwood and preventing the merging of settlements. It was noted through the assessment that there had been substantial changes to the patterns of development across the Borough since these areas were first designated. Furthermore, the Borough continues to come under pressure from new developments, risking the compromise of strategic gaps between settlements.

A small number of Zones of Weakness were identified, which were judged not to perform the strategic role of AoLS, whilst conversely a series of Extension Opportunity Areas were found which, if incorporated into the AoLS designations, would ensure the robustness and integrity of the gaps between settlements. Three of the four Proposed Area of Local Separation (PALS) were judged to meet the strategic role and recommended for partial designation.

Similarly, the two Green Wedges broadly meet the four functions and were noted as maintaining the network of gaps between settlements, guiding development form and, providing a 'green lung' through dense corridors of valuable, publicly accessible green infrastructure. Subject to the minor suggested amendments, these areas will continue to play these functions throughout the next plan period and beyond.

1.2 Purpose of the addendum

The new Local Plan will include strategic and detailed policies and will be prepared to provide for a longer plan period than the Core Strategy. As part of the

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plan preparation process the Council published a discussion paper, 'Towards a Local Plan for Charnwood' that explored the scale of development needed in the Borough, the key issues and opportunities that need to be taken into account and considered the options for an overall strategy for delivering the growth needed. At the same time, the opportunity was taken to consult on the evidence base that helped inform the discussion paper. This included the 'Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Methodology and Assessment Findings Report'.

Consultation on the Local Plan discussion paper and supporting evidence started on 26th April 2018 for six weeks and ended on the 7th June 2018. A letter was sent to the 1,338 organisations and individuals that are on the Local Plan consultation database which includes statutory consultees, Parish Councils, planning agents, members of the public and local groups.

This addendum report has been commissioned by Charnwood Borough Council to review and to respond to the representations received in response to consultation on the Green Wedges and Areas of Local Separation Report with the aim of assisting their consideration of making or amending designations in the emerging Local Plan.

This review has comprised the following methodology;

- A desk-based review of the representations received against the findings of the original study and the Charnwood Borough Council Local Plan;
- Review of any changes in legislation in relation to it and recent Inspectors/ Examination findings;
- Review of previous 'Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Methodology and Assessment Findings Report' 2016;
- Site visit to review locations put forward for designation to the south west of Loughborough and revisit previously assessed areas in light of representations received.

2 Responses to Representations

Table 1 below summarises the representations received and provides a response and recommendations for action taking into consideration the methodology outlined above. It will be for Charnwood Borough Council to consider the representations and our responses together with a range of considerations in the 'planning balance' to determine whether to amend or make new designations.

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Table 3.1 Responses to received representations

Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
GW-1	TLP/79 Anstey Parish Council (APC)	APC strongly supports the retention of the GW although the exact boundary should be double-checked.	The alignments of the boundaries have been reviewed in relation to the CBC SHLAA_GW_ALS Map and the findings of the original study in 2016. Minor drafting errors have been noted and amendments proposed so boundaries align to the correct feature to ensure that a more robust edge to the designation is provided (primarily roads and property boundaries) as outlined below. Where the boundary crossed the Latimer Primary School Grounds minor amendments have also been proposed to omit the grounds from the GW. An alternative approach would be to include the entire school grounds within the boundary.	CBC to undertake minor amendments to the boundary to ensure it aligns with OS Base Map. Refer to SHLAA_GW_ALS-Arup Comments.pdf in Appendix A for a full-sized version of the suggested changes and associated comments.
			PSI 13 88 PSI 13 88	

Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
			 Align with property boundary and bridleway/field boundary; Align with property boundary and road; Remove School Grounds from GW; Align to road; Align to property boundary; Align to road; Align to road; Align to road; Align to road; Align to road. 	
ALS-J	TLP/85 Marrons obo Hallam Land Management	Land interests at Melton Road, Queniborough (SHLAA reference PSH42). A Landscape and Visual Appraisal has been prepared as part of the current outline planning application. This concludes there is already a strong sense of visual and physical separation between Queniborough & East Goscote due to the largely continuous mature vegetation along Queniborough Brook and the tree lined road corridor of the embanked A607. The masterplanning approach adopted would accord with Policy CS11 of the Local Plan as it would "maintain the separation between the built-up areas of these settlements" and the "narrow gap" to the northeast would not be reduced. The proposed development does not extend further north of New Zealand Lane or further east than Queniborough's	ALS-J provides a critical gap between Queniborough, East Goscote and Syston. The proposed boundaries of the A607 to the north and Melton Road to the south for the northern area of the ALS provide strong physical and landscape elements along which to define the edge of the designation as proposed in the original study. Whilst trees and vegetation can add to the sense of containment, they cannot always be relied on as a strong and durable boundary due to seasonal variation (leaf coverage). Therefore, the boundary is deemed to be correct at the time of assessment.	The conclusions of the original 2016 report are valid for the circumstances at the time the report was written.

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		eastern most built edge. Proposed tree planting around the northern and eastern boundaries would reinforce existing containment and separation. No reduction of the gap between Syston and Queniborough is proposed. In conclusion the site could be removed from the ALS without impacting upon its overall function and purpose.		
ALS-J	TLP/106 Pegasus on behalf of David Wilson Homes	The 2016 Review identifies land to the west of Barkby Road, Queniborough as part of ALS-J between Queniborough and Syston. The assessment does not provide a sufficiently fine-grained assessment of land making up this ALS. With the Davidsons Homes development to the east, land to the west of Barkby Road is now edged by development on two sides and relates closely to the existing built form of the settlement. Development on the land would not threaten the separate identities of Queniborough and Syston.	ALS-J provides a critical gap between Queniborough, East Goscote and Syston. At the time of the assessment, the housing development to the east of Barkby Road had yet to be constructed and the southernmost built edge of Queniborough provided a durable and the most suitable boundary for the AoLS between Syston and Queniborough. The defined boundary was therefore appropriate.	The conclusions of the original 2016 report are valid for the circumstances at the time the report was written.
		A supporting landscape assessment was submitted as part of the recent planning application demonstrating how development could be accommodated without unacceptable landscape impacts and without threatening the separate identities of the settlements. The assessment should be revisited on the basis of this evidence and the land to		

Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
		the west of Barkby Road removed from the designation.		
PALS-1	TLP/99 IRM Planning on behalf of William Davis and Parker Strategic Land.	The 2016 Study considered the area between Loughborough & Quorn and concluded its contribution was 'WEAK', with the following comments; • gaps between Loughborough and Quorn & Quorn and Woodthorpe less critical due to area's extensive scale and lack of intervisibility between settlements; • central part of gap between Quorn & Loughborough/Woodhouse (around the A6/A6004) more at risk of compromise; • northern and south-western parts of PALS-1, have limited visual and functional connectivity within the surrounding settlements and greater linkage with the wider countryside; and • although these areas form part of the physical gap between Loughborough and Quorn, they play a lesser role in preventing coalescence. The Study explains that the Zones of Weakness make a lesser contribution to maintaining separation between settlements and that: "the proposed scale of PALS-1 was narrowed through the assessment process to focus on a particular corridor where the gap between Loughborough and Quorn	The proposed "small hedge-lined track towards main street" boundary relates to a Public Right of Way (PRoW) that runs from Woodthorpe to Quorn (Footpath ID K35 Woodthorpe to Craddock Drive, Quorn)¹. It is the PRoW that is proposed as the boundary and not the 'small hedge'. At the time of assessment this was deemed as an appropriate boundary for the designation and could remain so. However, as noted in the original assessment, the Great Central Railway (GCR) and A6004 form alternative strong and durable boundaries. Should development be permitted up to these alternatives the remaining gap would be of a sufficient scale to ensure a sense of separation is still provided. The existing vegetation along the A6004, GCR, and the playing fields along Woodhouse Road and Woodhouse Road itself limit intervisibility between Loughborough and Quorn. In view of the above, the designation boundary could be amended without impacting on the purposes of the AoLS. All GWs and ALS were drawn schematically in the diagram in Appendix B of the Local Plan Consultation Document — Towards a Local Plan for Charnwood to provide an overview of the approach. The boundaries proposed in the Arup Study have been incorporated into any relevant data sets and proposals maps developed by CBC. It is this information that should be used for an accurate representation and not the diagram of the consultation document. Whilst it is not necessary for AoLS to be contiguous, a physical linkage can sometimes occur depending on the surrounding factors. This was the case for the ALS-A and PALS-1 at the time of assessment.	CBC to review findings and determine whether an amendment to the boundary in line with the representation is justified.

 $^{{\}it 1} Charnwood\ Interactive\ Mapping,\ \underline{https://webmap.charnwood.gov.uk/CharnwoodWebMap/},\ Charnwood\ Borough\ Council\ (2019)}$

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Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
		would be more sensitive to compromise".		
		These findings are shown in Appendix 1, Drawing 5.1a		
		('Assessment Findings'). The recommended area for the PALS is shown on Drawing 5.1a ('Recommended Designation').		
		In contrast, Appendix B of the Consultation Document proposes that an extensive tract of land between Loughborough and Quorn is designated as an ALS.		
		The methodology relating to ALS's recommends identifying durable, clearly identifiable physical boundaries.		
		Accordingly, the Area of weakness for PALS-1 should be extended north to the A6004. The A6004 and Great Central Railway (GCR) provide a more 'durable' boundary for the southern and western extents of the area of separation. Page 78 of the study notes that the current boundary has been aligned with "a small hedge – lined track towards main street." This 'small hedge' boundary does not in comparison provide a		
		'durable' boundary. The gap between Quorn and Loughborough is a min 1000m wide. To west of Quorn, the playing fields mark a clear settlement boundary. The boundary of the playing fields and Woodhouse Road includes a strong belt of trees,		

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Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
		limiting inter-visibility towards Loughborough. Planting along Woodhouse Road and a low ridge running south west to north east limits views towards the edge of Loughborough. Planting along the GCR, provides further screening. The GCR provides a strong physical feature providing separation between the two settlements.		
		There are few places where the public experience the sense of separation. These include PROW's 17/2 and 35/2 between Loughborough and Quorn and to a lesser extent from A6004 to the north. Views from the A6004 are largely screened by roadside vegetation however a few locations e.g. rail overbridge, afford more open views.		
		Development to the south of Loughborough could extend up to the edge of the GCR whilst maintaining a strong sense of separation between Loughborough and Quorn. Whilst development would narrow the physical gap to circa 600m a sense of separation would remain. Walkers using 2 PRoWs and motorists and walkers along the A6004 will continue to experience a		
		sense of separation. Additional woodland and screen planting implemented as part of the development would add further screening vegetation		

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Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
		Finally, it is not necessary for the existing AoLS to the north of Woodthorpe to be contiguous with a new Proposed Area of Local Separation.		
PALS-3	TLP/62 Persimmons on behalf of Charles Church	Comments focussed on PALS-3 that proposes an Area of Local Separation (AoLS) between Birstall and Rothley. An AoLS does not form part of the NPPF and is purely a planning designation at a local level. The adopted Core Strategy briefly mentions AoLS in Policy CS11, stating that: "We will protect the predominantly open and undeveloped character of Areas of Local Separation unless new development clearly maintains the separation between the built-up areas of these settlements." This is not restrictive in nature and we believe any future AoLS designations should reflect this. As such, PALS-3 should be reduced in order to accommodate potential future development (PSH400 site in SHELAA 2017) in Rothley up to 2036 – see Appendix 1 – Proposed amendment to PALS-3 designation.	PALS-3 provides a critical gap between Rothley and Thurcaston and the Direction of Growth for North Birstall. The proposed boundaries of the Great Central Railway to the east, built development and Rothley Brook to the north, the settlement edges of Rothley to the northeast, the new residential development to the east and the dense woodland that crosses the southern portion of the site provide strong landscape elements along which to define the edge of the designation as proposed in the original study. Therefore, these are deemed to be correct at the time of assessment.	CBC to review findings and determine whether an amendment to the boundary in line with the representation is justified.

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		The reasoning supporting the amendment is as follows:		
		1.The 2016 Review acknowledges that the northern area of the AoLS rurality diminishes northwards. The removed area (PSH400) proposed adjoins the zone of weakness to the north (built form of Hallfields Lane) which the Review concludes should be excluded from the AoLS – the addition of the removed area would not change the overall principles of PALS-3. Furthermore, the proposed area itself is bounded by plantation; creating a sense of enclosure. 2. The proposed area for removal is minimal when considered against PALS-3 as a whole, which the Review itself acknowledges as being "fairly large scale" that provides a large physical gap		
		between Rothley and Birstall. 3. The views from the PALS-3 would not be affected by the removal of the land as per Appendix 1, due to the fact that the Review finds that no more than one key settlement is in view from the centre of PALS-3 – as well as no key views from neighbouring land. Furthermore, it is acknowledged that as there are limited restricted views from neighbouring settlements, there is room for the PALS-3 to be reduced without affecting the efficacy of the AoLS.		

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Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
South West Loughborough	TLP/24-25 NWRG	1. We need an area of local separation bounded as follows Nanpantan Road, Loughborough; The Outwoods; Woodhouse Lane, Loughborough; Bramcote Road; Woodhouse village. This area approximately equates to the areas covered by PSH 172, PSH 284, and PSH106. The area of local separation would be consistent with the views of HM Planning Inspector at the inquiry. Ref: APP/X2410/W/15/3028159 Land south of Nanpantan Road, Loughborough, Leicestershire. He said, "I find that the loss of BMV agricultural land here is a consideration that would be at odds with the aims of relevant national and local policy, and falls on the negative side of the planning and I find that the proposed development would harm the character and appearance of the area and would conflict with relevant development plan policies. This harm and policy conflict weighs heavily against the proposal." 2. We need an area of local separation equating to area PSH 133 - Land off Snells Nook Lane This would prevent [more] development adjacent to the ancient Burleigh Wood and would provide a barrier between residential homes and the proposed Science and Enterprise Park.	The areas in question were not selected for assessment in the original 2016 study as they do not fulfil the criteria used to define the purposes of an AoLS specifically: • Does the area physically separate settlements? • To what extent is the separation at risk of being compromised? The gaps in question are of a sufficient scale that there is negligible risk of settlement coalescence and the separation was not compromised at the time of assessment.	It is recommended that no Area of Local Separation or Green Wedge is identified bounded by Nanpantan Road, Loughborough; The Outwoods; Woodhouse Lane, Loughborough; Bramcote Road; Woodhouse village

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Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
		3.We need an area of local separation at the end of Leconfield Road. This area would prevent [more] development adjacent to the ancient Burleigh Wood.		
South West Loughborough	TLP/64 W D Coates	Areas of separation – Loughborough/Woodthorpe – but add: Loughborough/Woodhouse Loughborough/Woodhouse Eaves Loughborough/Outwoods	The areas in question were not included for assessment in the original study of 2016 as they do not fulfil the criteria used to define the purposes of an AoLS specifically: • Does the area physically separate settlements? • To what extent is the separation at risk of being compromised? The gaps in question are of a sufficient scale that there is negligible risk of settlement coalescence and the separation was not compromised at the time of assessment.	It is recommended that no Area of Local Separation or Green Wedge is identified bounded by Nanpantan Road, Loughborough; The Outwoods; Woodhouse Lane, Loughborough; Bramcote Road; Woodhouse village
South Loughborough	TLP/121 Haddon Way Residents Association	Area South of Woodthorpe and Grange Park Estate: We notice that the following plots [may be earmarked] for future development: • PSH255: Land at Woodthorpe, East and West of A6004 Epinal Way [681] • PSH248: Land South of Woodthorpe and off the A6004, South of Loughborough [394] We believe there should be an area of	The areas in question were not included for assessment in the original study of 2016 as they do not fulfil the criteria used to define the purposes of either a Green Wedge: • To prevent the merging of settlements; • To guide development form; • To provide a 'green lung' into urban areas; and • To provide a recreational resource. Or an AoLS: • Does the area physically separate settlements? • To what extent is the separation at risk of being	It is recommended that no Area of Local Separation or Green Wedge is identified bounded by Nanpantan Road, Loughborough; The Outwoods; Woodhouse Lane, Loughborough; Bramcote Road; Woodhouse village
		Central Railway and any future	compromised? The gaps in question are of a sufficient scale that the area plays no role in preventing coalescence nor was their separation at risk at the time of assessment. They also do not penetrate into existing or planned areas of built form to be considered as providing a 'green lung'. The areas are on the outskirts of	

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Area		the railway attracts many train spotters and creates noise. We are concerned how the developers [and residents] would access these proposed sites [in relation to the Great Central Railway] - safety and security of all should be high on the list of importance. Area to the West of Loughborough and	Loughborough and currently would not guide development form.	
		the Grange Park Estate: We are aware that there is a proposed 3000 major home development between the edge of Loughborough and the Outwoods. As detailed in the following plots: • PSH172: - which looks to be classified now as PSH106		
		PSH284PSH106PSH25PSH21		
		We would urge the council to consider an area of green wedge, if not an area of green separation at the very least from the Outwoods to the rest of Loughborough. Whilst we note that currently this area does not form part of a plan for major growth in the near future, it is		

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Assessment Area	Respondent Identity	Representation Summary	Arup Response	Recommended Action
		highlighted as an area for substantial growth, should the need arise in the future.		
		Bloor homes have previously tried to develop 100 dwellings on the area PSH21: Extend Park Grange Farm. which was rejected. Bloor resubmitted and subsequently withdrew a further applicationPublic opinion was quite strong on this application. Residents wanted to protect features of the area for the future and were concerned about the sustainability of the site.		
		By seeing this site in isolation, we have been concerned as to how it could fit in not only with our existing estate, but also this proposed 3000 area of substantial growth.		
		We would like the council to consider all the areas together as a whole rather than as separate plots.		
		We are happy to discuss with the council our experience of our "new" estate and to work with the council to ensure future development of Charnwood especially round the south of Loughborough is fitting for the surrounding existing development.		

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3 Summary

3.1 Findings

The review of the received representations in relation to the 2016 Study has concluded that the proposed designation boundaries are deemed to have been appropriate at the time of assessment.

The areas to the west and south of Loughborough do not meet the purposes of either a Green Wedge or Area of Local Separation. Alternative designations may be appropriate for these areas which may be informed by the Council's landscape evidence, but this is outside the scope of this report.

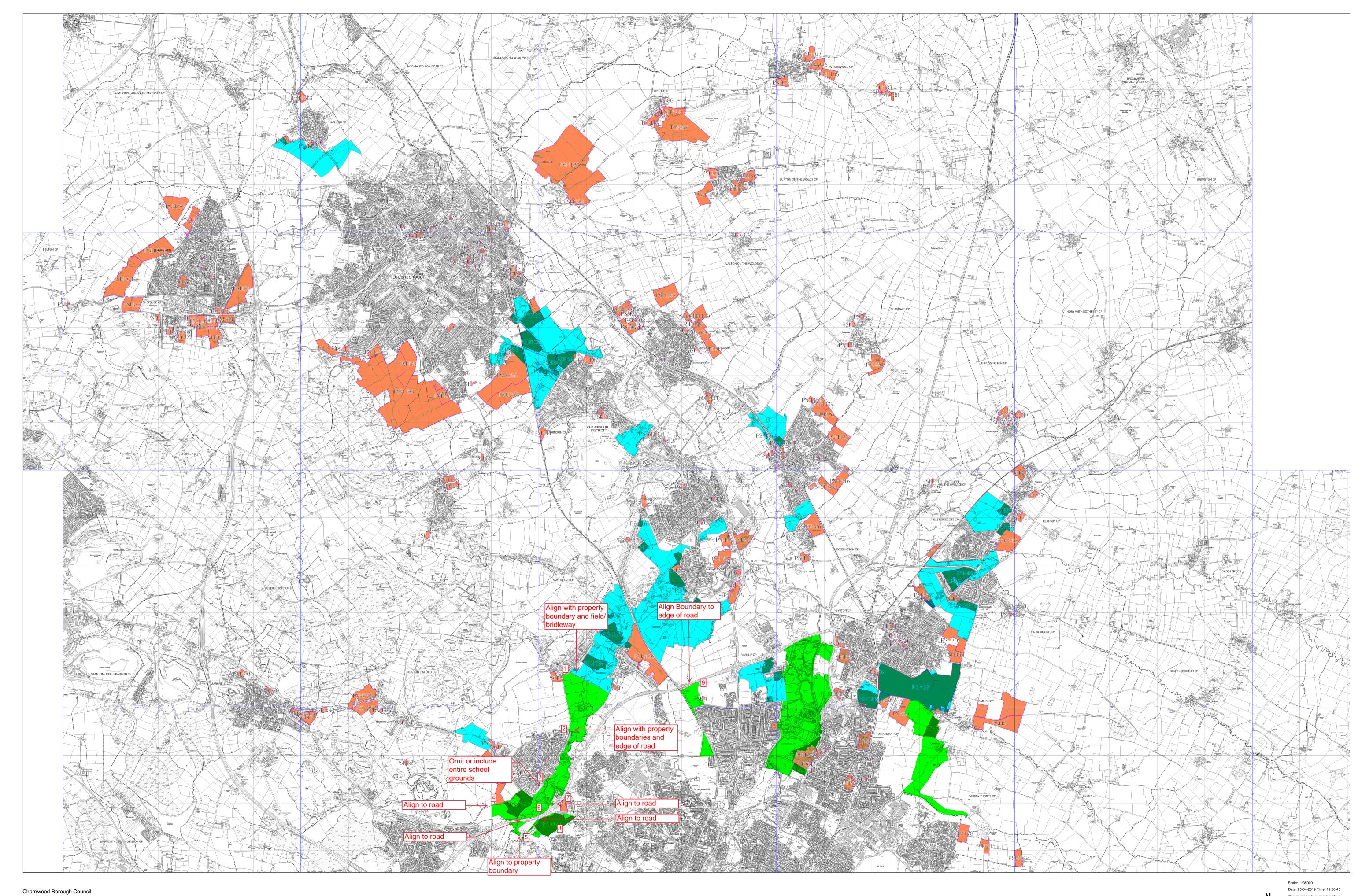
Minor amendments to the GW1 boundary are also proposed to rectify small drafting errors as noted in Appendix A.

3.2 Observations

Whilst undertaking the review it was noted that the Arup OS base map used for the 2016 study includes part of the now completed residential development off Hallfields Lane, Rothley. The current base used for the CBC Local Plan depicts Brookfield Farm in this location suggesting that the base used by CBC may be out of date.

Appendix A

Arup Comments on SHLAA_GW_ALS Map and GW-1 boundary



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