

CORE STRATEGY

**SUMMARY OF COMMENTS RELATING TO: SECTION 5 - DELIVERING SUSTAINABLE DEVELOPMENT - DRAFT CORE POLICIES 4 TO 20**

QUESTION 19: If you have any comments on policies 4 to 20. Set out what changes or alternatives you would suggest.

Draft Core Policy 4 – Housing and Employment Land Supply and Phasing

| Respondents  | Summary of Comments   |
|--|---|
| RN14<br>D Liggins  | <ul style="list-style-type: none"> <li>• Ensure use of brownfield land is maximised.</li> <li>• Allow more conversions to residential especially of historic buildings</li> </ul>   |
| RN23<br>A Rumsey   | Too many immigrants using our resources.  |
| RN339<br>CPRE (Charnwood)                                      | Welcome the fine control on the management of land and recommend regular adjustment so this remains.  |
| RN456<br>Leicestershire County Council                         | <p>The principle of phasing the Greenfield development is consistent with the approach in the Structure Plan and is supported. It is noted that the amount of new development that may be required on greenfield land in north Charnwood between 2011 and 2016 exceeds that envisaged in the Structure Plan, but it is recognised that this arises from the increased rate of development anticipated to be required by the Regional Plan.</p> <p>The phasing of employment land is broadly in line with the Structure Plan and is supported.</p>   |
| RN471<br>R Guise   | Impossible to have a 'better quality of life for everyone' when planning for more houses, more roads etc. Development is not sustainable. Stop it.  |
| RN517<br>Loughborough University<br><br>Agent: GVA Grimley LLP | The Science Park DPD explains that it would be inappropriate to phase the release of the land allocated for Science Park development. This policy proposes phasing, with the release of up to 30 ha of land for Science Park facilities in the period to 2011, and an additional 20 ha in the period to 2016. The University considers that there should be no reference to the phased release of Science Park land in the Core Strategy.   |
| RN520<br>House Builders Federation                             | <p>Wrong to hold back Greenfield sites unnecessarily. Although national planning policy advocates priority to brownfield sites both brownfield and Greenfield sites need to be brought forward together in significant numbers if the overall housing requirement is to be met.</p> <p>Sequential approach must be tied into the annual monitoring process and achievement of housing targets but should be a consideration that allows sites to be taken out of sequence if overall housing targets are not being met from sites higher up the hierarchy.</p> <p>Phasing cannot be used a simple tap to turn housing supply on and off. Large sites often have very long lead up times prior to development occurring and their whole development can take many years.</p> <p>Great uncertainty about timing of delivery of new housing in the district, particularly given the likely substantially higher overall housing requirement. Windfall and urban capacity numbers must be realistic. Should not be an over-reliance on significant housing delivery occurring at tail end of the Plan period as this increases the risk of failing to meet the overall housing requirement.</p> |

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|---|---|--|
| RN521<br>Parkers of Leicester & AJ Parker<br><br>Agent: Development Land & Planning Consultants Ltd | Disagree strongly with phasing of the Strategy. Emerging Regional Spatial Strategy requirements and Charnwood's Corporate Objectives require early land release so that in the long term an adequate, balanced and sustainable supply of land comes forward to sustain development. This will favour, in addition to the proposed western extension, confirmation of, and if required, early release of the southern urban extension for a mix of land uses, ie: employment, housing, community and recreation.   |  |
| RN546<br>Rutherford Properties<br><br>Agent: Fisher German  | Concerned no allowance is made for housing development for the period 2005-2011. Need flexibility to allow for market changes and external factors: <ul style="list-style-type: none"> <li>• Permitted developments may not come forward within the next 5 years;</li> <li>• Lead in times for new developments – legal agreements, negotiation and consultation take time;</li> <li>• Sites released until 2011 may take an additional 3-4 years to come forward for development and so jeopardising the 5 year supply.</li> </ul> Make some allowance for the release of housing in the period 2005-2011. |  |
| RN547<br>C Wells<br><br>Agent: Fisher German  | Concerned no allowance is made for housing development for the period 2005-2011. Need flexibility to allow for market changes and external factors: <ul style="list-style-type: none"> <li>• Permitted developments may not come forward within the next 5 years;</li> <li>• Lead in times for new developments – legal agreements, negotiation and consultation take time;</li> <li>• Sites released until 2011 may take an additional 3-4 years to come forward for development and so jeopardising the 5 year supply.</li> </ul> Make some allowance for the release of housing in the period 2005-2011. |  |
| RN548<br>Mr Johar<br><br>Agent: Fisher German   | Concerned no allowance is made for housing development for the period 2005-2011. Need flexibility to allow for market changes and external factors: <ul style="list-style-type: none"> <li>• Permitted developments may not come forward within the next 5 years;</li> <li>• Lead in times for new developments – legal agreements, negotiation and consultation take time;</li> <li>• Sites released until 2011 may take an additional 3-4 years to come forward for development and so jeopardising the 5 year supply.</li> </ul> Make some allowance for the release of housing in the period 2005-2011. |  |
| RN619<br>Anstey Parish Council  | Support.  |  |
| RN720<br>J Sutherland   | Support.  |  |
| RN740<br>Signet Planning on behalf of William Davis Ltd   | <ul style="list-style-type: none"> <li>• Delete policy to phase employment land releases. Better to allow a continuous and readily available supply of employment land in accordance with PPG4 and RSS8, documents containing no proposals for phasing. The managed release of housing land, assuming employment land is allocated at the same time, should provide its own regulation of land release. The market</li> </ul>   |  |

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|  | should be the key determinant in land coming forward.  |  |
| RN741<br>GVA Grimley on behalf of Jelson Ltd   | Delete DCP4. Seems to only allow for Greenfield location west of Loughborough with no analysis of urban capacity after 2011. There should be sufficient control over housing land release using annual requirements in CS and PPS3 guidance.   |  |
| RN742<br>Redrow Homes  | <p>DCP4: Acknowledge need to release Greenfield after brownfield and commitments but as figures likely to be higher suggest:</p> <ul style="list-style-type: none"> <li>• some development pre 2011</li> <li>• at least 500 dwellings between 2011-2016</li> <li>• any additional provision after 2016</li> </ul>  |  |
| RN803<br>Antony Aspbury Associates on behalf of G I Sanders, G L Sanders, T D Sanders & D Kettle | The Objectors reserve their position in relation DCP 4 prior to the publication of revised strategic guidance on housing and employment land in the East Midlands.   |  |
| RN806<br>A Kay   | Delay release of employment land on Science Park due to extremely slow take up on the existing science park.   |  |
| RN807<br>R Francis   | Why is there such an imbalance between development in the North and South of Charnwood?  |  |
| RN810<br>N Morgan  | Give greater clarity about the number of dwellings which might be needed in Charnwood. Disagree with predict and provide policy of the Government and the fact that housing targets are set by unelected regional government;  |  |
| RN811<br>C Watson  | There should be no building outside current town boundaries on green field sites.  |  |
| RN812<br>A Millie  | Sustainability should be at the core of all development strategies. Using greenfield rather than brownfield locations is hardly sustainable. Eventually greenfield sites run out and the whole borough is built upon.  |  |
| RN890<br>C Clegg   | Clarify how current and future needs are established.  |  |
| RN894<br>D Scott   | <p>Remove specific reference to the science park</p> <p>Add a new clause: 'When releasing sites for development of housing, provision will be made for sufficient car parking to ensure surrounding streets remain unaffected'.</p>  |  |
| RN911<br>J Barber, Woodcock Farms<br><br>Agent: Pegasus Planning Group                           | <p>Amend the document to include housing requirements up to 2026.</p> <p>Amend DCP 4 to relate the phasing periods for housing to the date of adoption of the Site Allocation DPD, to reflect PPS3 and to link with employment development:</p> <ul style="list-style-type: none"> <li>• Draft PPS3 emphasises a continual supply of housing land separated initially in to first 5 years and then a 10 year supply being brought forward as sites become developed. The first 5 years should include allocations that are: <ul style="list-style-type: none"> <li>- developable - available now or being capable of development within 5 years;</li> <li>- suitable – the site offers a sustainable option for development and would contribute to the creation of sustainable urban and rural communities;</li> <li>- viable – housing development that is economically viable on the site.</li> </ul> </li> </ul> |  |

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|  | <ul style="list-style-type: none"> <li>• Brownfield sites must also conform to these 3 tests;</li> <li>• Draft PPS3 requires flexibility. Phasing linked to specific dates is not appropriate;</li> <li>• Draft PPS3 provides illustrative approached to managing the delivery of housing in cases where demand is high, affordability is low, there are limited constraints and high growth (eg Thurmaston). Such locations may require updating of the 5 year housing supply as much as every 2 to 3 years. This would not work under the current policy;</li> <li>• Link to employment – the Charnwood Economic Development Strategy notes a weakness in Charnwood’s economy is the limited supply of available quality employment land.</li> </ul>   |  |
| <p>RN912<br/>Radleigh Homes &amp; Messers Clarke</p> <p>Agent: Pegasus Planning Group</p>  | <p>Amend the document to include housing requirements up to 2026.</p> <p>Amend DCP 4 to relate phasing periods for housing to the date of adoption of the Site Allocation DPD, to reflect PPS3 and to link with employment development:</p> <ul style="list-style-type: none"> <li>• Draft PPS3 emphasises a continual supply of housing land separated initially in to first 5 years and then a 10 year supply being brought forward as sites become developed. The first 5 years should include allocations that are: <ul style="list-style-type: none"> <li>- developable - available now or being capable of development within 5 years;</li> <li>- suitable – the site offers a sustainable option for development and would contribute to the creation of sustainable urban and rural communities;</li> <li>- viable – housing development that is economically viable on the site.</li> </ul> </li> <li>• Brownfield sites must also conform to these 3 tests;</li> <li>• Draft PPS3 requires flexibility. Phasing linked to specific dates is not appropriate;</li> <li>• Draft PPS3 provides illustrative approached to managing the delivery of housing in cases where demand is high, affordability is low, there are limited constraints and high growth (eg Thurmaston). Such locations may require updating of the 5 year housing supply as much as every 2 to 3 years. This would not work under the current policy;</li> <li>• Link to employment – the Charnwood Economic Development Strategy notes a weakness in Charnwood’s economy is the limited supply of available quality employment land.</li> </ul> |  |
| <p>RN913<br/>William Davis</p>   | <p>Support the broad phasing approach in DCP 4.</p>  |  |
| <p>RN916<br/>Martin Robeson on behalf of Persimmon Homes, North Midlands</p>               | <p>Considered that there is an urgent need to identify adequate green field sites in south Charnwood to address historic deficiencies sooner rather than later. Need to allocate sites consistently over the plan period.</p>  |  |
| <p>RN918<br/>Wilson Bowden and David Wilson Homes</p> <p>Agent: Pegasus Planning Group</p> | <p>Amend the document to include housing requirements up to 2026.</p> <p>Amend DCP 4 to relate the phasing periods for housing to the date of adoption of the Site Allocation DPD, to reflect PPS3 and to link with employment development:</p> <ul style="list-style-type: none"> <li>• Draft PPS3 emphasises a continual supply of housing land separated initially in to first 5 years and then a 10-year supply being brought forward as sites become developed. The first 5 years should include allocations that are:</li> </ul>   |  |

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| RN1346<br>A Johnston | Consider phasing housing development and restricting green field development to assist urban regeneration. In Syston former industrial sites are being redeveloped for housing and there is considerable further potential. At present there are several such sites but these developments do not seem to be selling as new dwellings are being built on green-field sites on the periphery of Syston. Over-provision of green-field land for housing is undermining the urban regeneration of Syston and elsewhere.   |  |

Draft Core Policy 5 – Affordable Housing Provision

| Respondents               | Summary of Comments   |  |
|---------------------------|---|--|
| RN14<br>D Liggins         | <ul style="list-style-type: none"> <li>• Allow market housing in villages to secure affordable housing. At present too much emphasis on sustainability issues such as transport above housing needs.</li> <li>• Need definition of ‘local need’ for housing and what is ‘affordable.’</li> </ul>                                      |  |
| RN19<br>C Emmett          | Need to encourage building of high quality homes in built up areas. Otherwise finish up with poor living in towns and rich in villages.   |  |
| RN59<br>K R Senior        | Housing provision should have 60% affordable housing south of Loughborough and north of Quorn.  |  |
| RN60<br>G & P Allen       | Young people prefer to rent.  |  |
| RN129<br>Prof R Bowman    | Uncontrolled expansion of buy to let in Loughborough has raised house prices above national average and removed terraced housing as starter homes. Need a policy giving greater priority to affordable housing needs in the town and setting clear limits on opportunities for student only housing blocks (CS Policies 5 & 14).      |  |
| RN339<br>CPRE (Charnwood) | Strongly support this policy, but with reservations where abuses occur through the break-up of larger sites.  |  |
| RN340<br>A Clift          | In Loughborough the uncontrolled expansion of the buy-to-let market has raised house prices above the national average and removed small terraced starter homes from the housing market. Add policy giving priority to affordable housing needs in the town and setting clear limits on the opportunities for student housing blocks. |  |
| RN342<br>P Breakwell      | Council should be encouraging shared ownership schemes to encourage sociable living, reduce the number of single person households and the amount of land needed for development.   |  |

| Respondents                            | Summary of Comments  |  |
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| RN456<br>Leicestershire County Council | The approach to affordable housing provision is consistent with the Structure Plan and is supported.   |  |
| RN457<br>N Pratt                       | <p>Providing housing for many more homes for single occupancy is counter productive. Many older people have equity in their present house but look for ways of releasing some of it. Younger people/families find it difficult to get onto the housing ladder. They also need family support for the wife to work. Current trend for three storey housing lends itself to providing family homes (as in Germany). Equity sharing could lead to a new house being bought by grandparents and then the upper floors sold to the children. Alternatively, sold as flats or rented.</p> <p>Alternative locations like Tilton on the Hill could be the site for such a development.</p>   |  |
| RN461<br>R Hoyland                     | Integrate affordable housing within private housing developments to avoid creating ghettos.  |  |
| RN470<br>I White                       | In Loughborough the uncontrolled expansion of the buy-to-let market has raised house prices above the national average and removed small terraced starter homes from the housing market. Add policy giving priority to affordable housing needs in the town and setting clear limits on the opportunities for student housing blocks.  |  |
| RN520<br>House Builders Federation     | <p>Affordable Housing requirements should:</p> <ul style="list-style-type: none"> <li>• be flexible and advocate the cascade mechanism where grant funding is unavailable</li> <li>• Be backed up by an up to date evidence base to justify the affordable housing figure being sought and the site size threshold;</li> <li>• Take on board overall viability of schemes (including availability or not of grant funding);</li> <li>• Consider full range of other planning gain requirements;</li> <li>• Be flexible rather than seek rigid percentages of different specific housing tenures</li> </ul> <p>Seeking provision of elements of affordable housing on sites of 5 dwellings or more or 0.15 hectares in settlements of 3000 or less will inevitably deter some sites coming forward.</p> <p>DCP5 contradicts para 4.81, which states that a target in excess of 30% is likely to threaten the viability of sites, particularly previously developed sites in urban areas. The policy refers to seeking to negotiate a minimum of 30% of affordable housing units on all sites over relevant thresholds. Amend policy to seek up to 30% affordable housing provision taking account of other planning gain requirements, the availability of grant funding and individual site viability.</p> <p>Undertake a full and proper (by consulting with local landowners and developers) local housing market assessment to look at the need for all forms of housing (not just social rented) to ensure a robust policy approach.</p> |  |
| RN619<br>Anstey Parish Council         | Support.   |  |
| RN659<br>GOEM                          | <ul style="list-style-type: none"> <li>• DCP5 could include a target for delivery of affordable housing, or else it could be a sub-set of the overall housing target in previous policies as amended.</li> </ul> <p>Setting separate % requirements for both social rented and intermediate housing as in Draft PPS3 (2005) would be beneficial.</p>   |  |
| RN720<br>J Sutherland                  | Support.   |  |
| RN728<br>R Youngs                      | <ul style="list-style-type: none"> <li>• 4.74 &amp; 4.75 Need higher density and more places to rent not buy</li> </ul>  |  |

| Respondents  | Summary of Comments  |  |
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|  | <ul style="list-style-type: none"> <li>4.77 some affordable housing needs to be for rent.</li> </ul>   |  |
| RN741<br>GVA Grimley on behalf of Jelson Ltd                                       | DCP5: affordable housing needs must be based on up to date assessments using a site threshold policy that is Borough specific, and transparent and detailed, preferably at a ward basis and not simply Boroughwide.  |  |
| RN742<br>Redrow Homes  | DCP5: Affordable housing should be reflected in overall allocations rather than as quota. Broadly support policy but needs to be made clear size, type tenure and affordability are matters for negotiation having regard to viability. Acknowledge lowering of site thresholds but suggest on sites where impracticable to introduce 1or 2 dwellings that commuted sums allowed for.  |  |
| RN744<br>S Mitchell  | DCP 5 & 14: Need greater policy emphasis on affordable housing needs in Loughborough setting clear limits on opportunities for student only housing. Too many smaller terraced houses taken out as buy to let properties.  |  |
| RN806<br>A Kay   | This is very important but needs stronger language than "seek to negotiate" and the minimum of 30% affordable housing is absolutely vital  |  |
| RN810<br>N Morgan  | More affordable housing is clearly needed.   |  |
| RN817<br>T Birkinshaw  | Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'. Affordable housing provision is good and should be coupled with measures to stop the current council house stock being eroded by sales.   |  |
| RN906<br>RI Porter   | <p>Make recommendations to give size, location, price, quality and density of affordable family accommodation for rent and purchase. The cost of who pays is an issue that can be solved over time.</p> <p>What happened to affordable housing at the Printhouse, Curzon and Wharf sites?</p> <p>Central Government allows Councils to borrow money to provide social housing. Why has this not happened? Has planning spoke to developers/other Council departments/councillors about this; Could a Section 106 agreement deliver this?</p> |  |
| RN916<br>Martin Robeson on behalf of Persimmon Homes, North Midlands               | Considers that policy is too prescriptive and instead should consider the unique characteristics of each settlement. The policy also fails to consider the financial implication linked to the delivery of affordable housing.   |  |
| RN917<br>Mr & Mrs Westwood   | Concern about the right type of housing being built, specifically needs of elderly need to be addressed through bungalows and not multi-storey properties.   |  |
| RN918<br>Wilson Bowden and David Wilson Homes<br><br>Agent: Pegasus Planning Group | Agree that this should be a policy within a Core Spatial Strategy.   |  |
| RN1295<br>J Shields  | Affordable housing should have mixed tenure and be available for local families.   |  |
| RN1302<br>P A Shone  | In Loughborough the uncontrolled expansion of the buy-to-let market has raised house prices above the national average and removed small terraced starter homes from the housing market. Add policy giving priority to affordable housing needs in the town and setting clear limits on the opportunities for student housing blocks.  |  |
| RN1346<br>A Johnston   | The need for new housing would be reduced considerably if ownership of second and third homes were banned. It is unacceptable and immoral for relatively well-off people to buy holiday homes in villages and thereby deny the opportunity for young local people  |  |

| Respondents | Summary of Comments   |  |
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|             | to live in the village in which they have been born and bred. |  |
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Draft Core Policy 6 – Design Quality

| Respondents  | Summary of Comments   |  |
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| RN19<br>C Emmet  | We must encourage the building of high-quality homes in built-up areas. If not we will finish up with the poor living in towns and the rich living in villages.   |  |
| RN36<br>M C Dolby  | Developments should be good to look at and not “blots” that are landscaped to be hidden from view.  |  |
| RN46<br>Leicestershire<br>Constabulary –<br>Architectural Liaison<br>Officer | Expand paragraph 5.11 criteria (viii) of DCP6 to read: create safe places through the adoption of designing out crime principles to provide <i>well defined routes and spaces</i> , natural surveillance <i>and</i> visibility, <i>places that promote a sense of ownership and community</i> , and well lit environments. (see Safer Places – The Planning System and Crime Prevention, ODPM, page 13).  |  |
| RN59<br>K R Senior   | Strongly agree.   |  |
| RN339<br>CPRE (Charnwood)  | Make social housing indistinguishable in appearance from market housing.  |  |
| RN456<br>Leicestershire County<br>Council                                    | <p>The detailed criteria in this policy address the main issues relating to good design in the Structure Plan, and the policy is therefore supported.</p> <p>The County Council will need to be assured that the density of proposed housing development is consistent with strategic guidance when the Allocations DPD is published for consultation.</p>  |  |
| RN458<br>FKI Plc<br><br>Agent: NAI Fuller<br>Peiser                          | <p>Support DCP 6 in principle but seek amendment:</p> <p style="text-align: center;"><i>...Where appropriate, new development will be required to:</i></p> <p style="margin-left: 40px;">i) <i>reflect a clear understanding of the local physical, social, economic and environmental context for the proposed development;</i></p> <p style="margin-left: 40px;">ii) <i>provide for a compatible mix of uses <del>where appropriate</del>, particularly in town and village centres and main movement routes...</i></p> <p>Accept that the Council should encourage good quality design in new development but requiring all criteria in DCP 6 to be met in all new development is overly restrictive. For example, it seems unrealistic and inappropriate to require an extension to existing premises at the FKI site to ‘secure the retention of features of biodiversity interest including habitats, buffer areas and wildlife corridors’.</p> |  |
| RN460<br>Environment Agency  | <p>The policy needs to ensure that all forms of flood risk are appropriately addressed. In criterion xiv), sustainable drainage systems can be used to manage surface water run-off to reduce flood risk, but are not intended to limit waste water or pollution. Some pollution control techniques, such as the provision of reed beds, can also be designed to attenuate surface water flow. Make clear that development is inappropriate in areas of fluvial flood risk unless it can be demonstrated through flood risk assessment that the flood risk can be mitigated.</p> <ul style="list-style-type: none"> <li>• Criterion xi) seeks the retention of features of bio-diversity interest. However the policy should seek their retention <i>and</i></li> </ul>   |  |

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|  | <p><i>enhancement.</i></p> <p>Scope of the policy is broader than <i>Design Quality</i> and should include reference to the sustainability of design and/or sustainable communities.</p>  |  |
| <p>RN464<br/>The National Forest<br/>Company</p>                               | <p>Point x) – Add reference to implementing the National Forest development planting guidelines for appropriate developments in The National Forest. Pleased that the Borough Council has implemented the guidelines in the past and would wish this to continue in the future.</p> <p>Point xi) – Add reference to managing and enhancing biodiversity features, not just retaining them.</p>  |  |
| <p>RN517<br/>Loughborough<br/>University</p> <p>Agent: GVA Grimley<br/>LLP</p> | <p>Pleased to see that quality in design is a key objective.</p>  |  |
| <p>RN520<br/>House Builders<br/>Federation</p>                                 | <p>No justification to automatically require all developments to incorporate renewable energy and energy saving technologies as it would make development sites unviable. Totally unclear what technologies are envisaged and who will be responsible for the long term care and maintenance. Being non-implementable it should be deleted as it fails test of soundness (viii); is contrary to PPS1 and PPS12 (‘planning policies should not replicate, cut across or detrimentally affect matters within the scope of other legislative requirements...’); and is dealt with by Part M of Building Regulations that are regularly updated; BREAM Eco Homes standards are being abolished and replaced by a voluntary code for sustainable buildings.</p>  |  |
| <p>RN619<br/>Anstey Parish Council</p>   | <p>Strong support.</p>  |  |
| <p>RN659<br/>GOEM</p>  | <p>DCP6 could include further crime reduction proposals and targets. It would benefit from a target for design quality perhaps using policy criteria against which completed development could be audited.</p> <p>Too onerous to require renewable energy installations in all development. Concern at lack of proposals for significant renewable energy generating capacity (RSS Policy 41)</p> <p>DCP 6(xii &amp; xiii) cover matters ultra vires to planning and should not duplicate or replace building control standards. Suggest combining (xii) and (xiii) to give developers a range of options to achieve reasonable levels of energy efficiency (whilst not duplicating building control standards) and renewable energy based on thresholds.</p> <p>Delegating authority to yet unpublished supplementary statements undermines role of the CS as the prime consideration in development control decision making (S38(6) Planning and Compulsory Purchase Act 2004).</p> <p>In (iii) unclear what a “hierarchy of usable spaces” means.</p> <p>In (iv) a hierarchy of uses e.g. pedestrians first, then cyclists, then public transport, then private traffic, would be supported. May help to combine with (v) and (vi).</p> <p>(vii) is unclear as to what this mean in practice.</p> <p>(viii) &amp; (ix) could be combined</p> <p>In (x) landscaping may be more appropriate to the local streetscape context, than the scale of the development. Could be combined with (x)</p> <p>(xiv) should be stronger to provide SUDS e.g. where possible, or linked to flood risk where necessary.</p> |  |
| <p>RN661<br/>A C Johnson</p>   | <p>What does "effect of designing out crime principles" mean? (Sounds like ODPM-speak to me!)</p>   |  |
| <p>RN720</p>   | <p>Strongly support.</p>  |  |

| Respondents  | Summary of Comments   |
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| J Sutherland<br>RN728<br>R Youngs                                    | Need high building standards including renewable energy production eg Woking BC, Yorkshire Forward.   |
| RN741<br>GVA Grimley on behalf of Jelson Ltd                         | DCP6: Too prescriptive and onerous re renewable energy and waste management issues. Need to examine other ways of securing these benefits. Need to delete or reduce these requirements and approach in a graduated manner.  |
| RN742<br>Redrow Homes  | DCP6: Broad support. Comment that caution on how good design achieved. Not necessarily good to relate new buildings to those built elsewhere in a different time period.  |
| RN789<br>H Edwards<br>British Waters                                 | Support.  |
| RN796<br>T Stott   | Generally very positive and builds Leading in Design into the LDF as policy. Strengthen the final statement to read 'must be supported'. Otherwise developments could fail to meet the sustainable development objectives. There must be an absolute requirement and a tougher approach for developments to have high environmental standards.  |
| RN799<br>A H Olofsson  | Good design is vital, and will have an impact on Charnwood's future. And the same with businesses, what they find attractive, will attract.   |
| RN817<br>T Birkinshaw  | Concerned that 'sustainable development' is being misused when it should be 'least Unsustainable'<br>Walking and cycling should open up countryside and enhance access between old and new parts of Loughborough.<br>Wish to see specific mention of green corridors (new and old developments) and 'critical mass' of wildlife area; increasing old and ensuring new is not just fragments of scrappy trees, patches of grass. |
| RN824<br>National Trust  | DCP6 – well written and strongly supported. Improve by referring to 'appropriate native landscaping' in x), and seeking not just retention but also <u>enhancement</u> of biodiversity features in xi).   |
| RN916<br>Martin Robeson on behalf of Persimmon Homes, North Midlands | Policy too prescriptive for Core Strategy and should be shortened. The policy's content would be more suited to Generic Development Control DPD.  |
| RN1293<br>Loughborough Gospel Hall Trust<br><br>Agent: J & J Design  | Should provide positive support for a breath of community needs including new places of worship, to meet the moral and spiritual needs of communities and so support the objectives of reducing crime, anti-social behaviour and improving community safety. Support for voluntary/non profit organizations including faith groups is needed to address these issues.   |

Draft Core Policy 7 – Countryside and Landscape Character

| Respondents                    | Summary of Comments   |
|--------------------------------|---|
| RN22<br>National Farmers Union | Paragraph 5.17 - agree with the statement about the plethora of designations, too confusing.<br>Paragraph 5.20 - do not agree with the continuation of special landscape areas. Insufficient justification and too limiting to development within designated areas.<br>Paragraph 5.21 - wish to see additional category f) under criteria iii) to allow for conversion of farm buildings to dwellings where |

| Respondents  | Summary of Comments  |  |
|--|--|--|
|  | agricultural workers do not need housing or employment/ tourism uses are not needed or viable.   |  |
| RN37<br>N L Sharpe (and on behalf of R Truslove, Ms A Sharp) | Need greater protection of countryside.  |  |
| RN59<br>K R Senior   | Strongly agree.  |  |
| RN240<br>P A Summers   | Recognise the importance of the countryside as a resource for agriculture and leisure.   |  |
| RN339<br>CPRE (Charnwood)                                    | Need to guard against land becoming degraded and therefore being judged ripe for development.  |  |
| RN456<br>Leicestershire County Council                       | The approach is consistent with the Structure Plan and is supported.<br><br>The County Council will need to be assured that detail of the control of development in the countryside is consistent with strategic guidance when the General Development Control DPD is published for consultation.  |  |
| RN464<br>The National Forest Company                         | iii) – In a) add reference to new timber and woodland related businesses also supporting the rural economy; and in e) the particular benefits of renewable energy installations, such as wood fuel, should be highlighted.   |  |
| RN619<br>Anstey Parish Council                               | Strong support.  |  |
| RN659<br>GOEM  | DCP7 does not offer the level of support for energy installations in the countryside implicit in RSS8 Policy 41. It should be made clear that “energy installations” includes wind turbines.<br>Delegating authority to yet unpublished supplementary statements undermines role of the CS as the prime consideration in development control decision making (S38(6) Planning and Compulsory Purchase Act 2004).<br>The policy would benefit from a target / monitoring indicator, for example an impartial assessment of social, economic and environmental health of different landscape character areas<br>(i) needs to refer to appearance of the landscape. Views are not material planning considerations. Unreasonable to require all development in the countryside to enhance local character<br>(iii) needs to include gypsy and traveller development; conversion of existing buildings to alternative uses, including residential use and should include a specific reference to farm diversification. |  |
| RN662<br>English Heritage                                    | In order to highlight the historic component of landscape character, most often field patterns, amend i) to read:<br>“...including features such as biodiversity, views, field and settlement patterns and local character...”<br><br>In iii) e as telecommunication and energy installations can have unacceptable impacts on the historic environment these issues need to be addressed in detailed policies.  |  |
| RN720<br>J Sutherland  | Strongly support.  |  |
| RN789<br>H Edwards<br>British Waters                         | Support - this policy recognises the need for development in the open countryside which is associated with non-footloose assets such as waterways.   |  |
| RN795<br>J Faulks  | Protect the river view, frontage and side fields as a natural resource for the whole community   |  |

| Respondents                              | Summary of Comments  |
|--|--|
| Normanton on Soar Parish Council         |  |
| RN817<br>T Birkinshaw                    | Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'<br>Noisy and light-polluting recreational activities should be excluded from countryside developments. |
| RN824<br>National Trust                  | DCP7 is supported but amend i) to read '...biodiversity, views, <u>heritage</u> , settlement pattern...'   |
| RN1293<br>Loughborough Gospel Hall Trust | Fails to address wider needs of communities for meeting places including church halls as highlighted in PPS7 para 7.   |
| Agent: J & J Design                      |  |

Draft Core Policy 8 – The National Forest

| Respondents                            | Summary of Comments   |
|--|---|
| RN22<br>National Farmers Union         | Paragraph 5.22 - object to the resistance to new tourism facilities in the National Forest. The text of the plan does not spell out why such development should not be allowed.   |
| RN456<br>Leicestershire County Council | The National Forest in Charnwood is also mostly within the Charnwood Forest Policy Area, where particularly strict control on development is required. The draft policy provides an appropriate amount of control in line with the Structure Plan and is supported.   |
| RN464<br>The National Forest Company   | Policy should state the Council's support towards implementation of The National Forest Strategy, 2004-14 and include a positive statement on the types of development acceptable in the Forest area similar to Lichfield District Council's Submission LDF. First paragraph should refer to the National Forest development planting guidelines, within the context of "creating a woodland setting reflecting the National Forest context". Other appropriate green infrastructure (e.g. heath land creation) or commuted sums should also be highlighted, in instances where sufficient on-site woodland planting and landscaping may not be possible. Second paragraph seems unnecessary if the policies contained in DCP 7 apply to The National Forest. Delete in favour of a positive statement on the types of development that are acceptable. Confusing as to whether all layers of policy relate to the National Forest area. The general principles for development in the countryside are particularly relevant for the National Forest. Confirm whether this policy relates to The Forest area, as do policies 8 and 9. |
| RN619<br>Anstey Parish Council         | Support.  |
| RN659<br>GOEM                          | DCP8 lacks targets. Recording the amount of new planting in the National Forest is included in the monitoring framework but is not the focus of DCP 8.<br>Apparent tension between DCP8 and DCP9 is best resolved by amending DCP8 to reflect relevant objectives and aims of the National Forest Strategy to add value to economic development.  |
| RN720<br>J Sutherland                  | Support.  |
| RN817                                  | Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'. Good.  |

| Respondents                             | Summary of Comments |
|---|---------------------|
| T Birkinshaw<br>RN824<br>National Trust | Supported.          |

Draft Core Policy 9 – The Charnwood Forest

| Respondents                            | Summary of Comments   |
|--|---|
| RN456<br>Leicestershire County Council | The criteria are broadly consistent with the Structure Plan and the draft policy is supported.  |
| RN619<br>Anstey Parish Council         | Support.  |
| RN659<br>GOEM                          | DCP9 lacks targets.<br>Apparent tension between DCP8 and DCP9 is best resolved by amending DCP8 to reflect relevant objectives and aims of the National Forest Strategy to add value to economic development.<br>DCP 9 needs robust appraisal as required by PPS7 if the intention is to provide a stronger level of landscape protection.  |
| RN662<br>English Heritage              | RSS8 Policy 27 indicates unavoidable damage to irreplaceable assets from development should be minimized by mitigation measures with compensation measures only where harm could not be mitigated. Amend DCP9 to read:<br><br>" Development which could adversely affect these special qualities will not be permitted unless a clear overriding need can be demonstrated and appropriate <i>mitigation, and if appropriate, compensation measures</i> are proposed." |
| RN720<br>J Sutherland                  | Support.  |
| RN817<br>T Birkinshaw                  | Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'. Good.  |
| RN824<br>National Trust                | Supported.  |
| RN913<br>William Davis                 | The policy should set out a commitment to define detailed boundaries of a Charnwood Forest Policy Area based upon current landscape character assessment guidelines.  |

Draft Core Policy 10 – Settlement Identity

| Respondents  | Summary of Comments  |
|--|--|
| RN37<br>N L Sharpe (and on behalf of R Truslove, Ms A Sharp) | Need greater protection of countryside and our green wedges. Villages must remain distinct from towns. |
| RN59   | Strongly agree.  |

| Respondents                   | Summary of Comments   |  |
|-------------------------------|---|--|
| K R Senior                    |   |  |
| RN97                          | Need to retain green wedges and keep separate identities of settlements.  |  |
| A Davis                       |   |  |
| RN339                         | Support.  |  |
| CPRE (Charnwood)              |   |  |
| RN355                         | Concern about landscape and village identity issues about ribbon development along the Soar valley.   |  |
| J Booth                       |   |  |
| RN374                         | Policies appear one-sided concentrating on destroying green wedge between Loughborough/ Hathern/ Shepshed.  |  |
| J Wilson                      |   |  |
| RN452                         | No clear reference to what criteria will be used to review Green Wedges.  |  |
| D Snartt (Councillor)         | Areas of Local Separation will need strengthening to keep the desired state of distinct village identity especially within the Charnwood Forest area.   |  |
| RN456                         | The policy is consistent with the Structure Plan and is supported.  |  |
| Leicestershire County Council | The County Council will need to be assured that the specific boundaries of green wedges are consistent with strategic guidance when the Allocations DPD is published for consultation.  |  |
| RN464                         | Support the intention to define a Green Wedge between Loughborough and Shepshed and to safeguard existing Green Wedges between Anstey and Cropston and Anstey and Groby. The intention to support recreational facilities and to preserve strategic landscape and wildlife links are also supported.  |  |
| The National Forest Company   |   |  |
| RN520                         | Should not allocate land as Green Wedge that may be needed to meet the district's housing needs. Precise status and merit of individual Green Wedges nature is questionable.  |  |
| House Builders Federation     |   |  |
| RN619                         | Strong support (especially (d)).  |  |
| Anstey Parish Council         |   |  |
| RN659                         | DCP10 as a strategic policy would be better in Chapter 4 Development Strategy.  |  |
| GOEM                          | Accept Green Wedge policies around Leicester have provided a strategic tool for development planning but the function of Green Wedges around Loughborough is very different. They do not extend into the town directing growth, preserving wildlife corridors or maintaining the identity of constituent elements. Effectively unofficial greenbelts they should be dispensed with. |  |
|                               | Areas of Local Separation are not strategic and should also be dispensed with.  |  |
|                               | There may be grounds for extending Green Wedges over former Areas of Local Separation around the Leicester PUA where areas meet Green Wedge functions.  |  |
|                               | No target despite a monitoring output of development in green wedges.   |  |
| RN662                         | Green wedges are part of green infrastructure encompassing historic sites. Para 5.31 refers to the proposed Thurmaston/ Hamilton green wedge which could include the two scheduled monuments in this area and it might be appropriate to seek public access/ interpretation of these sites. An additional point should be added to :  |  |
| English Heritage              | "Provide for the protection and enhancement of natural and historic assets within the area"   |  |
| RN720                         | Strongly support.   |  |
| J Sutherland                  |   |  |
| RN742                         | Accept may need to redefine existing green wedges as a result of land allocations but new development areas should not necessarily trigger need for further green wedges.   |  |
| Redrow Homes                  | Accept need to properly safeguard separation between any extension of Hamilton and Barkby and would not object to a new green wedge for this specific objective.  |  |
|                               | Doubtful that areas of local separation continue to serve useful purpose as they duplicate green wedge and countryside policies.  |  |

| Respondents  | Summary of Comments   |  |
|--|---|--|
| RN795<br>J Faulks<br>Normanton on Soar<br>Parish Council                     | Clarity is needed about Green Wedge between Loughborough and Hathern as green space provision and to protect communities of Hathern and Normanton.  |  |
| RN796<br>T Stott   | Safeguard settlement identity within Loughborough, Birstall and Shepshed and create districts/neighbourhoods, otherwise these become over-large amorphous masses.<br>It appears that last Plan's Green Wedges (at least around Loughborough) have become this time's building land.   |  |
| RN815<br>R Parsons   | Essential to protect identities of these villages. If not we will be have an urban sprawl where no-one will wish to live.   |  |
| RN817<br>T Birkinshaw  | Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'<br>Need settlement identity within Loughborough to create/enhance districts/neighbourhoods.<br>Need a Green Wedge to protect Barkby, Beeby, Syston from Leicester/Thurmaston, and Woodthorpe and Woodhouse from Loughborough.<br>Why not use Green Belt which afford real protection and cannot be 'remodelled' at each new plan?   |  |
| RN824<br>National Trust  | Support.  |  |
| RN891<br>A Cooper & J M<br>Hornbuckle  | Housing development could be directed to north of Birstall on Butchers Lane, in the vicinity of the area of local separation, outside areas subject to flooding at Wanlip, whilst satisfying this policy.   |  |
| RN892<br>A Cooper, MW<br>Hornbuckle, LM<br>Cooper (dec'd) & JM<br>Hornbuckle | Housing development could be provided north of Thurmaston immediately north of Barkby Thorpe Lane, west of the railway line, whilst satisfying this policy.   |  |
| RN1295<br>J Shields  | Existing settlements must retain their identities by adopting a Green Wedge policy wherever possible.   |  |
| RN1297<br>J Ridewood   | Protect village boundaries and character.   |  |
| RN1347<br>Charnwood Liberal<br>Democrat Councillor<br>Group                  | Support the regional review of Green Belts and Green Wedges but concerned stronger policies for Derby and Nottingham will direct housing development towards Leicester;<br>Housing and employment land allocations should be balanced by allocation and maintenance of Green Wedges. Development and green areas are equally important;<br>Oppose the erosion and weakening of Green Wedges but accept there may be a need for adjustment;<br>Total area of Green Wedges should be maintained or expanded;<br>Work closely with Partners such as Action for a Better Charnwood to identify potential additional Green Wedges.<br>Support protection of village identity as it is linked to the community cohesion agenda. Strong communities offer the best chance of developing the potential of individuals;<br>Oppose any homogenisation of individual villages – their separate identity needs protecting. The allocation of land for development should avoid linking separate villages. |  |

| Respondents                          | Summary of Comments   |  |
|--------------------------------------|---|--|
| RN41<br>Jacqueline Sutton            | How can new health facilities be built when current ones are under funded and closing eg Rosebery school.   |  |
| RN59<br>K R Senior                   | Strongly agree.   |  |
| RN339<br>CPRE (Charnwood)            | Agree.  |  |
| RN460<br>Environment Agency          | Include the provision <i>and maintenance</i> of drainage infrastructure. It needs to be ensured that balancing ponds are provided to manage flood risk that their adoption and maintenance is secured through the planning system.  |  |
| RN464<br>The National Forest Company | This should state that developers will (not may) be invited to provide and contribute towards green infrastructure and highlight the types of green infrastructure that will be sought eg. woodland planting, habitat creation and management, new public access and recreation facilities, enhanced protection and management of heritage assets.  |  |
| RN520<br>House Builders Federation   | <p>Document gives impression that new development is being expected to rectify deficiencies in existing facilities and services and would be contrary to Circular 5/2005:</p> <p>Development should only be required to make provision for those facilities:</p> <ul style="list-style-type: none"> <li>~ that are necessary as a direct result of new development and</li> <li>~ which fairly and reasonably relate in scale and kind to the development proposed.</li> </ul> <p>There has to be reasonable prospect of money being spent within a reasonable period for the purpose for which the contribution was sought and within a reasonable proximity of the development from which it was sought.</p> <p>Applying the requirement to all development is not a satisfactory way forward, regardless of the nature of existing open space provision in the Borough. A low threshold will require a great deal of resources and effort to implement and administer such a scheme effectively and in line with Circular 5/2005 ie. Each contribution should be directly accountable and traceable.</p> <p>Amend policy to apply to developments over 15 dwellings (net gain).</p> <p>Plan should not be used to tax development in an arbitrary, unjustified and excessive manner. Should be made clear that any requirements will be applied sensibly, reasonably and flexibly taking into account all material considerations so that we can arrive at what we all want – high quality, sustainable development and places in which we all want to live.</p> |  |
| RN619<br>Anstey Parish Council       | Support.  |  |
| RN659<br>GOEM                        | <p>DCP11 should provide a level of certainty as to what developers will be required to contribute to, and what facilities will be provided as a result.</p> <p>Noted that no target for the policy is proposed.</p> <p>The statement that physical and community infrastructure projects necessary to support development will be permitted appears to pre-judge whether such development would contravene established policy.</p> <p>(i) should clarify that off-site provision will not be required when suitable on-site provision is proposed, and may need to refer to maintenance of such provision.</p> <p>(ii) needs to define “social” and “community” needs, and how they differ from educational, recreational and sporting needs. Supporting text refers to cemeteries which could be reasonably related to development, and to a mental health unit, which probably relates to extant need.</p> <p>(iii) could be read as implying that special needs housing may be a requirement of new development.</p> <p>(iv) mitigation should only be required as a secondary option where harm to the issues of acknowledged importance cannot be avoided.</p>   |  |

| <b>Respondents</b>   | <b>Summary of Comments</b>  |
|--|---|
| RN662<br>English Heritage  | Provision of new facilities or amenities would not 'offset or mitigate' the impact of development on 'recognised heritage sites' that are irreplaceable if development resulted in the loss of part or all of the asset. Wording of policy needs to be reconsidered re historic sites,  |
| RN720<br>J Sutherland  | Support.  |
| RN721<br>Network Rail  | CS indicates sustainable development may require contributions towards public transport infrastructure. Most examples relate to bus provision. While this is supported there is no mention of improving rail based services.<br>Network Rail funds maintenance of the existing railway but has no funding for enhancements.<br>DCP11 could be expanded to provide for rail station upgrading works. Any increase in passenger demand from new development should contribute to increasing capacity at Loughborough station. The station would benefit from extension of platforms to avoid longer dwell times and improve safety. In addition contributions towards better disabled access are needed. The amount of contributions can be determined through Travel Plans/ traffic assessments for applications in Loughborough including the Science Park.<br>Could usefully indicate that contributions from developers should be pooled in line with Circular 05/05 to mitigate their impact on the railway. |
| RN742<br>Redrow Homes  | Broad support provided policy complies with Circular 05/05 and expectations are reasonable.   |
| RN789<br>H Edwards<br>British Waters   | Support.  |
| RN824<br>National Trust  | Support.  |
| RN918<br>Wilson Bowden and<br>David Wilson Homes<br><br>Agent: Pegasus<br>Planning Group | Policy must make it clear that infrastructure must be reasonably related to the development proposed and for larger sites must be phased along with development.  |
| RN1347<br>Charnwood Liberal<br>Democrat Councillor<br>Group                              | Support the improvement of community and recreational facilities, improved access to jobs and services and the promotion of alternatives to the car as part of an integrated sustainable land use and transport strategy. However, action needs to be taken. Leisure and Cultural Services should initiate a project to carry this forward and work closely with the County Council to review parking policy and promote alternatives to the car.   |

Draft Core Policy 12 – A Strategy for Regeneration

| <b>Respondents</b>            | <b>Summary of Comments</b>   |
|-------------------------------|--|
| RN59<br>K R Senior            | Totally disagree.  |
| RN95<br>Great Central Railway | Social inclusion can be achieved in the context of what the GCR can offer the Borough. |

| Respondents                                      | Summary of Comments   |  |
|--|---|--|
| PLC  |   |  |
| RN339<br>CPRE (Charnwood)                        | Agree.  |  |
| RN456<br>Leicestershire County Council           | <p>The existing network of libraries and mobile library service within Charnwood is of significance and should be taken into account particularly in relation to DCP12. Working in partnership with other agencies and local communities the Borough Council will take action to improve the quality of life for residents living in areas of relative deprivation.</p> <p>iii) - Libraries provide access to ICT facilities and on-line services, and work in partnership with Adult Learning Service providing learning opportunities including literacy support.</p>   |  |
| RN458<br>FKI Plc<br><br>Agent: NAI Fuller Peiser | <p>Support in principle. The Council should look to secure local opportunities for employment by safeguarding existing employment areas. This will ensure that important employment sites across the Borough, including the FKI site, are protected from development that may have a detrimental impact on their operations.</p>  |  |
| RN523<br>SureStart<br>Loughborough East          | <p>Welcome (ix) and the link to the Charnwood Community Cohesion Pathfinder in Chapter 5, and particular focus on the Charnwood Renewal Framework including areas covered by SureStart (Should there be a reference to the Charnwood Renewal Framework on page 2 of the list of work undertaken?). Simply including a policy may not be sufficient. Not clear previous policies have managed to address problems, as stated in paragraphs 5.5 and 5.51 on page 63.</p> <p>Sure Start Charnwood focuses on Shelthorpe, Hastings and the south part of Lemyngton. Need to ensure that overall objectives of SureStart are taken in to account in the LDF. SureStart is part of a national government programme targeted at most deprived communities to develop infrastructure, opportunities and services to support families in giving young children the best possible start in life. Also aim to 'mainstream' the programme so changes and developments are sustainable as part of the fabric of life for families with young children. The LDF is a key statutory vehicle to enable some 'mainstreaming' by delivering the quality of environment, places of employment, parks and meeting spaces, community infrastructure and other services. Keen to ensure that the Council understands the issues faced by Surestart families and to encourage the Council to consider utilising planning tools to help regenerate this deprived area.</p> <p>A User Satisfaction Survey carried out by the Centre for Research in Social Policy at Loughborough University (CRiSP) identified a number of issues we wish to highlight where the Planning system has the potential to provide a vehicle for delivery:</p> <ul style="list-style-type: none"> <li>• Local employment opportunities within walking distance of the Sure Start area. Local traditional manufacturing has been lost with threats of further employment loss in an area with low car ownership and highest percentage of people using public transport, walking or cycling to work. A key national Sure Start objective is to increase opportunities for parents of young children to enter work.</li> <li>• Community Infrastructure - Meeting places to overcome isolation and access to health care and other service.</li> <li>• Open Space and Play Infrastructure. The overwhelming majority - around 82 %of the respondents to the survey - identified local outdoor play facilities and access to open spaces as an area needing improvement.</li> </ul> <p>Two considerations would help to strengthen the deliverability of the policy and help to actually address problems recognised since the 1970's:</p> <p>1. More effective Relationship between the Community Strategy 2005 Key Actions and Core Strategy.</p> |  |

| Respondents | Summary of Comments   |  |
|-------------|---|--|
|             | <p>The Key Action Areas include land use regeneration for East Loughborough and the town centre. The CS recognises the revised Community Strategy but does not develop links with key action areas to target land-use related elements in conformity with policy and deliverable through the LDF. Checklist 8a in the Companion Guide to PPS12 'Creating Local Development Frameworks' provides a good framework to develop effectively the relationship between the community strategy and the LDF. It suggests the consideration of a range of documents that may assist in delivering the land-use related elements of the community strategy.</p> <p>2. Consideration of an Area Action Plan for parts of Hastings Ward<br/>This would strengthen deliverability and maximise benefits for local communities by providing a delivery framework for area based regeneration initiatives, particularly where there are important land use issues. Integration with community strategy action plans is one example; the AAP could provide a useful 'joining-up' role arguably lacking at present. The AAP could set development objectives, specifying and coordinating requirements for new infrastructure and services.</p> <p>If staff, timing and financial implication of producing an AAP are important considerations could pool resources from other agencies eg SureStart, Leicestershire Economic Partnership, British Waterways Board. Work could be delayed and not take precedence over critical LDF documents. The AAP provides the statutory support required in helping to address the spatial and land based issues. An AAP could deliver things not already happening:</p> <p>Employment - Real concerns about the loss of local employment sites within walking distance – particularly in Hastings - to higher value housing. The area has relatively high levels of unemployment and is in the top 20% on a number of domains of Indices of Deprivation. Public sector intervention is needed for a proactive approach encouraging a 'new employment product' for parts of this area:</p> <ul style="list-style-type: none"> <li>~ Modern refurbished employment infrastructure would help attract modern users focused on small scale workspace units and creative sector developments.</li> <li>~ Mixed use developments within the Surestart area, so some employment infrastructure is retained and enhanced within walking distance. Promote explicitly in a policy statement.</li> </ul> <p>Open space for recreational use. Substantial green open space 'lungs' are needed in Hastings and Lemington areas. There is a very urgent need for a country park facility in East Loughborough. This requires coordinated, regeneration action planning, which brings development resources and packages together landfill sites, waterway/canal access and flood plain land that are currently constraints, unsightly and inaccessible. Need a clear plan/ delivery strategy using developer contributions. At present the area faces very high density new developments and a major lack of public, green / meeting spaces. An AAP could provide the tool to designate and develop a delivery mechanism to provide improved environment, health and liveability in line with the Government target to deliver cleaner, safer, greener public spaces and to improve the quality of the built environment in deprived areas with measurable improvements by 2008 (Securing the Future – delivering UK sustainable development strategy).</p> <p>Health and Air Quality issues. Residents in the SureStart area suffer relatively more in terms of poor health problems and lack of access to health facilities. The AAP could consider how to mitigate potential air pollution problems that could arise from proposals such as the Inner Relief Road.</p> <p>Coordinated action to address other issues relating to poor quality private housing, the need for public realm community facilities for young and older people, access to jobs and training, areas of vacancy, underutilised space and dereliction. There are currently a</p> |  |

| <b>Respondents</b>   | <b>Summary of Comments</b>  |
|--|---|
|  | number of agencies operating in this part of the Borough. However there is a lack of some form of overall coordination to ensure maximum impact. An AAP linked to the Community Strategy could provide the process and mechanism to bring this about.   |
| RN619<br>Anstey Parish Council   | Support.  |
| RN659<br>GOEM  | DCP12 would be improved by indicating what action will be achieved, where it will be concentrated or what effect it will have on affected communities.<br>Noted that no targets are proposed, despite a monitoring framework to record the proportion of residents living in wards ranking amongst the 10% and 25% most deprived. If it is inappropriate for DCP12 to identify targets could use a 'process' target to develop site specific strategies.<br>In (i) the commitment to safeguard existing employment areas should be reviewed for outdated sites / poor locations unattractive to modern business as this is likely to lead to dereliction to the detriment of neighbourhood community. |
| RN720<br>J Sutherland  | Support.  |
| RN742<br>Redrow Homes  | DCP12: Support. Wish to see reference to opportunities for regeneration of sites for housing, notably in Loughborough.  |
| RN789<br>H Edwards<br>British Waters                                   | DCP 12: In relation to criteria l) careful consideration should be given to which employment sites are safeguarded. Redundant employment sites should be considered favourably for alternative uses in accordance with Paragraph 42a of PPG3 as they represent a wasted resource. Such sites can often be found along inland waterways despoiling the environment and prohibiting public access to and from the water.  |
| RN810<br>N Morgan  | Place much greater emphasis on regenerating Shepshed.   |
| RN824<br>National Trust  | Supported.  |
| RN1293<br>Loughborough Gospel<br>Hall Trust<br><br>Agent: J & J Design | Address the lack of reference to improved learning, skills and employability for all sections of the community in the Core Strategy. Recognise the contributions made by the voluntary and not for profit sector, including faith communities, in regeneration and the need for moral and spiritual issues to be included to underpin the promotion of a strong community with reduced crime. Anti-social behaviour and increased community safety.   |
| RN1347<br>Charnwood Liberal<br>Democrat Councillor<br>Group            | Support the strategy for social inclusion. However, the existing lack of leisure and community facilities particularly for young people in some areas. This needs to be tackled in a structured manner.   |

Draft Core Policy 13 – Loughborough University

| <b>Respondents</b>    | <b>Summary of Comments</b>  |
|-----------------------|---|
| RN27<br>Dr A M Clarke | Future University expansion should take place on University land or land south of A512<br>Increased University accommodation needed for increased student numbers to prevent adverse impacts of buy to let increasing prices of small houses and resulting in a lack of affordable homes for young people, loss of family environments in parts of town, closure of some schools and greater pressures on others (Robert Bakewell). |

| Respondents  | Summary of Comments  |  |
|--|--|--|
| RN339<br>CPRE (Charnwood)  | Agree  |  |
| RN517<br>Loughborough<br>University<br><br>Agent: GVA Grimley<br>LLP | <p>The University welcomes policy support for new University facilities (although it has some concerns about the types of development specified in the policy) but it has very serious concerns about the apparent attempt to control student numbers and require provision of additional managed residences. In response to the draft Student Housing SPD, the University warned against this approach and invited discussions. Unfortunately, the Borough Council did not engage with the University on this matter, disregarded its objections, and adopted this part of the SPD as drafted.</p> <p>Insofar as the first paragraph of DCP 13 is concerned, reference should either be made to the full range of developments the University might need to bring forward, or simply confirm support for any University related development within the defined areas. The University prefers the latter approach. However, if the Council determines that it should list those developments and facilities for which planning permission will be granted, then the University would like to contribute to this to ensure that the policy is clear and precise.</p> <p>Also, the University considers that the caveats: 'additional improved facilities' and 'more efficient use of land' should be deleted. The University is not in the business of seeking approval and funding for development which is wasteful or not needed, but it cannot guarantee that every proposal it brings forward will result in the provision of 'additional improved facilities'. Also, it cannot guarantee that every development it requires will make 'more efficient use of land'. To avoid complications and unnecessary challenges in the future, these references should be omitted.</p> <p>The University's concerns about paragraphs 2 and 3 of DCP 13 (and the supporting text within paragraphs 5.61, 5.62 and 5.63) are numerous and relate to:</p> <ul style="list-style-type: none"> <li>• prominence given to student accommodation matters and lack of balance;</li> <li>• the Council's underlying assumptions about the correlation between student numbers and University floorspace;</li> <li>• the need for, and likely effectiveness of the student housing requirement;</li> <li>• the damaging financial and operational consequences for the Institution;</li> <li>• the apparent lack of option testing; and</li> <li>• the lack of clarity and precision in the words used.</li> </ul> <p>With regard to the issue of balance, a number of the references the DPD makes to the University have a positive tone. Indeed, on several occasions, the DPD notes the contribution the Institution makes to the local and Regional economies. However, these benefits are not quantified, and there is no mention of the social and cultural contributions the University makes. All three are significant and provide a compelling context when seeking to weigh the pros and cons of the University's presence in the town.</p> <p>Insofar as the economic impacts are concerned, the University has recently commissioned research which examines factors such as job creation, University spend, staff and student spend, and income levered into and retained within the Region and the Borough. Of particular interest in the context of DCP13 is the contribution University students make to the local economy, and in particular that of the town. In 2005, direct spend by students (in the local area) has been provisionally calculated at £53 million with between £6 million and £38 million additional spin-off expenditure.</p> <p>Notwithstanding the benefits the University brings to the town, the DPD also contains a substantial number of negative</p> |  |

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|             | <p>statements focused on concerns some local people have about the impact of concentrations of unmanaged off-campus student housing relating primarily to residential amenity but also operation of the local housing market. This is highlighted repeatedly and, in the University's opinion, is presented in an unbalanced manner. Whilst the University acknowledges the concerns expressed by local people, and will continue to work to improve conditions, it is considered that the Council has not properly weighed the advantages and disadvantages of the University's presence. The response, DCP 13, is excessive, unreasonable and likely to be damaging in its consequences to the University, the town and the Region.</p> <p>Insofar as the student population / floorspace correlation is concerned (see Core Strategy paragraphs 5.61 and 5.62 also), it appears to the University that the Council has founded the second paragraph of DCP 13 on the assumption that with every new University development (replacement floorspace and new facilities - even support and ancillary development) there will be a subsequent and commensurate rise (whatever this means) in the number of students enrolled. There is no direct correlation or connection, and certainly not a relationship that can be accurately measured. By way of example, the University's Estate Strategy has confirmed that there is a need to provide an additional 81,000 sq.m. of academic and research floorspace within the campus by 2020. However, during this period, the University expects there to be little or no growth in the undergraduate population (see below). There will be a significant number and range of other developments which the University might contemplate during the next 10-15 years that also would have no bearing upon the size of the student population (but would be calculated to bring economic and R&amp;D benefits to the town). Inward R&amp;D investment has, quite simply, no connection with student numbers, nor with the quite different Government policy frameworks and funding regimes that affect student numbers and the accommodation that is required for the student population. The premise on which the second paragraph is based is flawed and the policy is, therefore, unsound.</p> <p>With regard to the need for and effectiveness of DCP 13, the following points should be noted:</p> <ul style="list-style-type: none"> <li>• the concerns raised by local people are primarily amenity driven and are caused by concentrations of unmanaged housing occupied by full-time undergraduate students (not housing occupied by post-graduate students);</li> <li>• whilst both the undergraduate and postgraduate student populations have grown in recent years, the University is not now anticipating a material change in the size of the UK/EU undergraduate population in the period up to 2020 (regardless of new development carried out);</li> <li>• notwithstanding (b) above, the University is planning to build additional student residences on campus, with Phase I programmed for completion by 2008. Provision of this new accommodation will help to reduce the number of students living in unmanaged housing off-campus;</li> <li>• there has been no analysis of demand for managed accommodation to confirm that, if more managed residences were to be provided beyond those planned by the University, these would be taken up. Policy 13 may, therefore, be requiring development that is unsustainable in planning and financial/operational terms. Students cannot be compelled to live in managed accommodation whether this is on or off-campus and despite the obvious advantages of it, not all students find these advantages sufficiently compelling; and</li> <li>• the Council's student housing SPD contains a thorough analysis of the student population / accommodation issue and provides a detailed control mechanism designed to address the concerns local people have raised. It determines acceptable levels of student housing within discrete parts of the town and then ensures the application of a hierarchical policy which should limit growth in student households in sensitive locations. However, the SPD acknowledges that it would be unreasonable to prohibit the development of additional unmanaged residences and allows also for the provision of additional managed accommodation in locations that satisfy the policy tests. There is no mention within the SPD of an upper limit for unmanaged residences. If the Borough Council accepts, as the SPD confirms, that it is not necessary to prevent the</li> </ul> |  |

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|             | <p>development of additional unmanaged accommodation within the town, there can be no overriding justification for demanding additional managed residences on the back of new University development (particularly in the light of (b) above). There is an inconsistency in the way the Core Strategy and the SPD quantify the student housing need and the way in which they seek to address it. Both cannot be sound.</p> <p>With regard to financial matters (and particularly to procurement and financial risk), and in the light of the other concerns noted within this section, the second paragraph of Policy 13 places an excessive, unreasonable and insurmountable burden upon the University, and is simply unworkable (see also paragraph 4.11 above).</p> <p>Insofar as option testing is concerned, DCP13 is seriously lacking. The only alternatives considered by the Borough Council are 'do nothing' and 'limit the growth of the University'. Without prejudice to the various concerns noted elsewhere in this section, there is no evidence in the DPD of the Council having considered:</p> <ul style="list-style-type: none"> <li>• the actual number of managed residences it needs to secure during the life of the DPD and how this would be specified within DCP13;</li> <li>• distinguishing clearly between types of development and land use that will be caught by the DCP13 requirement and those which shall not;</li> <li>• if there is a more precise and credible way in which the student housing requirement can be articulated (rather than using the words "in line with the increase in student numbers");</li> <li>• whether it would be more productive to monitor, for a period, the performance of the recently adopted Student Housing SPD before introducing a DCP13-like policy;</li> <li>• the merits of identifying sites for managed student residences within the town to encourage private sector investment/involvement, thereby reducing the burden on the University; and</li> <li>• different thresholds (paragraph 2 of DCP13) could be used - why are 6,400 and 5,400 better than, say, 7,000 and 6,000 (or an infinite number of alternatives)?</li> </ul> <p>Related to the above is a serious concern that the DPD does not describe with sufficient clarity why the Borough Council has selected the preferred option and how it has arrived at this conclusion. In particular, the DPD dismisses the idea of limiting the growth of the University, for sound economic and other reasons, but then includes a Preferred Option which has the propensity to do exactly that, with all its obviously damaging consequences.</p> <p>Insofar as clarity and precision are concerned, DCP 13 has been constructed and presented in a clumsy and cumbersome fashion. As a consequence, it is extremely difficult to interpret, contains inconsistencies, contradictions and inaccuracies and, if adopted in this form, is likely to lead to misunderstandings, unnecessary debate, delays and challenges. The University is particularly concerned about:</p> <ul style="list-style-type: none"> <li>• the use of the terms 'academic' and 'ancillary' which, taken literally, would mean that every development proposed by the University would be caught by the second paragraph of Policy 13;</li> <li>• the use of the words 'in line with the increase in student numbers' when the Borough Council has no idea what this means, or how a calculation might be undertaken, and bearing in mind that there will be a considerable number of instances where there would not be (and could not be) any such resultant increase in student numbers;</li> <li>• the seemingly arbitrary use of thresholds;</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>the use of the words 'where appropriate' at the beginning of paragraph 3 of DCP13;</li> <li>paragraph 3 (i) which seems to imply that, for every additional student enrolled at the University, the University will need to provide an additional managed bed space; and</li> <li>Inconsistencies between DCPs 13, 14 and 15.</li> </ul>   |  |
| RN659<br>GOEM  | <p>DCP13/14 are not soundly based on evidence.</p> <p>Using the Science Park for student accommodation could seriously undermine economic potential and should be resisted.</p> <p>Requiring new managed student accommodation to be dispersed to areas with low concentrations of resident students appears to contradict (ii) &amp; (iii) to encourage more sustainable modes of travel.</p>  |  |
| RN712<br>Hepher Dixon on behalf of Loughborough Golf and Hotel Development | <p>Support. Paras 5.65 to 5.66 need to allow for development especially relating to sports research and education to ensure long term success of university and contribution to local economy.</p>  |  |
| RN742<br>Redrow Homes  | <p>Recognise key role of University and impact in terms of housing pressures. Redrow can help meet needs for student accommodation.</p>   |  |
| RN804<br>A Irving  | <p>The University is becoming over dominant. Constrain its size especially on issues such as housing provision. Students, in the main, are here for 20 weeks. Residents are here for 52.</p>  |  |
| RN806<br>A Kay   | <p>The issues of traffic, car-parking and transport are very important. The Council should make permission for University-related development conditional on the University adopting strong "Green Travel" policies.</p> <p>University-related development should be exemplary in terms of sustainability, especially with regard to energy. The University must adhere to the design principles in DCP 6.</p>  |  |
| RN820<br>Loughborough College  | <p>This policy is undemocratic and conflicts with paragraph 5.65. It indicates an intention to restrain trade and human rights in terms of the right of a person to choose where to live. It is unreasonable to impose through a planning control when the University cannot force students to live in Halls. Delete second paragraph.</p> <p>No definition of 'full-time education'. It leaves unanswered the question of part-time students who come to Loughborough for their education – including those who seek student accommodation as a refuge from domestic violence.</p> |  |
| RN817<br>T Birkinshaw  | <p>Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'</p> <p>Student housing in Loughborough should be reduced even further than those stated. No more student housing in centre of Loughborough.</p>  |  |
| RN820<br>J E Mutton<br>Loughborough College                                | <p>Considered undemocratic, unreasonable and a restraint on human rights and contradicts paragraph 5.65.</p> <p>Right for people to live where they choose – university cannot force students to live in halls of residence.</p> <p>Policy lacks definition of full-time students and part time students</p> <p>Leaves unanswered where local youngsters seek student accommodation as refuge from domestic violence.</p>   |  |
| RN824<br>National Trust  | <p>Supported.</p>   |  |
| RN903<br>Trevor Davies   | <p>University fees will mean less young people will be able to benefit from university education. So Loughborough University may stabilize and the number of employees remain constant or decrease.</p>   |  |
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| Respondents            | Summary of Comments   |  |
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| RN129<br>Prof R Bowman | <p>Conflict between housing needs and targets and student accommodation (paras 5.57 to 5.66)</p> <p>As student housing does not count towards housing figures the strategy (eg para 4.45) to build housing on sites between existing communities while maintaining the current student accommodation exclusion in the Town Centre is illogical, inconsistent and contradictory.</p> <p>The Borough Council should redraft the Student Accommodation SPG to ensure the town centre is included and prioritise proposals on town centre sites for housing to contribute towards housing targets before releasing land for inter community housing.</p>  |  |
| RN154<br>J R Cowell    | <p>More evidence required of need for extra student accommodation.</p>  |  |
| RN340<br>A Clift       | <p>Seeks to continue the current SPD which specifically permits development of dedicated student accommodation in the town centre locations by excluding the town centre from its provisions;</p> <p>As student housing is seen more profitable than low cost housing the exclusion of the town centre is and will continue to drive low cost housing from the town centre;</p> <p>Council is approving applications on town centre opportunity sites without the currently recommended 30% low cost provision, contrary to its own policy;</p> <p>As student housing does not count towards housing targets the strategy proposed to build on sites between existing communities to meet housing targets, while maintaining the current student accommodation town centre exclusion, is illogical, inconsistent and contradictory.</p> <p>Redraft SPD to:</p> <ul style="list-style-type: none"> <li>• Ensure Loughborough town centre is included in the SPD provisions;</li> <li>• Prioritise proposals on town centre sites for housing which contribute to housing targets before releasing land for inter-community housing.</li> </ul> <p>Add policy giving priority to affordable housing needs in the town and setting clear limits on the opportunities for student housing blocks.</p> |  |
| RN470<br>I White       | <p>Seeks to continue the current SPD which specifically permits development of dedicated student accommodation in the town centre locations by excluding the town centre from its provisions;</p> <p>As student housing is seen more profitable than low cost housing the exclusion of the town centre is and will continue to drive low cost housing from the town centre;</p> <p>Council is approving applications on town centre opportunity sites without the currently recommended 30% low cost provision, contrary to its own policy;</p> <p>As student housing does not count towards housing targets the strategy proposed to build on sites between existing communities to meet housing targets, while maintaining the current student accommodation town centre exclusion, is illogical, inconsistent and contradictory.</p> <p>Redraft SPD to:</p>  |  |

| Respondents  | Summary of Comments   |  |
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|  | <ul style="list-style-type: none"> <li>• Ensure Loughborough town centre is included in the SPD provisions;</li> <li>• Prioritise proposals on town centre sites for housing which contribute to housing targets before releasing land for inter-community housing.</li> </ul> <p>Add policy giving priority to affordable housing needs in the town and setting clear limits on the opportunities for student housing blocks.</p>  |  |
| RN477<br>P Moxon   | There needs to be better planning for the population not just more. Older people would like to move to a smaller house but they cannot due to students.   |  |
| RN517<br>Loughborough University<br><br>Agent: GVA Grimley LLP | <p>Inappropriate and unnecessary for policy to state that the University campus and the Science Park land will be the primary location for additional purpose built managed student accommodation. The Policy goes on to note that the Council will support the provision of additional managed accommodation within the town, when the location is right, and the Council's Student Housing SPD makes provision for this also. The Council has not quantified how many managed residencies the town is likely to be able to accommodate but, on the face of it, the amount could be substantial. To avoid confusion and misinterpretation, Policy 14 should simply offer policy support for the provision of additional managed residencies and cross refer to the policy framework provided by the Council's Student Housing SPD.</p> <p>The condition articulated in (i) is restrictive to the extent that it could be impossible to find student accommodation contractors prepared to engage in such provision: the financial risks could be unacceptable to them (and to the University).</p> |  |
| RN659<br>GOEM  | <p>DCP13/14 are not soundly based on evidence.</p> <p>Using the Science Park for student accommodation could seriously undermine economic potential and should be resisted.</p> <p>Requiring new managed student accommodation to be dispersed to areas with low concentrations of resident students appears to contradict (ii) &amp; (iii) to encourage more sustainable modes of travel.</p>  |  |
| RN744<br>S Mitchell  | <p>Need greater policy emphasis on affordable housing needs in Loughborough setting clear limits on opportunities for student only housing. Too many smaller terraced houses taken out as buy to let properties.</p> <p>Do not support DCP 14 indicating that supplementary student accommodation may be provided in the town centre.. This will drive away low cost housing opportunities.</p> <p>Urge redrafting of Student Accommodation SPD to prioritise proposals on town centre sites for general housing contributing to requirements.</p>  |  |
| RN788<br>S Bullman   | <p>Conflict of housing needs/targets and Student Accommodation, Sections 5.57 to 5.66 allude to the recently introduced student accommodation SPD. DCP 14 statement that supplementary accommodation may be provided in the town centre seeks to continue the current SPD which specifically permits the development of dedicated student accommodation in Town Centre locations by excluding the town centre from its provision.</p> <p>Policy makes a mockery of the term "Science Park". If it is to be a student village, then it should be termed so.</p>  |  |
| RN795<br>J Faulks<br>Normanton on Soar Parish Council          | <p>Policy does not go far enough to reduce the student housing and to acknowledge that the university is already too big for the town.</p> <p>Excessive use of houses in Loughborough by students – this housing stock only used part of the year, is untidy and badly maintained. It is destroying the quality of life for the Loughborough residents;</p> <p>Restrict development of the University but student accommodation should be progressively moved to the University campus.</p>   |  |
| RN806<br>A Kay   | <p>Issues of traffic, car-parking and transport are very important. The Council should make permission for University-related development conditional on the University adopting strong "Green Travel" policies.</p> <p>University-related development should be exemplary in terms of sustainability, especially with regard to energy. The University must adhere to the design principles in DCP 6.</p>  |  |

| Respondents             | Summary of Comments   |  |
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| RN810<br>N Morgan       | Disagree that further student accommodation is needed in town. There are already student bedrooms still unlet.  |  |
| RN815<br>R Parsons      | The University intend to have the majority of student living on campus in the medium term. This will release housing used for student accommodation in the town, especially around the Ashby Road area. Has this been factored into the local housing needs?  |  |
| RN817<br>T Birkinshaw   | Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'<br>Student housing in Loughborough should be reduced even further than those stated. No more student housing in centre of Loughborough.   |  |
| RN824<br>National Trust | Support.  |  |
| RN900<br>Gill           | Document does not adequately address excessive use of houses by students. They are only used for part of year, are untidy, badly maintained by landlords and are destroying quality of life for those that remain. Reduce student accommodation in the general housing stock so it can be returned to private ownership for residents and reduce the need for so many homes.  |  |
| RN901<br>K Canner       | Document does not adequately address destruction of the town centre by students accommodation. They are only used for part of year, are unkempt and decaying, unruly neighbours who are destroying the community in which we live. Reduce student accommodation in the general housing stock and put more students on campus. The houses can be returned to private ownership for residents and reduce the need for so many homes.  |  |
| RN906<br>R I Porter     | This appears contradictory to Student Housing in Loughborough SPD in terms of allowing student accommodation across the town centre. Suspect a hidden agenda - the brownfield option will be discarded after planning permission has been secured for the hospital, Leicester Road and Devonshire Square areas.   |  |
| RN1302<br>P A Shone     | <p>Seeks to continue the current SPD which specifically permits development of dedicated student accommodation in the town centre locations by excluding the town centre from its provisions;</p> <p>As student housing is seen more profitable than low cost housing the exclusion of the town centre is and will continue to drive low cost housing from the town centre;</p> <p>Council is approving applications on town centre opportunity sites without the currently recommended 30% low cost provision, contrary to its own policy;</p> <p>As student housing does not count towards housing targets the strategy proposed to build on sites between existing communities to meet housing targets, while maintaining the current student accommodation town centre exclusion, is illogical, inconsistent and contradictory.</p> <p>Redraft SPD to:</p> <ul style="list-style-type: none"> <li>• Ensure Loughborough town centre is included in the SPD provisions;</li> <li>• Prioritise proposals on town centre sites for housing which contribute to housing targets before releasing land for inter-community housing.</li> </ul> <p>Add policy giving priority to affordable housing needs in the town and setting clear limits on the opportunities for student housing blocks.</p> |  |

| Respondents                             | Summary of Comments  |  |
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| RN07<br>E Goodyer                       | Enhance recreation and amenity by:<br>-Designation of the River Soar as a linear park<br>-Designation of Garendon Park as a Country Park<br>-Expand National Forest to compensate for loss of agricultural land west of Charnwood.<br>-Create series of footpaths and trails to links above three parks.   |  |
| RN59<br>K R Senior                      | No Country park on Garendon land.  |  |
| RN95<br>Great Central Railway<br>PLC    | Add reference to Great Central Railway. GCR does not figure in the plan, on the map or in the text. It is an asset: <ul style="list-style-type: none"> <li>• One of leading tourist attractions in Charnwood;</li> <li>• GCR plans to develop attractions along the line including an education facility probably at Quorn.</li> <li>• GCR have put to the Council its views on establishing a heritage quarter around Loughborough Central station to enhance this area and bring more visitors into the town using the railway as a focus.</li> </ul>  |  |
| RN197<br>R W Hill                       | Para 5.74 – need non car access to Bradgate Park, Big Meadow, Swithland Wood etc.  |  |
| RN339<br>CPRE (Charnwood)               | Country parks should retain natural appearance, without alien features such as public art. Concern over football clubs are targeted in inappropriate locations in the countryside.   |  |
| RN369<br>A Maddocks                     | Ad hoc planning decisions over the years has resulted in the loss historically important buildings   |  |
| RN463<br>Sileby Town Football<br>Club   | <p>The football club's appeal, against refusal of planning permission, for a new ground at Seagrave Road, Sileby has been turned down. As in each of our planning applications the land off Lanes Close, that is allocated in the Local Plan as open space provision, was mentioned by the Inspector as an alternative.</p> <p>This site was to be implemented by the building of a housing development that was deleted from the Local Plan leaving a 'ghost' site for recreational land still on the Plan. In the last few years hundreds of new houses have been built in Sileby but no more provision of suitable recreational land. The retention of this site on the Local Plan prevents anything being done about issues of lack of open space provision in Sileby. How, when or if is the Council going to implement this site?</p> <p>The lack of recreational space in Sileby needs to be dealt with urgently and the population is increasing with every tiny planning permission for dwellings. Also a greater percentage of the new housing is 'affordable housing' – smaller housing and flats. These are mainly being bought up by young people who need recreation and leisure facilities for themselves and their young families. The lack of recreation land in Sileby will not go away. The site at Lanes Close is of no practical use to anyone and is preventing Sileby Town Football Club from finding suitable land for a new ground.</p> |  |
| RN464<br>The National Forest<br>Company | This policy should also seek to secure enhanced public access to link countryside sites within Charnwood Forest, through new trails and improvements to Rights of Way.   |  |
| RN517<br>Loughborough<br>University     | If DCP 13 is retained in its current form it will be necessary for the University to provide additional managed student residences in tandem with any new recreational facilities. This will almost certainly render the cost of providing additional recreational facilities unbearable. DCP13 is likely to have a range of adverse consequences at odds with the Supporting text and DCP 15 references to the University as being world-renowned as a centre of supporting excellence, recognising the importance of   |  |

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| Agent: GVA Grimley LLP   | clustering sporting excellence in Loughborough and It going on to help maximise the benefits arising from the Olympic Games. The Policy itself says that the Council will negotiate the provision of expanded recreational facilities at Loughborough University associated with its role as a centre of sporting excellence.  |  |
| RN615<br>R E Davies on behalf of St Michael and All Angels, Thurmaston             | 5.75 Thurmaston has water and river areas suitable for leisure/training related to the 2012 London Olympics.<br>5.76 Need for full access to Watermead Park from Thurmaston<br>5.79 iv) District park needed for youth and leisure.<br>Need a gateway to Watermead park lakes and walks accessible to people of all abilities on foot and by cycle paths. Local groups are developing initiatives to attract local people and visitors into area around Memorial hall/ Old School and church close to the riverside walks.   |  |
| RN619<br>Anstey Parish Council   | Support.   |  |
| RN659<br>GOEM  | Monitoring standards in the policy would give greater certainty and a means to derive targets for delivery and also greatly assist implementation of DCP11.  |  |
| RN662<br>English Heritage  | i) Wish to discuss in more detail to determine whether a country park is the best way to secure long term management of Garendon Park.   |  |
| RN712<br>Hepher Dixon on behalf of Loughborough Golf and Hotel Development         | Para 5.78 support policy to direct growth to locations supporting university secure regionally significant role as centre of excellence for education, sport, sports science, research. However locations will need to be varied and university may be opportunistic to work with landowners/ developers to secure objectives.<br>Para 5.79 support policy and agree need to secure recreational facilities in the Borough. Council should support long term needs of university as centre of sporting excellence; and make provision for expanding recreational facilities to meet demands. |  |
| RN720<br>J Sutherland  | Support.   |  |
| RN742<br>Redrow Homes  | Delivery of a new District Park at east Thurmaston/ North of Hamilton needs to be debated through LDF process.   |  |
| RN817<br>T Birkinshaw  | Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'.<br>Add District Park and local amenities to combat deficiencies in SW Loughborough and villages.  |  |
| RN822<br>F Hutchinson<br>Woodland Trust  | Draft Core Policy 15: Leisure and Recreation: The Woodland Trust would like to see the reference to improving leisure and recreation facilities within District strengthened. We believe there is a deficit of open and green space in the District with particular reference to accessible wooded green space.  |  |
| RN824<br>National Trust  | Support.   |  |
| RN918<br>Wilson Bowden and David Wilson Homes<br><br>Agent: Pegasus Planning Group | There is scope to provide a new district park to east of Thurmaston/ north Hamilton, but this could only be brought forward as part of a comprehensive development package.  |  |
| RN1293<br>Loughborough Gospel Hall Trust   | Emphasise the role of moral and spiritual support as a basic human need as opposed to leisure and recreation.  |  |

| Respondents         | Summary of Comments |
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| Agent: J & J Design |                     |

Draft Core Policy 16 – Managing Environmental Resources

| Respondents  | Summary of Comments   |
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| RN15<br>M Birkinshaw   | Greater emphasis on renewable energy, especially solar, thermal, micro wind turbines.<br>50% of housing after 2010 should incorporate solar or wind energy<br>If Loughborough takes most development must be used to improve the town and done to high standards.   |
| RN142<br>E E Jones   | Require new housing on greenfield sites to use sustainable design and construction, sustainable energy etc.   |
| RN143<br>R W Jones   | Particularly support re sustainable energy  |
| RN339<br>CPRE (Charnwood)                                      | Change wording to 'Planning permission will <u>only</u> be granted'.  |
| RN458<br>FKI Plc<br><br>Agent: NAI Fuller Peiser               | Support in principle but request an amendment:<br><br><i>'Planning permission will be granted for development which manages the use and maintains or enhances quality of environmental resources. <b>Where appropriate</b>, development proposals will:</i><br><br><i>i) minimise the emissions of pollutants including air, lighting and noise...</i><br><br>Recognise that the management of environmental resources should be promoted in new development but the current wording of policy is overly restrictive as the criteria set out would not be appropriate to all new development. For example, it seems unrealistic and inappropriate to require an extension to the existing factory and office premises at the FKI site to 'minimise the loss of best and most versatile agricultural land and incorporate re-use of soil resources'. |
| RN460<br>Environment Agency                                    | Not acceptable for development to <i>minimise</i> flooding (ii). Flood risk needs to be assessed and managed so as not to cause a development, nor others, to flood. Opportunities should be taken to reduce flood risk where possible, and may enhance the development potential of other sites.<br>Impact on water quality is better associated with emissions and pollutants in i) rather than being associated with flood risk.   |
| RN464<br>The National Forest Company                           | The intention to promote Combined Heat and Power (CHP) initiatives, as part of the proposed western expansion of Loughborough, (para 5.88) and to develop innovative approaches to energy efficient design (para 5.93) are supported. Reference could also be made to the potential for wood fuel initiatives, linked with increased woodland management activity in The National Forest.   |
| RN517<br>Loughborough University<br><br>Agent: GVA Grimley LLP | Generally supportive but the University considers that the wording of the final paragraph of the policy is too specific. DCP16 should be used to encourage developers to investigate and utilise different ways of limiting carbon emissions from new buildings. The proposal is restrictive and removes scope for innovation.  |
| RN520  | No justification to automatically require all developments to incorporate renewable energy technology and energy saving   |

| Respondents                                  | Summary of Comments   |  |
|--|---|--|
| House Builders Federation                    | <p>technologies:</p> <ul style="list-style-type: none"> <li>• It would make development sites unviable;</li> <li>• Totally unclear what technologies are envisaged and who will be responsible for the long term care and maintenance of such facilities;</li> <li>• Policy requirement will not be implementable and should be deleted as fails test of soundness (viii);</li> <li>• Contrary to PPS1 and PPS12 that state 'planning policies should not replicate, cut across or detrimentally affect matters within the scope of other legislative requirements...'</li> <li>• Dealt with by Part M of Building Regulations that are regularly updated;</li> <li>• BREEAM Eco Homes standards are being abolished and replaced by the voluntary code for sustainable buildings.</li> </ul>   |  |
| RN619<br>Anstey Parish Council               | Strong support.   |  |
| RN659<br>GOEM                                | <p>DCP16 proposal for a combined heat and power plant could be relevant if this uses renewable fuel. A separate policy for the urban extension of Loughborough could incorporate promotion of such a plant.</p> <p>Too onerous to require renewable energy installations in all development. Concern at lack of proposals for significant renewable energy generating capacity (RSS Policy 41)</p> <p>(v) a &amp; b cover matters ultra vires to planning. The CS should not duplicate or replace building control standards. (v)c requirement for all development proposals to incorporate renewable energy may be unduly onerous.</p> <p>(ii) appears to overlap with DCP 2(xii), DCP 3(xvii) and DCP 6(xiv). Better to merge these matters together in a single policy.</p> <p>(iv) may be a matter for the Minerals Development Framework.</p> <p>(v) and DCP 6(xii-xiv) may be better merged together in a single policy.</p> <p>The target to reduce predicted CO2 emissions by 10% is potentially ambiguous. There may be better means than the installation of renewable energy installation e.g. energy efficiency, carbon fixing through tree planting etc.</p> |  |
| RN720<br>J Sutherland                        | Strongly support.   |  |
| RN741<br>GVA Grimley on behalf of Jelson Ltd | Too prescriptive and onerous re energy efficiency issues. Need to examine other ways of securing these benefits. Need to delete or reduce these requirements and approach in a graduated manner.  |  |
| RN742<br>Redrow Homes                        | Support policy in principle. Development of design and construction technologies merits wider debate.   |  |
| RN788<br>S Bullman                           | <p>Welcome in principle, but needs redrafting to be effective:</p> <ul style="list-style-type: none"> <li>• Current wording does not preclude development that does not demonstrate the properties outlined. Those instances are left unclear, so the council is open to appeal. Invert the logic of the whole paragraph, ie, "Planning permission will not be granted for development that does not demonstrate that it manages the use and maintains or enhances. Development proposals will need to demonstrate that they etc.</li> <li>• i)-v), some wording needs to be altered to be clear and effective;</li> <li>• i), iii), v)b) absolute words such as 'minimise' should be avoided. It would be better to say 'uses all currently available to minimise';</li> <li>• v)a) quoting a 10% reduction implies a baseline that is not explicitly specified. Should read 'reduce predicted CO2 emissions by at least 10% as defined eg in the Government Energy White Paper 2003.</li> </ul>   |  |

| Respondents  | Summary of Comments  |  |
|--|--|--|
| RN794<br>N Browne  | I would like to see grater emphasis on Green solutions including solar panels photovoltaic cells and wind turbines built into the design of new housing and business developments.   |  |
| RN795<br>J Faulks<br>Normanton on Soar<br>Parish Council                                 | Seek Environment Agency support to ensure no development along the eastern side of the A6 which would increase the potential for flooding.   |  |
| RN796<br>T Stott   | Wording 'planning permission will be granted'  |  |
| RN817<br>T Birkinshaw  | Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'<br>Concerns about 'planning permission will not be granted'. Regardless of other factors? Rephrase as 'planning permission will not be granted unless developments manage...'<br>v) c) 10% too conservative; aim for higher (25% - 40%) after 2011. Specifically mention solar thermal for new build – cheap (-2K) and simple. Also 'micro-wind, up and coming. CHP may be OK if 'biofuel'.  |  |
| RN824<br>National Trust  | Generally support but in iii) more specific consideration should be given to soil <u>quality</u> – for example in accordance with DEFRA's Soil Action Plan, May 2004; and to bringing forward the cleaning up of contaminated sites.   |  |
| RN907<br>William Davis Ltd &<br>Persimmon PLC<br><br>Agent: Andrew<br>Martin Associates  | Requirement to 'promote the development of a Combined Heat and Power Scheme (CHP) as part of the proposed western expansion of Loughborough':<br><br><ul style="list-style-type: none"> <li>• Is over prescriptive and does not take account of emerging technologies that may replace CHP systems;</li> <li>• wording is overly vague in considering how and on what scale such a scheme might be implemented.</li> </ul> Delete reference to CHP as point (v(b)) provides a sufficient 'catch all' wording to cover energy efficient development.                  |  |
| RN918<br>Wilson Bowden and<br>David Wilson Homes<br><br>Agent: Pegasus<br>Planning Group | Support energy efficiency measures but the concern that proposal for Combined Heat and Power scheme may not be the correct solution for the West of Loughborough proposal.   |  |
| RN1347<br>Charnwood Liberal<br>Democrat Councillor<br>Group                              | Support intention to encourage use of innovative approaches to energy efficient design and the use of renewable energy production;<br>Oppose a passive policy – as energy becomes more expensive and scarce and traditional generation methods cause damage to the environment business as usual is not an option;<br>Include a more positive approach to sustainable energy production, drawing on the 'micro generation and sustainable energy bill for guidance;<br>Future development will also be constrained by the availability of a guaranteed water supply. |  |

Draft Core Policy 17 – Managing Travel Demand and Widening Transport Choice

| Respondents | Summary of Comments   |  |
|-------------|---|--|
| RN06        | Further action on lift sharing schemes (as at Nottingham East Midlands Airport) and car clubs |  |

| Respondents  | Summary of Comments   |  |
|--|---|--|
| D Street   | Improve pedestrian routes across Loughborough, for example from University to rail station.   |  |
| RN34<br>B Tallon   | Disabled parking facilities are being pushed further away from the shopping facilities due to increasing pedestrianisation. At the same time there are increasing restrictions and controls on those who can obtain 'Blue' disabled parking badges. On this basis if this continues then disabled parking facilities will be unnecessary as disabled people will have to park further away and so it could be argued that such people no longer need disabled parking badges, |  |
| RN37<br>N L Sharpe (and on behalf of R Truslove, Ms A Sharp)   | Improve access to new developments.   |  |
| RN95<br>Great Central Railway PLC                              | Great Central Railway is a transport facility in the Borough. The Railway expect to be part of a scheme to move school children or shoppers, via a park and ride, into Loughborough before 2021. Great Central Railway and Great Central Railway (N) are attempting to bridge the gap to create a transport corridor to link villages towards Nottingham. There is also a notion to extend back to Leicester.   |  |
| RN197<br>R W Hill  | (i) sounds good but not followed at present eg town centre; (iii) is A512/ A6 link road needed?   |  |
| RN339<br>CPRE (Charnwood)                                      | Support, but cannot see how (vi) can be achieved.   |  |
| RN456<br>Leicestershire County Council                         | <p>The policy is generally consistent with the thrust of the Structure Plan, and is therefore supported. Detailed comments of the Director of Highways, Transportation and Waste Management are as follows:</p> <p>The County Council will need to be assured that polices on development and the transport system are consistent with strategic guidance when the General Development Control DPD is published for consultation.</p>   |  |
| RN464<br>The National Forest Company                           | High priority should be placed upon improvements to public transport, cycling and walking. There is a need to improve links from urban centres to enable better access to recreational sites within Charnwood Forest.   |  |
| RN481<br>J Thompson  | Better public transport and cycle routes;<br>No more pressure on existing roads.  |  |
| RN517<br>Loughborough University<br><br>Agent: GVA Grimley LLP | The University is pleased to see that the Borough Council is keen to grapple with the issue of travel and demand management in a measured way.  |  |
| RN520<br>House Builders Federation                             | Policy text reads like an aspirational wish list rather than a planning policy. It is not clear how some of the matters mentioned will be implemented.  |  |
| RN619<br>Anstey Parish Council                                 | Strong support.   |  |
| RN620<br>Del Rosa Developments Ltd                             | 5.117, 5.102, 5.54 Rural development needed to reduce car use and provide local employment.   |  |
| RN659  | Proposals for the Inner Relief Road (Vision), A512/ A6 link road (Key Diagram & DCP 2 (xi)) and additional short stay parking in  |  |

| Respondents                                     | Summary of Comments   |  |
|---|---|--|
| GOEM  | Loughborough town centre (DCP18(x)) do not appear to be in the Local Transport Plan. All are likely to increase use and dependency on the car contrary to CS objectives and DCP17. Substantial supporting evidence needed to support inclusion. No target in policy related to accessibility indicator in the Monitoring Framework. No proposed indicators or targets in relation to managing travel demand.  |  |
| RN662<br>English Heritage                       | Paras 3.6 & 5.103 support removal of traffic from High St and Swan St but consider there may be a case to allow access by buses to encourage their use and avoid congestion on the inner relief road. Have reservations about IRR as solution to traffic problems but are pleased County Council have engaged consultation to look at design issues about integration of road into historic streets.  |  |
| RN720<br>J Sutherland                           | Strongly support.   |  |
| RN742<br>Redrow Homes                           | Acknowledge need to address transport/ traffic issues and focus development in most sustainable locations. Part vi) seems to go well beyond remit of planning.  |  |
| RN806<br>A Kay                                  | Include more explicit reference to improvements to walking and cycling infrastructure or least priority being given to these modes in all developments.   |  |
| RN808<br>D Evans                                | There are some sound principles of sustainable development but these are translated into planning options through conventional approaches. In particular the transport aims are not compatible with specific locational strategies with new road infrastructure which undermines sustainability.  |  |
| RN815<br>R Parsons                              | Cities such as Sheffield and Nottingham have well thought out transport policies. We are planning that the majority of people will still be needing to use their cars because public transport is not convenient or available. Encourage local transport.   |  |
| RN816<br>S Cuff<br>Nanpantan Residents' Network | Why is there no mention of the severe congestion on Epinal Way?   |  |
| RN817<br>T Birkinshaw                           | <p>Concerned that 'sustainable development' is being misused when it should be 'least unsustainable'<br/>Need developments that are designed to make walking and cycling easier (than driving)</p> <ul style="list-style-type: none"> <li>• Public transport links need to be in place (or at least their frequency and destination known) as developments are opened, not as an after-thought when travel patterns have been established.</li> <li>• Similarly shopping, schooling and other facilities need to be in place before significant (&lt; 10%?) of development is opened so people know what will be available and don't need to look elsewhere.</li> <li>• New developments need to be relatively self-contained.</li> <li>• Need to discourage developers from advertising (Loughborough) housing as dormitory for commuting to Derby. Leics etc (as for Park Grange).</li> </ul> |  |
| RN820<br>J E Mutton<br>Loughborough College     | 75% of Loughborough College students live outside the LE11 postal district. The continuing failure to provide adequate public transport and/or adequate public car parks, or even a park and ride scheme damages our business, reduces the opportunities for young people to learn (para 2.26) and results in less wealth being brought to the town.  |  |
| RN824<br>National Trust                         | Support.  |  |
| RN897<br>David Mear                             | <ul style="list-style-type: none"> <li>• Seem to be building near roads and not close to rail or potential tram routes.</li> <li>• More bus lanes are needed to give bus priority and speed of travel.</li> <li>• Need better walking access to bus routes such as through paths or jetties to reduce distances to bus stops (with better bus shelters).</li> </ul>   |  |

| Respondents                | Summary of Comments  |
|----------------------------|--|
| RN917<br>Mr & Mrs Westwood | <ul style="list-style-type: none"> <li>Better bus/tram links between the railway station and the new developments/university and hospital.</li> <li>1 parking space for 1 dwelling being perceived as short sighted.</li> <li>Public transport needs to be dramatically improved before people leave their cars behind.</li> </ul> |

Draft Core Policy 18 – Town Centres

| Respondents   | Summary of Comments   |
|---|---|
| RN95<br>Great Central Railway<br>PLC  | Add reference to Great Central Railway.   |
| RN335<br>P J Thorpe   | <ul style="list-style-type: none"> <li>Loughborough needs a new bus station to allow easy interchange between services.</li> <li>Question raised over the proceeds of Biggin Street Bus Station being used to fund bus improvements</li> <li>Question raised about 'quality bus facilities' within the town and consultants recommendations.</li> <li>Concern over the design quality of recent development and that these should be remedied in the future.</li> </ul>   |
| RN340<br>A Clift  | <p>Certain parts of Loughborough have become unbalanced and unsustainable communities due to excessive numbers of student beds in private and purpose built student housing market. Must not repeat this mistake in current plans for the town centre:<br/>Using the town centre to maximise general housing provision increases sense of security – people being around at night makes a safer place for all;<br/>Gives best access to public transport and employment opportunities;<br/>Restrict housing provision for transient residents – many students are away for several weeks of the year resulting in an air of abandonment in evenings and vacations and attendant security risks.</p>   |
| RN456<br>Leicestershire County<br>Council                                     | <p>Policy should contain a specific reference to the role of office development within the town centre, and clear criteria to direct office development to the town centre in line with the sequential approach.</p> <p>The existing network of libraries and mobile library service within Charnwood is of significance and should be taken into account particularly in relation to Draft Core Policy 18. Town Centres. There are medium sized libraries at the existing District Centres of Birstall, Shepshed and Syston, with smaller community libraries at Anstey, Barrow upon Soar and Thurmaston. Gorse Covert and Shelthorpe are served by Loughborough's urban mobile library service.</p> |
| RN462<br>Sainsbury's<br>Supermarkets Ltd<br><br>Agent: Indigo Planning<br>Ltd | Support the settlement hierarchy subject to clarification that the Sainsbury's store will continue to be formally recognised as an integral element of the defined Loughborough Town Centre. This reflects the positive contribution that the store makes to the vitality and viability of the centre.  |
| RN464<br>The National Forest<br>Company                                       | Town Centres – Noted that a masterplan is being commissioned for Loughborough town centre. The potential of Loughborough to become a tourism gateway for the Borough (and The National Forest) should be addressed as part of this study and reflected in Draft Core Policy 18.   |
| RN470<br>I White  | Certain parts of Loughborough have become unbalanced and unsustainable communities due to excessive numbers of student beds in private and purpose built student housing market. Must not repeat this mistake in current plans for the town centre:   |

| Respondents  | Summary of Comments   |  |
|--|---|--|
|  | <ul style="list-style-type: none"> <li>• Using the town centre to maximise general housing provision increases sense of security – people being around at night makes a safer place for all;</li> <li>• Gives best access to public transport and employment opportunities;</li> <li>• Restrict housing provision for transient residents – many students are away for several weeks of the year resulting in an air of abandonment in evenings and vacations and attendant security risks.</li> </ul>  |  |
| RN517<br>Loughborough University<br><br>Agent: GVA Grimley LLP         | The University is pleased to see that provision is made, in broad terms, for the enhancement of Loughborough town centre (although the Core Strategy should probably go further in this respect, to assist with economic growth).   |  |
| RN608<br>J M Neal  | Shopping available in Loughborough, Shepshed and Coalville but nowhere in east until Melton Mowbray.  |  |
| RN615<br>R E Davies on behalf of St Michael and All Angels, Thurmaston | Thurmaston village centre affected by Asda and retail park  |  |
| RN619<br>Anstey Parish Council   | Support.  |  |
| RN659<br>GOEM  | <ul style="list-style-type: none"> <li>• Could include further crime reduction proposals and targets.</li> <li>• The policy proposes to maintain or enhance Local Centres, but does not define them either by location or criteria.</li> <li>• (iii) might best be merged with (iv).</li> <li>• No locations are identified as appropriate for the implementation of (v), suggesting retail needs of the area over the period of the CS are not understood.</li> <li>• Assume that the integration of planning and licensing controls referred to in (vii) will ensure planning controls do not duplicate the role of the licensing act.</li> <li>• No targets are proposed despite references to Town Centre Management and the guidance in PPS6 on measures of the health of town centres. The monitoring framework is limited to the % of commercial development in town centres.</li> </ul> |  |
| RN720<br>J Sutherland  | Support.  |  |
| RN798<br>Peacock & Smith on behalf of Wm Morrison Supermarkets Ltd     | Whilst paragraph 5.124 asserts that there is 'limited' need for additional retail floorspace over the period to 2016, there is no indication of what the actual need for food and non-food retail floorspace is.  |  |
| RN802<br>T Higgins   | To increase the attractiveness of Loughborough for shopping and leisure must welcome the car and make car parking convenient and secure.  |  |
| RN810<br>N Morgan  | Loughborough Town Centre needs a committed town centre management team to attract more retailers. Pedestrianisation is not a magic answer to attracting more shoppers.  |  |
| RN824  | As part of this Policy the heritage/tourism value of centres should be recognised, protected and enhanced.  |  |

| Respondents  | Summary of Comments   |
|--|---|
| National Trust<br>RN906<br>RI Porter                                   | Clarify the situation in terms of the willingness of the Council to use CPO to secure sites. The Wharf fitted the bill for a CPO and the application turned into a farce.   |
| RN1293<br>Loughborough Gospel<br>Hall Trust<br><br>Agent: J & J Design | Town centres are not the only places where the social needs of communities can be met. Many communities feel the need for local community services and centres close to the communities, in out-of-town centre locations.   |
| RN1302<br>P A Shone  | <p>Planning decisions give less weight to the need for a safe, diverse, sustainable and socially inclusive town centre than the issues of economic viability. Development is driven by the lure of the student purse in prioritising exclusive student accommodation and food and entertainment venues without sufficient emphasis of the social and environmental well being of all citizens. Whilst recognising the importance of economic, social and environmental aspects this imbalance should be robustly addressed.</p> <p>Certain parts of Loughborough have become unbalanced and unsustainable communities due to excessive numbers of student beds in private and purpose built student housing market. Must not repeat this mistake in current plans for the town centre:</p> <ul style="list-style-type: none"> <li>• Using the town centre to maximise general housing provision increases sense of security – people being around at night makes a safer place for all;</li> <li>• Gives best access to public transport and employment opportunities;</li> <li>• Restrict housing provision for transient residents – many students are away for several weeks of the year resulting in an air of abandonment in evenings and vacations and attendant security risks.</li> </ul> |

Draft Core Policy 19 – Built Heritage

| Respondents                    | Summary of Comments  |
|--------------------------------|--|
| RN197<br>R W Hill              | (ix) Reduces access to town centre by bus.   |
| RN339<br>CPRE (Charnwood)      | Welcome policy.  |
| RN619<br>Anstey Parish Council | Strong support.  |
| RN659<br>GOEM                  | Despite the monitoring framework indicator of buildings at risk, the policy does not include any targets.  |
| RN662<br>English Heritage      | <p>Welcome policy and happy to advise on policies for inclusion the the Development Control Policies DPD. Suggest amended wording:</p> <p style="text-align: center;">“The built heritage of the Borough will be <i>preserved</i> and enhanced... conservation areas, <i>scheduled</i> monuments and <i>other</i> archaeological sites.”</p> <p>The national at risk register only includes 3 entries, not 50 as stated in para 5.13 as it only covers Grade 1 and 11* structures.</p> |

| Respondents             | Summary of Comments   |  |
|-------------------------|---|--|
|                         | <p>The higher figure must cover Charnwood's own register and include Grade 11.</p> <p>Monitoring &amp; Information The indicator for CP 19 should be amended to read:</p> <p style="padding-left: 40px;">"Numbers of designated historic assets at risk from development"</p> <p>Risk should cover both direct and indirect (eg setting) impacts</p> <p>Paras 2.5, 3.2 xvi) and 5.129: should refer to 4 historic parks and gardens - Bradgate Park, Garendon Park, Prestwold Hall, and Whatton House ( all Grade 11)</p> |  |
| RN720<br>J Sutherland   | Strongly support.   |  |
| RN824<br>National Trust | Policy should be supplemented as follows: '...ancient monuments and archaeological sites, <del>and</del> historic parks and gardens, <u>and the settings of these designated features</u> '. Settings are specifically referred to in primary legislation, PPG15 and PPG16, Specific reference to their importance in RSS Policies 27 and 31.   |  |
|                         |   |  |

Draft Core Policy 20 – Biodiversity

| Respondents                             | Summary of Comments   |  |
|---|---|--|
| RN339<br>CPRE (Charnwood)               | Wish to see same emphasis on this aspect as is given to economic and social aspects.  |  |
| RN464<br>The National Forest Company    | Support the approach towards biodiversity and DCP 20.   |  |
| RN619<br>Anstey Parish Council          | Strong support.   |  |
| RN659<br>GOEM                           | No specific actions are identified flowing from the BAP with a wealth of targets that could inform this policy, particularly in relation to the creation of semi-natural woodland and heath.                                  |  |
| RN720<br>J Sutherland                   | Strongly support.   |  |
| RN822<br>F Hutchinson<br>Woodland Trust | Support and welcome the strong stance on biodiversity protection and the Council's foresight to include biodiversity enhancement as part of the Policy. Strongly support the reference to the protection of ancient woodland. |  |
|   |   |  |