Charnwood Borough Council

DRAFT CHARNWOOD LOCAL PLAN 2019-36

STATEMENT OF CONSULTATION



March 2020

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Background

Charnwood Borough Council published the Draft Charnwood Local Plan 2019-36 and an accompanying Interim Sustainability Appraisal as part of the process it is following to prepare a new local plan. The new local plan, once adopted, will form part of the development plan for the Borough and replace the Charnwood Local Plan Core Strategy (2015) and the saved policies from the Borough of Charnwood Local Plan (2004).

The Council undertook two earlier consultations to help it prepare the draft plan, the first on the scope of the local plan in July 2016 and the second on the key issues and options in April 2018, when the Council published a discussion paper titled 'Towards a Local Plan for Charnwood'. The draft plan sets out the Council's preferred options for a development strategy and planning policies which have been developed taking into account the following:

- the Government's requirements as set out in the National Planning Policy Framework (NPPF)
- the Council's local priorities set out in its Corporate Plan and the local plan vision
- the evidence that has been prepared to understand the roles of different settlements, what land is available for development, constraints to development and the options for delivering homes and jobs
- the results of the earlier consultations and an options appraisal process.

Consultation Process

The consultation lasted for six weeks, starting on 4th November 2019 and ending on 16th December 2019. A letter/email was sent to the approximately 1,330 organisations and individuals that are on the local plan consultation database, which includes statutory consultees, parish and town councils, developers and planning agents, members of the public and local groups, to inform them of the consultation and invite their participation. A list of the organisations that were consulted in this way is set out in the appendix to this statement. An email alert was also sent to approximately 350 people who have registered to receive updates on the development of the local plan.

In order to seek as broad a range of responses to the consultation as possible, the Council also sought to publicise it in the following ways:

- the Council's communications team publicised the consultation, and information about how to respond to it, through the Council's website, social media (including paid for advertising), press releases which were picked up by several local newspapers and other publications, to the 2,700 subscribers to the Charnwood Now email alert and to members of the Virtual Citizens' Panel
- posters were sent to libraries, parish/town councils and community centres for them to display on their noticeboards

- copies of the draft plan were made available at libraries, the Borough Council's offices and the County Council's offices
- information about the local plan and the consultation was included in the Charnwood News magazine which is distributed to every household in the Borough
- information boards were displayed at three venues over a period of six weeks: the Borough Council offices in Loughborough, the Glenmore Centre in Shepshed and Syston Community Centre
- three consultation roadshow events were held, in Loughborough, Shepshed and Syston, at which officers were present to answer questions regarding the proposals in the draft plan and provide help with how to respond to the consultation
- officers attended a number of additional events at the request of parish councils to provide information about the draft plan and answer questions.

The Council is committed to involving a wide range of individuals and organisations in its planning consultations, including hard to reach groups, and to using a wide range of consultation techniques in seeking to engage with people who may not otherwise respond to planning consultations. The Council sought to overcome some of the barriers to people participating in the consultation by:

- expanding the consultation database to include a wider range of voluntary sector organisations
- contacting organisations representing hard-to-reach groups and offering assistance in enabling them and the people they represent to respond to the consultation
- producing a summary version of the draft local plan which was 12 pages long rather than the 132 pages of the complete draft plan
- enabling people to respond to the consultation in a number of different ways, including a flier with four key questions to answer which was sent to schools and voluntary sector organisations.

Number of Responses

Around 100 people attended the three roadshow events. A record was kept of the comments that were made at each of the events and a summary of the key issues from each event was prepared.

In total 434 people and organisations responded formally to the consultation, making approximately 3,500 separate comments containing around half a million words. The table below shows that responses were received from a range of sources including members of the public (64% of the total), planning promoters and developers, and various organisations and bodies including residents groups and other local authorities. Of these, 94 were submitted using the online consultation portal, 279 by email and 61 by letter.

The following table provides a breakdown of the responses by source and method of submission.

Draft Local Plan Consultation Respondents					
	Total	%	Online	Email	Post
Members of the Public	276	64	79	138	59
Developers/Promoters	75	17	2	73	0
Organisations	35	8	7	26	2
Parish Councils	18	4	2	16	0
Borough and County Councillors	12	3	3	9	0
Neighbouring Councils	11	3	1	10	0
Residents Groups	5	1	0	5	0
Internal Borough Council	2	<1	0	2	0
Total	434	100	94	279	61

Nine of these organisations and individuals submitted their responses in the form of the fliers with key questions and 47 completed fliers were received in total. Of these 22 were submitted from school students and 18 via voluntary sector organisations, which has broadened the range of people who were able to take part in the consultation.

Summary of Responses

The responses to the consultation can be viewed in full at the end of this introduction along with officer responses to them. Several issues and questions have emerged from analysing the responses. These are set out below and will be addressed by the Council in the preparation of the next draft of the local plan.

Engagement and the Duty to Co-operate

Many respondents highlight the need for greater co-operation with neighbouring local authorities, in particular Leicester City Council, to better understand the growth pressures across the sub-region, and to agree how to meet collective needs through a Statement of Common Ground.

Others requested further explanation of the relationship between neighbourhood plans and the new local plan, noting that there should be a clearer account of how the content in neighbourhood plans has been taken into account in producing the draft plan.

Several statutory bodies and infrastructure providers request closer collaboration with the Council to improve understanding of capacity issues and demand pressures, and to improve the Council's assessment of specific sites.

Vision and Objectives

In response to the vision and objectives, respondents suggest that there needs to be better integration of the policy areas covered by the Local Plan to achieve genuine sustainable development. They also suggest that the authority needs to be more ambitious in relation to climate change, sustainable transport, design, health and provision of green spaces. Others suggest that there needs to be greater realism regarding what can be achieved.

Respondents highlight a lack of vision for Service Centres and Other Settlements and a lack of explanation of the International Gateway and how this fits with the aim to protect the National and Charnwood Forest. The need to protect community identity is supported.

Respondents sought clarity on how the Leicester and Leicestershire Strategic Growth Plan has influenced the aims of the plan, with some noting that it is a nonstatutory document and therefore should only have moderate influence; whereas others highlight it should be a fundamental starting point for discussion on growth and investment.

Scale of Development

Respondents question whether the Council has determined the appropriate scale of housing and economic growth for Charnwood, and whether the Council has appropriately considered the implication of Leicester City's un-met housing need.

It is suggested by some respondents that the scale of housing planned is insufficient and that a larger buffer is needed. Similarly, it is argued that there is insufficient flexibility in the proposed scale of growth, and it will not secure a five-year supply of deliverable sites in the context of slow delivery of the SUEs. Respondents also suggest that the proposed scale of development will fail to meet affordable housing needs and not support economic growth.

Others have stated that the low growth scenario is the correct approach, and that this will deliver sustainable growth that minimises impacts on infrastructure and the environment, and reduces the negative impacts of climate change.

Development Strategy

The position of some settlements in the settlement hierarchy is questioned by some respondents. In terms of the distribution of development, there are suggestions of unfairness and that the scale of development in some areas is out of proportion with the size of the settlement or the infrastructure available to support development. A new settlement has been suggested as an alternative.

Some respondents suggest more development should be directed towards Loughborough and Shepshed; whereas others suggest more development should be directed to Service Centres, Other Settlements, and small villages and hamlets. It is highlighted that very little development is proposed in the north-east of the Borough.

Overall, respondents request a more thorough explanation of the decision-making process for apportioning growth to certain settlements, with specific settlements given as examples of where too much development is concentrated in one place.

Promotion of Development Sites

The majority of the proposed allocation sites have been supported by the respective landowner, promoter or developer, and a significant amount of supporting evidence has been submitted. Evidence has also been submitted for a large number of alternative sites, where the promoters believe their site should be allocated in the plan. Some respondents challenge the site selection process in terms of the clarity and transparency of the assessment.

The promoters of all the larger proposed housing allocations have submitted significant amounts of supporting evidence, which together with the evidence for smaller sites will need to be considered in detail and discussed with specialists within the Council as well as infrastructure providers, Leicestershire County Council and neighbouring authorities.

There are some substantial alternative proposals, including: two new settlement proposals, large-scale development in Loughborough, and major development proposals in Anstey, Barrow upon Soar and Rearsby.

There is a significant employment proposal adjacent to junction 23 of the M1 and Leicester City Council has promoted a new site in the south of the Borough to meet its needs for burial space.

Concerns are raised in relation to individual proposed sites and also the concentration of sites in certain settlements. This includes a range of concerns about whether there will be sufficient infrastructure to support development, whether flood risk will be increased, how traffic will be managed, and concerns about the landscape and biodiversity impacts. There is a lack of confidence that certain aspects of the planning system will work including the robustness of flooding evidence and delivery of adequate infrastructure. More generally, there is a request for clearer explanation of the decision-making process used by the Council to select proposed development sites across the Borough.

Infrastructure

Respondents highlight the pressure proposed development will put on local infrastructure, especially schools and health services. It is argued that many services and facilities are already over-subscribed and social services are under pressure. Concerns are also highlighted about the focus on bus access when the Council exerts no control over this service.

The West Leicestershire Clinical Commissioning Group highlights concerns about the scale of development in Shepshed; Leicestershire County Council Education highlights significant challenges in meeting primary education needs across the Borough; statutory bodies such as Severn Trent Water and the Environment Agency highlight that close collaboration is required to ensure that current infrastructure is supported/enhanced, and where appropriate new provision is made to meet new demands. Leicester City Council highlights that the preferred spatial development strategies for both the City and Charnwood direct growth to the north/north-west of the urban area of Leicester and therefore it will be important to ensure close working on cross boundary infrastructure matters. This issue is also raised by North West Leicestershire District Council in relation to the International Gateway and by Leicestershire County Council Highways in relation to both areas.

Highways England also highlights the likely impact on the operation of the M1, specifically between junction 21A and junction 24, and on the A46 of the development on the edge of Leicester, Loughborough and Shepshed.

Leicestershire County Council Highways highlight that, while in overall terms the levels of housing growth proposed can be accommodated subject to appropriate, coordinated mitigation, the more dispersed pattern of growth that is proposed means that it will be important that cumulative impacts are also identified and mitigated.

Climate Change / Environment

Many respondents highlight the unique natural assets of the Borough and that development should not proceed because it would have a detrimental impact on their future. Others note that the local plan threatens to compound issues associated with climate change, rather than seek to adapt to, and mitigate the impacts – citing incidents of increased flooding and a lack of infrastructure resilience as areas of concern.

Some respondents make the connection between the role of green spaces, the landscape, defined areas of separation between settlements, and the overall sense of place within the Borough as something that should be protected. This view is contrasted by others which consider that certain locations and settlements have been unduly protected, resulting in disproportionate losses elsewhere in the Borough.

Some responses have praised the aspirations to protect and enhance key assets, increase tree planting and facilitate renewable and low carbon energy, whilst other responses note that the policies are not sufficiently detailed, and the Council is not in a position to deliver against the aims.

Other Policy Areas

There are also a number of more technical issues to address, where respondents have requested further detail on, or suggested alternative approaches to, how the Council will:

- meet the requirement to have 10% of new development on sites that are less than one hectare
- deliver an increase in the number of plots available for self-build and custom housebuilding
- provide a decision-making framework for proposals in the countryside and outside Limits to Development

- manage the impacts of HMOs and purpose-built student accommodation in parts of Loughborough
- respond to changing economic circumstances and the need for greater flexibility in the way that employment land is delivered
- strike the right balance between promoting retail in the town centres, versus flexibly responding to changing market conditions for traditional retail
- deliver the requirements for sustainable construction whilst reflecting the viability of development schemes across different locations in the Borough
- manage the cumulative impact of development in certain locations, eg Shepshed, Loughborough and the Leicester Urban Area.

Issues Raised in Completed Fliers with Key Questions

As described above, a flier with four questions was provided for people, particularly young people, who would find that a more accessible way of providing their views on matters relating to the draft plan than using the full consultation document. The questions were:

- What is the most important issue facing Charnwood and your town/village over the next 15 years?
- What makes Charnwood and your town/village special?
- What can we do to maintain and enhance Loughborough town centre as a good place to visit?
- How can we do our bit to deal with climate change?

The questions have been analysed using word clouds and the responses to the questions are shown below.

What is the most important issue facing Charnwood and your town/village over the next 15 years?



What makes Charnwood and your town/village special?



What can we do to maintain and enhance Loughborough town centre as a good place to visit?

Things to do more of



Problems to address



How can we do our bit to deal with climate change?



The responses to this method of consultation highlight the following key issues that will need to be considered in developing the local plan:

• the need to balance the competing priorities of providing homes, especially affordable homes, ensuring development is supported by sufficient

infrastructure, particularly schools and health services, and protecting the environment

- the importance of community and quality of life issues to people and the particular roles that heritage, sense of place, trees and green spaces play for people
- while retail is a key component of what makes Loughborough town centre a good place to visit, its attractiveness is made up of a wide range of other components as well
- similarly, desirable places exhibit a number of different positive characteristics rather than a single one;
- there is an important role for individual behaviour and enabling those behaviours in addressing the challenges of climate change.

Customer Satisfaction

The Council is keen to ensure that its consultation processes are effective and meet the needs of local residents and other interested parties. In order to measure the effectiveness of the consultation the following methods were used:

- the consultation questions included one asking how people became aware of the consultation
- a customer satisfaction questionnaire was given to people attending the consultation roadshow events
- all responses to the consultation were acknowledged and as part of the acknowledgement respondents were asked for their views on the consultation and how easy it was to find the information they needed.

The results of these surveys are summarised below.

1. Responses to question regarding how people became aware of the consultation (46 received)

Source of Information about Local Plan Consultation		
Source	Number of Responses	
Charnwood Borough Council	24	
Website (7)		
 Local Plans email (4) 		
 Facebook (4) 		
Charnwood News (3)		
 Charnwood Now (3) 		
 Planning News Alert (1) 		
Twitter (1)		
CBC itself (1)		
Local newspaper	7	
Parish Council	5	
• Letter (1)		
Meeting (1)		
 Facebook Group (1) 		
Parish Council (2)		
Within own organisation	4	

Source	Number of Responses
Facebook group	1
Local Councillor	1
Local radio	1
Email	1
Local group on social media	1
Other (Keep East Goscote Green)	1
TOTAL	46

 Results of customer satisfaction questionnaires from people attending the consultation roadshow events (11 received but not all questions answered on all forms)

			Respo	onse	
Statement	Strongly disagree	Tend to disagree	Neither agree nor disagree	Tend to agree	Strongly agree
Staff were helpful and polite				2	8
You were treated fairly and with respect				1	9
Advice given was accurate and professional				4	6
We communicated clearly with you				2	8
The exhibition met my expectations	2	3	2		3
TOTAL	2	3	2	9	34

While it is encouraging that the way in which the events were conducted was well received, the responses suggest that more could be done to ensure that future exhibitions meet people's expectations. From comments made at and after the exhibitions this could include improving the visual material that is available at the events.

3. The Council received feedback that the online consultation portal was difficult to use. The Council is meeting with the provider of the portal to see if it can be made easier to use in time for the next round of consultation.

Next Steps

The responses to the consultation and further evidence that the Council will prepare will be used to inform the preparation of a Pre-Submission Charnwood Local Plan. This version of the local plan will undergo a further round of statutory consultation, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The local plan and the responses to that consultation will then be submitted to the Secretary of State for an examination in public. If the appointed Planning Inspector finds the plan is sound it will then need to be formally adopted by the Council before it becomes part of the development plan.

CHARNWOOD LOCAL PLAN – STATEMENT OF CONSULTATION

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Chapter 2 - F	Profile of Charnwood	
	we have included the right information in the Profile? you include or exclude and why?	
DCLP/14 Dr Catharine Ferraby	 I think there needs to be much more about the special environment of Charnwood, eg wildlife, forest areas and unique geological features. There is the potential to destroy habitats and public amenity by insensitive development, so the plan needs to set out in much more detail what Charnwood offers in terms of environment. 	Noted – inclusion of further information about the environment will be considered.
DCLP/75 Mr Paul Unwin	• Yes	Noted – support is welcomed.
DCLP/83 Mr Dennis Marchant	 Basically ok Under 'accessibility and transport' would like to see details of the percentage of the borough's population that live on a bus route and cycleway or within 400m of the service and similar for electrical vehicle charging points. 	 Noted – support is welcomed. Noted – inclusion of further information about sustainable transport will be considered.
DCLP/129 Mr Martin Peters	• As the visitor economy is featured right at the start of the vision, it would be useful to see a section of statistics in the profile section relating to the visitor economy, as for the other themes. These are available in the tourism blueprint or LPL. There is also up to date STEAM data available for 2018.	Noted – inclusion of information about the visitor economy will be considered.
DCLP/139 County Councillor Max Hunt	 There is an excellent list of referenced statistics in the Profile but transport is less well expressed. The proportion of households owning one or more private cars (and those not) would be relevant. Rail is mentioned twice but could refer to intercity and local stations. Bus gets a mention alongside footpaths but given the emphasis in the plan on the provision of public transport and the fact that bus travel is the most popular form of public transport in the Borough, it needs an explicit reference. It is also notable that bus is a prime service to East Midlands Airport and as a centre of employment. Cycling, Walking should speak for themselves and Charnwood hosts two network links into the City, NCR 6 and NCR 48. 	Noted – support for significant parts of the profile is welcomed. Suggestions regarding additions and changes will be considered.
DCLP/176 Mr Joseph Hall	 The profile should consider sport, recreation and physical activity within the Borough. Levels of physical activity are strongly connected to physical 	Noted – inclusion of information about physical activity will be considered.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	and mental health and provide opportunities for social cohesion. Loughborough has a world-class reputation in sport but Charnwood as a Borough has lower levels of physical activity than the national average.	
DCLP/183 Quorndon Parish Council	 Under 'accessibility and transport' would like to see details of the percentage of the borough's population that live on a bus route and cycleway or within 400m of the service and similar for electrical vehicle charging points. 	Noted – inclusion of further information about sustainable transport will be considered.
DCLP/199 Mr Glen Baker- Adams	 Seems to provide a sufficient overview of the area in simple form. Could include information about how Charnwood compares with national average and other areas in the county. 	 Noted – support is welcomed. Noted – inclusion of comparative information will be considered.
DCLP/215 Professor David Infield	Air quality is a key health and environment indicator and should be included under the Environment heading.	Noted – inclusion of information about air quality will be considered.
DCLP/223 Mr Gideon Cumming	• I would suggest that the profile includes an assessment of the number of empty retail spaces within Loughborough. If it is the goal of the local plan to make Loughborough town centre a prosperous, attractive and vibrant destination for shopping this matter should be measured and a plan established to address it.	Noted – inclusion of information about empty retail spaces will be considered.
DCLP/246 Vale Planning Consultants	• Yes - I believe that this provides a good summary of the key elements of the Borough.	Noted – support is welcomed.
DCLP/253 Mr Richard White	• Could anything be added about the voluntary and charity sector that makes a huge contribution to the economy and community?	Noted – inclusion of information about the voluntary and community sector will be considered.
DCLP/268 East Leicestershire & Rutland Clinical Commissioning Group	 I think it would be useful to include the number and location of GP surgeries under the Health and Care section. 	Noted – inclusion of information about GP surgeries will be considered.
DCLP/298 and DCLP/299 Mr Phil Sheppard	 There is nothing about agriculture. In particular, there should be a table or list showing the areas of agricultural land in each quality grade - A, B etc. There is very little about business. I'm sure the ONS have data on GVA per council district, and this would be useful to see. Of the population of registered businesses, what is their age breakdown? This would tell us to some extent how entrepreneurial we are. What proportion of the Borough's practically feasible renewable energy potential is being captured? 	Noted – these suggested additions and amendments will be considered.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 Some stats give the increase in absolute numbers over a period, e.g. dementia, mobility, but additional value could be gained by also saying the relative proportions of the population in the starting and ending years of the period. There are several stats for different aspects of population which say how the aspect will grow e.g. increase in the number of people with a long term health problem, or with dementia, but no percentages are given so we can see if the aspect will be getting worse or better. Can you split semi-detached between 2 & 3 bed homes? 	
DCLP/345 Mr John Barton	 Please include the proportion of housing that is suitable for the elderly. E.g. ground-floor accessible (also wheelchair accessible), warden assisted, residential homes, nursing homes. 	Noted – inclusion of information about accommodation suitable for the elderly will be considered.
DCLP/378 Vivienne Barratt- Peacock	 It would be helpful to know how many patients are registered per GP and how this compares nationally. What proportion of residents live within the recommended 400m of a bus stop? What plans are there to improve public transport so that everyone has access to it, particularly those in the smaller villages? Details of how many pupils can access their first choice of school would be useful. Schools are oversubscribed. More school places are needed so that families can send their children to their local school 	 Noted – inclusion of information about GP lists, access to public transport, school rolls and ability to access first choice of school will be considered. Noted – issues relating to access to public transport and school capacity are important and have been addressed in the relevant sections of the plan.
DCLP/380 Mrs Emma Wood	Air quality and biodiversity (loss etc) should be included.	Noted – inclusion of information about air quality and biodiversity will be considered.
DCLP/385 Dr Martin Field	 I would include summary details of residential housing tenures (owner-occupied, privately rented, social tenancies, etc.) 	Noted – inclusion of information about housing tenures will be considered.
DCLP/402 Mr Martin Smith	I don't feel the transport network is well developed.	Noted. It is considered that the Borough is well served in terms of its road, rail and cycleway connections.
LDCLP/02 Anonymous	You have excluded university student accommodation	Noted – inclusion of information about student accommodation will be considered.
EDCLP/34 Cllr Mary Draycott	 The 2019 Indices of Multiple deprivation (IMD) have been released. It shows the Bell Foundry/Russell St area, in Hastings Ward, Loughborough is ranked at 699 out of 32,844. 	 Noted – information will be updated accordingly. Noted – consideration will be given to making reference to Bell Foundry/Russell St area specifically.
EDCLP/39 Lynda Needham	Accessibility and Transport – Journey times will need to be updated to take into account of the approved development West of Loughborough and at Shepshed. Environment – Many of the sites that are open to the public can only be accessed by car and for some of them there is a charge	 Noted – amending the figure will be considered. Noted – the purpose of the profile is to provide a high level summary of the characteristics of the Borough. There are significant areas of countryside in the parish of Shepshed included important landscapes within the National Forest and the

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	for parking. Shepshed has lost most of its countryside and Public Rights of Way (PROW), which are now integrated in housing estates. More trees need to be planted and open space provided to redress what has been lost to development including West of Loughborough SUE.	Charnwood Forest Regional Park. The local plan contains policies to promote tree planting and address the protection and provision of open space.
EDCLP/55 Sileby Parish Council	 The profile fails to reflect the important rural dimension to the Borough. As a result the local plan may fail to address the needs of rural communities, in particular the need to balance the vitality of rural communities with protecting them from large-scale housign developments which address more than local needs. The profile should include information about changes from 2011 (the base line of the Core Strategy) to 2019 as well as from 2019 to 2036. This information should include population change, amount of development, development on small sites, development on brownfield sites and the provision of infrastructure. The additional information should be provided at the level of each settlement, at least for service centres, which would provide a more transparent way of assessing whether the vision and objectives have been achieved for the different communities that make up the Borough. 	 Noted – information regarding the rural aspects of the Borough, including the rural economy will be considered. Noted – consideration will be given to providing a summary of changes that have happened during the period covered by the Core Strategy. Noted – consideration will be given to whether there should be separate information relating to different settlements within the Borough.
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	 The total housing stock across the Borough as at 01/04/2019 should be provided together with the number of new houses which have been added to the housing stock since 2011 (ie the start date for the adopted Local Plan). An indicator should show whether the amount of new housing built is above or below the Local Plan minimum target. 	 Noted – inclusion of information about growth in housing stock will be considered. Noted – a monitoring framework will be provided for the presubmission local plan that will include appropriate indicators for housing delivery.
EDCLP/65 Mr W Leek	• Yes	Noted – support is welcomed.
EDCLP/74 Mr Hussain	 The profile conflicts with everything the way I see it so, I'm not entirely sure how this response is going to formulate itself but only further reading shall reveal. 	Noted.
EDCLP/80 Historic England	 Reference to heritage assets, including locally listed buildings, within the 'Environment' section of the Profile is welcomed. It should also include reference to other non-designated heritage assets and archaeology. 	 Noted – support is welcomed. Noted – inclusion of further information about heritage and archaeology will be considered.
EDCLP/121 Marie Birkinshaw	 Overall, very useful and informative. Could also usefully show the following in the environmental section: 	 Noted – support is welcomed. Noted – inclusion of further information about green space will be considered.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/125 Tim Birkinshaw	 % of public green space (parks, allotments, sports fields, etc) % of gardens as green space % of brown field, unimproved space % of population living within 10 minutes' walk of green space. Information included looks useful. Extra information could include: past population levels (10 & 20 years ago or 2011 census) to show what growth has been levels of homelessness/substandard accommodation (level of unmet need) in and out levels of commuting – only net level is given Midland Mainline has not operated the train services through Loughborough for 12 years. The current operator is East Midlands Railway. The local train service from Loughborough (especially to Leicester) is poorer now than it was 25-30 years 	 Noted – support is welcomed. Noted – inclusion of further information about past population levels, homelessness/ substandard accommodation and commuting will be considered. Noted – the term Midland Mainline is used as it relates to the London/ Nottingham/ Sheffield route as well as a previous operator of the franchise.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 ago. This is a useful profile of Charnwood as far as it goes. It could be enhanced by the following additional information: Given the lack any nationally designated Green Belt, National Parks and ANOB, it would be useful to have data on the area of green wedges, green spaces designated by the local plan and neighbourhood plans as well of areas that are Local Wildlife Sites, SSSIs and National Nature Reserves. The profile suggests 'Charnwood has a well-developed transport network'. However it only lists the infrastructure, mainly road links. Figures on car ownership and usage, bus usage and rail trips are needed. For instance, the profile says there is a net commuter outflow of 11,589 daily from the Borough. How many of these involve car travel as opposed to the use of public transport? Data from the 2011 Census indicating very low public transport use should be highlighted in the Profile. Given the increasing likelihood of flooding events and the statement in para. 8.25 that approximately 12% of the Borough lies in Flood Zone 3, statistics of housing at risk ought to be part of the profile. In addition, the plan should produce as an appendix a separate map on which development sites are shown in relation to the flood risk zones. 	 Noted – inclusion of further information suggested will be considered. The pre-submission version of the plan will include maps that show both allocations and flood risk.
EDCLP/147	Missing is any recognition of our farming industry and the	 Noted – information regarding the rural aspects of the Borough,

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Hoton Parish Council	 agricultural/arable landscape which dominates much of the borough. High-speed trains on the Midland Mainline link Loughborough to London, Leicester, Nottingham and Derby. The A606 does not link Loughborough to Nottingham and lies entirely outside Charnwood. 	 including the rural economy will be considered. Noted – information about high speed train links will be included. Noted – information about road links to Nottingham will be clarified.
EDCLP/165 Dr S.J. Bullman	 It takes longer than 5 minutes to drive from Loughborough to the M1. This has been made worse during the road works on the A512. It also reflects the massive traffic overload on the local roads during most work-time/daylight weekend hours. 	 Noted – amending the figure will be considered. The local plan will be informed by transport modelling work that will assess the impact of policies on the highway network.
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	• The second paragraph of the Profile for Charnwood in relation to settlements refers to Shepshed and Syston as large towns and then 30 smaller settlements in the form of villages and hamlets. The profile appropriately recognises the role of Syston as the third largest town in the Borough.	 Noted - the text refers to Shepshed and Syston as the second and third largest towns in the Borough, and is a statement of the ranking of settlements by size.
EDCLP/200 Ian Dickinson Canal & River Trust	 Suggest that the profile could also refer to the 25km of the Grand Union Canal/River Soar Navigation which passes through the Borough and provides a valuable link to the wider navigable inland waterway network across the country. 	 Noted – inclusion of information about Grand Union Canal/River Soar Navigation will be considered.
EDCLP/205 Guy Longley Pegasus obo Davidsons Development Ltd (Anstey)	 The Profile for Charnwood in relation to settlements refers to Shepshed and Syston as large towns and then 30 smaller settlements in the form of villages and hamlets. This description does not properly recognise the role of the large settlements along the Soar and Wreake Valleys, including Anstey. These are important and sustainable centres reflecting the range of services and facilities available. The Profile should be amended to recognise the particular role played by the larger settlements such as Anstey which should be identified as an urban settlement forming part of the wider Leicester urban area. 	 Noted – the purpose of the profile is to provide key information about the Borough. More detailed information about the settlement hierarchy is set out in chapter 4 of the plan and the 2018 Settlement Hierarchy Assessment. The text refers to Shepshed and Syston as the second and third largest towns in the Borough, and is a statement of the ranking of settlements by size. However consideration will be given to whether wording should be changed.
EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold)	 The Profile for Charnwood in relation to settlements refers to Shepshed and Syston as large towns and then 30 smaller settlements in the form of villages and hamlets. This description does not properly recognise the role of the more sustainable smaller settlements in the Wolds villages, such as Wymeswold. The Profile should be amended to recognise the particular role played by the more sustainable other settlements such as Wymeswold. 	 Noted – the purpose of the profile is to provide key information about the Borough. More detailed information about the settlement hierarchy is set out in chapter 4 of the plan and the 2018 Settlement Hierarchy Assessment. The text refers to Shepshed and Syston as the second and third largest towns in the Borough, and is a statement of the ranking of settlements by size. However consideration will be given to whether wording should be changed.

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EDCLP/207 Guy Longley Pegasus obo Davidsons Development Ltd (Sileby)	 The Profile does not adequately reflect the spatial settlement character of the Borough with a range of larger settlements along the Soar and Wreake valleys being important centres for housing and employment and supporting services and facilities. The Profile should be amended to recognise the particular role played by the larger settlements such as Sileby. 	 Noted – the purpose of the profile is to provide key information about the Borough. More detailed information about the settlement hierarchy is set out in chapter 4 of the plan and the 2018 Settlement Hierarchy Assessment. However consideration will be given to whether wording should be changed.
EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Field Head)	 The Profile of Charnwood makes little reference to the strong interrelationships between parts of the Borough and settlements in adjoining districts (eg between the western part of the Borough and Markfield falling within Hinckley and Bosworth). Residential areas at Field Head physically abut the boundary with Hinckley and Bosworth and naturally look towards Markfield for access to day to day services and facilities. 	 Noted – inclusion of information about links with Markfield will be considered.
EDCLP/209 Amy Smith Pegasus obo Jelsons	 Paragraph 2.3 of the Profile refers to the rural area of the Wolds having strong links to Nottinghamshire and the City of Nottingham. Reference could be made to key developments in adjoining districts that will have implications for the Borough and the development strategy. The Defence Estates Medical Rehabilitation Centre (DMRC) at Stanford Hall, just across the Borough boundary in Rushcliffe, is an important facility that will offer employment opportunities and potential requirements for housing for both employees and military personnel and their families. Due to its importance and potential expansion to include a National Rehabilitation Centre, the facility should be referred to in the Profile. 	 Noted – consideration will be given to including key developments in neighbouring districts and the DMRC in particular.
EDCLP/224 Paul Newton	 M1 motorway is more than 5 minutes' drive from Loughborough, especially at peak times / during congestion. 	Noted – amending the figure will be considered.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	 It is important that the numbers 218 LWS and 18 SSSI are mentioned (although the supporting ecological plan says that there are 17 SSSIs, so this figure needs to be double checked). It is more important to indicate that these represent only x% of the different habitats of the area, or only x% of the entire area (perhaps giving national average comparisons - see section 3.14 to 3.16 of the supporting ecological report). There can be little doubt that Charnwood Forest is the most important area in Leicestershire for both wildlife and geology, for example in 2009 there were 21 legally protected Sites of Special Scientific Interest (SSSIs) in the area covering 8.2% of it, compared to about 1.3% over Leicestershire as a whole. Local Wildlife Sites cover 5.3% of the Forest, compared to 1.25% of Leicestershire and Rutland. 	 Noted –suggestions regarding additions and changes will be considered.

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	 The condition of the LWS and SSSIs would also be useful information to include. If there could be, it is here where there should be a quick breakdown of the proportion of different habitats in the area, too. The area is internationally important for geology with several Regionally Important Geological Sites (RIGS), these should be mentioned in the profile. In terms of other statistics, it would be important to indicate the number of people employed in the rural and environmental economy, and their average incomes, age profiles, etc. 	
EDCLP/226 Eleanor Hood	• As people born at the end of 1954 will not be getting their state pension until they are 66, to look at the profile in terms of 16-64 year olds is out of date. It should be 16-65 year olds.	• Noted – it is standard practice to divide populations into three groups: 0-15 (children), 16-64 (adults) and 65+ (older adults). It is recognised that the cut off at 65 does not apply to all circumstances but it remains the standard measure.
EDCLP/237 P. Williams EDCLP/182	 Specific information on environmental quality should be quoted where it exists for example on air quality and condition of SSSIs. 	 Noted – inclusion of information about air quality and condition of wildlife sites will be considered.
Pegasus obo David Wilson Homes	 The profile refers to Loughborough as the main town, Shepshed as the second largest town, and Syston as the third largest town. The profile goes on to confirm that there are then 30 smaller settlements in the form of villages and hamlets. It is considered that this description does not properly recognise the role of the more sustainable smaller villages. The profile should be amended to recognise the particular role played by the more sustainable other settlements such as Queniborough, as Other Settlements. 	 Noted – the purpose of the profile is to provide key information about the Borough. More detailed information about the settlement hierarchy is set out in chapter 4 of the plan and the 2018 Settlement Hierarchy Assessment. The text refers to Shepshed and Syston as the second and third largest towns in the Borough, and is a statement of the ranking of settlements by size. However consideration will be given to whether wording should be changed.
DCLP-425-470 Environment Agency	• From the perspective of the Environment Agency's remit we consider you have considered the right information in the Profile.	 Noted – support is welcomed.
EDCLP/ 245 Avison Young obo Loughborough University	 Yes – Loughborough University welcomes the reference to its Science and Enterprise Park and the role this plays in supporting the local and regional economy. 	 Noted – support is welcomed.
EDCLP/239 Vivienne Barratt- Peacock	 It would be helpful to know how many patients are registered per GP and how this compares nationally. What proportion of residents live within the recommended 400m of a bus stop? What plans are there to improve public transport so that everyone has access to it, particularly those in the smaller villages? Schools are oversubscribed. More school places are needed so that families can send their children to their local school. 	 Noted – inclusion of information about GP lists, access to public transport and school rolls will be considered. Noted – issues relating to access to public transport and school capacity are important and have been addressed in the relevant sections of the plan.

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EDCLP/195 Greg Hutton Davidsons Developments Ltd	 The Profile for Charnwood in relation to settlements refers to Shepshed and Syston as large towns and then 30 smaller settlements in the form of villages and hamlets. This description does not properly recognise the role of the more sustainable smaller settlements in the Wreake Valley, such as Queniborough. The Profile should be amended to recognise the particular role played by the more sustainable other settlements such as 	• Noted – the purpose of the profile is to provide key information about the Borough. More detailed information about the settlement hierarchy is set out in chapter 4 of the plan and the 2018 Settlement Hierarchy Assessment. The text refers to Shepshed and Syston as the second and third largest towns in the Borough, and is a statement of the ranking of settlements by size. However consideration will be given to whether wording should be changed.
EDCLP/204 Guy Longley Pegasus obo Davidsons Development Ltd (Rothley)	 Queniborough. The Profile for Charnwood in relation to settlements refers to Shepshed and Syston as large towns and then 30 smaller settlements in the form of villages and hamlets. This description does not properly recognise the role of the large settlements along the Soar and Wreake Valleys, including Rothley. The Profile should be amended to recognise the particular role played by the larger settlements such as Rothley as Service Centres. 	• Noted – the purpose of the profile is to provide key information about the Borough. More detailed information about the settlement hierarchy is set out in chapter 4 of the plan and the 2018 Settlement Hierarchy Assessment. The text refers to Shepshed and Syston as the second and third largest towns in the Borough, and is a statement of the ranking of settlements by size. However consideration will be given to whether wording should be changed.
DCLP/261 Edward Argar MP	 I believe that the profile of Charnwood is an accurate and fair one. In highlighting links to other towns nearby, I would also add in the strong links to Melton Mowbray for areas to the east of the borough. 	 Noted – support is welcomed. Noted – inclusion of information about links with Melton Mowbray will be considered.
EDCLP/194 Guy Longley Pegasus on behalf of Hallam Land Management	 The Profile does not adequately reflect the spatial settlement character of the Borough with a range of larger settlements along the Soar and Wreake valleys being important centres for housing and employment and supporting services and facilities. The Profile should be amended to recognise the particular role played by the larger settlements such as Sileby. 	 Noted – the purpose of the profile is to provide key information about the Borough. More detailed information about the settlement hierarchy is set out in chapter 4 of the plan and the 2018 Settlement Hierarchy Assessment. However consideration will be given to whether wording should be changed.
EDCLP/252 Leicestershire County Council	 Section on Environment – Include the % of Rights of Way with Ease of Access. 	 Noted – inclusion of information about rights of way with ease of access will be considered.
EDCLP/252 Leicestershire County Council	• Town centre leakage figures and a list of key tourism assets need to be included to help understand how the local town centres currently function and the assets they contain.	 Noted – inclusion of information about town centre leakage figures and key tourism assets will be considered.
EDCLP/277 RPS obo Bellway Homes	 The profile appears to provide a full and comprehensive list of the key characteristics for the Borough and uses local indicators including market signals to understanding the housing market. 	 Noted – support is welcomed.
Q2 - Do you have any comments on the vision and objectives or think we have missed something?		
DCLP/15 Dr Catharine	I think the mention of air quality could be expanded to identify which polluting components will be limited, eg particulates,	Improving air quality is an important part of the overall objectives of the draft local plan. However, it is agreed, that a stronger reference to air

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Ferraby	agricultural pollution? Taking flood risk into account is essential. It may be mentioned later but public sports facilities are over used	quality could be made in the draft local plan. This will be reviewed before the plan is next consulted on.
	and under maintained in the Borough. Would love to see more swimming pools (the benefit an aging population as they provide weightless exercise)	Flood risk is a priority and a series of policies ensure that flood risk is taken into account when choosing locations for new development.
		Sport provision will be managed through the implementation of Draft Policy LP25.
DCLP/84 Mr Dennis Marchant	Support the policy but would like to see the Environment section strengthened by adding: To protect the individual identity of communities and enhance the sense of community wellbeing by protecting the areas of separation and the prevention of coalescence.	Noted – Draft Policy LP19 is worded to protect the identified areas of local separation.
DCLP/130 Mr Martin Peters	There is nothing in the challenges section or the objectives that directly refer to or evidence the visitor economy. As it features in the vision, this needs to flow through to the rest of the document as with the other themes.	Noted – it is agreed, that a stronger reference to the visitor economy could be made in the draft local plan. This will be reviewed before the plan is next consulted on.
DCLP/141 County Councillor Max Hunt	The Vision is longer than the Objectives! So this section would benefit from being more concise. Should the objectives possibly reflect each of the chapters? Its unclear whether these are all to be delivered through the Local	The vision is the expected outcome from delivering the policies set out in the local plan. The vision is a corporately owned aim, signed off by the Council.
	Plan, which is essentially a spatial policy or a wider corporate strategy. If the latter, it should be clear. If the former, then it needs to be precise and concise. The impacts of climate change and the reduction of climate change	The objectives are more intrinsically linked to actions that can achieve sustainable development, and are grouped by the main three components of the definition of sustainable development.
	were not clear or addressed discretely. Given that there is a complete chapter on Climate Change it is strange that it is somewhat lost at the end of the lengthy Vision and buried in the Environment section.	The policies in the draft local plan then link back to the objectives, with the concept that implementing the policies would also result in the Council meeting the objectives.
	Section 5 on the Environment refers to "sense of place" followed by tree planting in the same sentence. Were they intended to be two separate paragraphs? Sense of place is such an important aspect of development and regeneration, as is tree planting, but they do not equate to the same thing.	
DCLP/150	There is a commitment to improve the quality of jobs. How will this	The Council remains a committed partner to the Leicester and
Mr David Campbell-Kelly	be possible when the vast majority of jobs are being created in the County's Authorities' rush to build Logistics at every Motorway	Leicestershire Strategic Growth Plan.
	Junction? There is a desire to reduce the use of car and improve public	The aims and objectives of the SGP are reflected in the draft local plan.
	transport. Where is the commitment and cooperation with other Authorities? There is literally nothing in the Strategic Growth Plan. All the Councils MUST work collaboratively in a coordinated	The Council expects to draft and agree a series of Statements of Common Ground with the statutory authorities across Leicestershire. This will be achieved by the Council meeting its Duty to Co-operate.

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	manner if this is ever to become a reality.	
DCLP/177 Mr Joseph Hall	 Planning policies and decisions should aim to achieve healthy, inclusive and safe places. Planning policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. the vision for Charnwood should present a stronger picture of the development of a healthy borough, focusing more of a priority to the development of a place which puts health at the forefront of development. New developments should require their impact upon health to be clearly considered and stated, with all reasonable efforts made to maximise the connectivity of communities and prioritise active travel (making the position more clearly stated than having 'a choice to walk or cycle' and ensuring that choice is made as attractive and realistic as possible). 	Noted – strong and healthy communities are both referred to in the objectives but the wording of the key challenges will be reviewed in response to the comments.
DCLP/184 Quorndon Parish Council	 demonstrated within the vision. Supports the policy but would like to see the Environment section strengthened by adding: 'To provide separation and individual identity of communities and to enhance the sense of community wellbeing by protecting the areas of separation and the prevention of coalescence.' 	Noted – support is welcomed and Draft Policy LP19 is worded to protect the identified areas of local separation.
DCLP/196 Mr. John Catt	 One challenge you have omitted is that the population is becoming less physically active and this increases the risk of obesity and many other health problems (including mental health). Another challenge is establishing/enhancing a sense of community. With people using cars to shop and go to widely scattered leisure venues many people no longer know their neighbours. 	Noted – strong and healthy communities are both referred to in the objectives but the wording of the key challenges will be reviewed in response to the comments.
DCLP/204 Mr John Owens	 Given that over 70 percent of workers travel by car it would be good to see greater commitment to public transport. Some strategic objectives related to integrating road and rail connections would be good. Perhaps particular support to 'villages', not necessarily on the old straight links as spokes to Leicester. Possibly village hopper services feeding hubs (e.g. Beaumont Leys or Glenfield Hospital, Loughborough, etc.) then 	Promoting sustainable travel patterns, greater usage of public transport, and higher levels of active travel are integral parts of the draft local plan. Draft Policy LP33 sets out specific criteria to promote sustainable travel.

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DCLP/216 Professor David Infield	 develop fast frequent services from hubs. There is no mention of Public Housing. Is this because Charnwood does not wish itself to build any Council Housing? 	The Council's Business Plan 2019-2020 identifies that the Council will establish a Housing Delivery Company to provide a vehicle for investment in land and property.
DCLP/224 Mr Gideon Cumming	• I am pleased to read about the inclusion of the preservation and enhancement of the historic environment. In the past some planning decisions seem to have gone against this objective.	Noted – support is welcomed.
DCLP/247 Vale Planning Consultants	 The vision for the Borough and the objectives for achieving this vision are comprehensive, concise and well-structured, and I therefore do not believe that amendments are necessary. 	Noted – support is welcomed.
DCLP/272 East Leicestershire & Rutland Clinical Commissioning Group	• No	Noted
DCLP/300 Mr Phil Sheppard	 Objectives should, as much as possible, be capable of being assessed at a later date as to whether they are being or have been met. This usually requires them to be measurable. Few of these objectives include measurable aspects or dimensions, but I think they should. Environment 6 says "to protect the Borough's soil resources" but there is no mention of a presumption that agricultural land of high and relatively high quality will not be developed. We need to produce more from our soils, not have them covered over with Tarmac. This meets the sustainable development aim of the NPPF. Others have highlighted the importance of a sense of place and how that is achieved through separate settlements. I support this. I would also argue strongly that retaining largely green, undeveloped views associated with open countryside should be included as an objective. I think this is undervalued as a contributor to mental and spiritual health. I recognise I need to provide evidence for this, but I would be surprised if the planning profession is not discussing it. Finally, I have long thought that Loughborough should have an ambition to surround itself with country parks. This would be an innovation in proactive planning which would make it a uniquely attractive place for people to live and work in, providing huge amenity. It would also provide a novel type of green belt. 	The objectives are intrinsically linked to actions that can achieve sustainable development, and are grouped by the main three components of the definition of sustainable development. The policies in the draft local plan then link back to the objectives, with the concept that implementing the policies would also result in the Council meeting the objectives. It is the policies in the draft local plan that will be monitored. The implementation of each policy will be reviewed and monitored with progress set out within the Authority's Monitoring Report, produced annually.
DCLP/307 Dr Satbir Jassal	Section 3.2. The line on impacts on separation and identity of settlements needs to be stronger. It is very important to maintain	Noted – Draft Policy LP19 is worded to protect the identified areas of local separation.

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	the integrity of the rural countryside around Loughborough itself by leaving positive areas of separation around the smaller hamlets and villages. The unique character of the hamlets and villages need to be maintained by restricting building to be in keeping with the local environment.	
DCLP/315 Miss Yvonne Round	I agree with those who have also emphasised the importance of protecting community identities. It is frequently forgotten that areas of separation, such as valuable agricultural land, have a significant impact on our overall well-being whilst bringing the structure, look and feel that make our borough an enjoyable place to live. Surely, there should be a greater consideration for this in the objectives? Why not look for inspiration from other cities throughout the world that have increased housing whilst maintaining green space and identity?	Noted – Draft Policy LP19 is worded to protect the identified areas of local separation.
DCLP/346 Mr John Barton	You have missed something. You need to make the towns and villages welcoming places to visit and spend time. There is no mention of the shortage of free car parking, lack of free-of-charge public toilets and shortage of safe cycling routes through Loughborough town centre, and alongside / parallel to rural roads. "Build it and we will come back".	The policies in the draft local plan aim to raise the quality of place within the towns and villages in the borough – with the aim to make them more attractive to residents, businesses, and visitors.
DCLP/379 Vivienne Barratt- Peacock	Environment: "To protect and enhance the historic environment and the identity of the Borough's locally distinctive towns, villages and neighbourhoods." In order to achieve this, development must be fairly distributed. Already the Service Centres have lost a lot of their character due to over development in recent years. Rothley is hardly recognisable as the village it was when we moved here 13 years ago as it has grown by 70% in that short time. Development needs to be spread amongst the smaller villages and hamlets as well. These have been protected for many years and it is time that they shared the burden of development. Flooding: Much of the Soar Valley area comes to a standstill when it rains due to flooding. The road from the A6 into Barrow takes all of the traffic and queues reach back to the A6. This has been the case the majority of this Autumn and has made travel very difficult. New housing has exacerbated the problem. Flood defences and roads need to be improved before more housing is built. In Rothley Wellsic Lane and Town Green Street flood regularly, ruining houses. What is supposed to be a once in 100 year event is now occurring many times in one year! The new houses at Primrose Hill/ Baum Drive also flood, despite the balancing ponds	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The Second Interim Sustainability Appraisal Report considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects. Flood risk management is an important issue for the Council Draft Policy LP31 sets out the policy approach for ensuring that proposed development does not increase the risk of flooding and that any impacts generated are fully mitigated.

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DCLP/382 Mrs Emma Wood	 and flood assessments completed when the estate was built very recently. The flood assessments are obviously very much outdated and need to be redone as they are currently unreliable as a source of information for planning developments. With the commitment to improving public transport, linking Loughborough train station with the residential areas would be beneficial. Considering a free shuttle to the University from the train station or a park and ride scheme near the motorway will unclog Epinal way. Covered bike parks in Loughborough town with access to facilities such as free air for tyres etc. Ensuring the town cycle network is connected and flows intuitively. Improving the cycle network to the train station would encourage more mixed sustainable transportation for commuters. 	Noted – Draft Policy LP33 sets out the measures that will be put in place to improve sustainable transport across the borough. However, it is agreed, that a stronger reference to improving links between the railway station and the town centre is needed. This will be reviewed before the plan is next consulted on.
DCLP/386 Dr Martin Field	A modern Local Plan should underpin the key challenges that should be made to whatever 'failing' circumstances are found in the local area, and it is evident from the exorbitant costs of all housing tenures that the local housing market is a failing one in Charnwood as it is elsewhere in the UK. The new 'Vision' should underline the need for new properties to be 'affordable' to all inhabitants, in relation to their incomes as their basic ability to meet housing costs, and not link 'affordability' solely to the needs of rural communities	 The Council is committed to meeting the objectively assessed housing needs of the borough. The local housing need figure is calculated by taking account of the affordability of housing in the area. As such, meeting the housing needs figure is one mechanism to help stabilise the cost of housing. Draft Policy LP4 is specifically drafted to help address issues of affordability in the borough, and to boost the supply of affordable homes.
LDCLP/02 Anonymous	How Shepshed will be regenerated with services, schools, doctors to cope	Regenerating Shepshed is a corporate priority for the Council. The impact of planned development on the infrastructure in Shepshed has been considered and appraised. Site assessment work has documented the effects on infrastructure and services; and the Council has prepared an IDP to show the status of current and planned infrastructure.
LDCLP/15 Anonymous	Vision states you will manage growth in Loughborough responding to its relationship with Charnwood Forest yet you are planning to building around it? Objective to protect and enhance range of habitats – not sure if you are doing this with the number of houses to be builtA how does you plan link to the open spaces strategy?	The role, function, and importance of the Charnwood Forest is well understood by the Council. Draft Policy LP20 is written to define, protect, and enhance this unique asset.
LDCLP/34 Anonymous	Whatever policy is put in place, it is critical that Charnwood remains in spirit and environment a market town. Ease of access is essential combined with suitable employment for all.	The vision is clear that Charnwood must build on its assets to become one of the most desirable places to live, work, and visit in the East Midlands.
LDCLP/51 Anonymous	Sustainability, the environment, long term planet health are not at the forefront enough for a sustainable human population.	Adapting to, and mitigating against, climate change is one of the primary aims of the draft local plan.

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EDCLP/26 East Midlands Airport	East Midlands Airport is a significant UK airport and in 2018 handled some 4.9 million passengers. It is also a nationally important cargo airport (second only to London Heathrow) handling 365,000 tonnes of cargo in 2018. East Midlands Airport is the UK base for global express freight carriers DHL and UPS who rely on its available airport capacity, the central location and direct access to the Strategic Road Network (M1, A42, A453 and A50). Both DHL and UPS have recently made significant investments in new facilities at the Airport. The Airport site and the immediate East Midlands Enterprise Gateway area is an important national and regional economic and employment asset. Recent studies have estimated that the Airport generates some £500m of direct, indirect and induced GVA in the East Midlands. In 2017 there were 7,954 people working on the Airport site and the Airport is a significant employer for Charnwood residents with 572 on-site employees living in the Borough, many of those living in Shepshed and Loughborough. The Airport is more than just a transport facility and the contribution that it makes to the Borough's economy, as an employer and generator of economic activity could usefully be reflected in the Local Plan document. East Midlands Airport has the potential to grow, both as an important regional passenger airport, but also as the UK's largest express cargo hub. The Airport's long-term plans are set out in the Sustainable Development Plan (2015), and they are also aligned with the emerging national aviation policy that seeks to enhance the UK's global connectivity whilst making the best use of existing airport infrastructure. East Midlands Airport has the capability and the capacity to grow to some 10 million passengers a year and around 1 million tonnes of cargo over the period of the Local Plan. We support the economic objectives that are set out in Paragraph 3.4 of the consultation document and the encouragement of the knowledge-based sector including high technology research and manufacturing.	Noted – support is welcomed. The Council looks forward to engaging with East Midlands Airport to understand how the draft local plan can mutually benefit the Council and the airport.
EDCLP/52 Shepshed Town Council	 'Shepshed, in its role as part of the Leicestershire International Gateway, to secure its regeneration and make the most of its location on the edge of Charnwood Forest'. Nowhere is there an explanation of what the 'Leicestershire International Gateway' is, or how this will impact on Shepshed. Will 	The International Gateway is defined in the Leicester and Leicestershire Strategic Growth Plan. The role, function, and importance of the Charnwood Forest is well understood by the Council.

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	additional resources be made available to secure Shepshed's regeneration and to 'make the most of its location on the edge of Charnwood Forest'? Lack of funding for previous regeneration plans has meant almost nothing being achieved. All that's happened as regards working with The National Forest has been the destruction of hundreds of trees and building houses within the boundaries of the Forest. How do you make sense and translate the location on the edge of Charnwood Forest, what does it actually mean? Concern is expressed at the impact of housing developments within both National and Charnwood Forest. Leicestershire County Council LLEP growth area report draft makes no reference of Shepshed's position regarding the International Gateway. Transport links are non-existent, no rail links, cycle tracks and only the occasional Sky Link Bus to the International Gateway. There is no supporting evidence on how you propose to make it happen, it is rather vague.	Draft Policy LP20 is written to define, protect, and enhance this unique asset. The regeneration of Shepshed is a corporate priority. Any regeneration proposals will have the protection and enhancement of the Charnwood Forest at the forefront of their plans.
EDCLP/55 Sileby Parish Council	The reference to "other settlements" having an attractive provision of local shops, culture and leisur facilities and having retained their individual identity is welcomed as is the objective to provid affordable housing in rural communities. However, there is no commitment to how the individual identity of settlements is to be protected by, for example, preventing unsympathetic, large-sca housing development which caters for more than local needs. Whilst the vision and objectives for use on the vision and objectives for rural settlements. Although there is some reference to neighbourhood planning there is no explanation as to how the CLP will reflect that in practical terms. The Vision and Objectives section should explicit acknowledge that the needs and wishes of local communities will be expressed through the production of Neighbourhood planning there is no explanation of Neighbourhood planning through the production of Neighbourhood planning within the development plan. The draft CLP should incorporate references to already material terms is the vision and objectives of plans within the development plan.	 ^{base} intensification strategy, with some growth dispersed to other areas. ^{base} The vision and objectives are intrinsically linked to actions that can achieve sustainable development, and are grouped by the main three necomponents of the definition of sustainable development. ^{base} The policies in the draft local plan then link back to the objectives, with dethe concept that implementing the policies would also result in the wCouncil meeting the objectives. As such, the objectives listed under the development strategy focus on the three main areas for growth. Together these three areas represent 83% of the planned growth. The vision and local plan recognise the Service Centres for the role they can fulfil in providing a balanced portfolio of sites across the borough to meet local needs. The role of Neighbourhood Plans is set out in the draft local plan. However, it is accepted that the Vision and Objectives could provide a more direct reference to the role and function of NPs, and the way that the policy framework operates and the relationship between the Council's
EDCLP/59	I support the focused approach to managed growth in the three key	Local Plan and any 'made' Neighbourhood Plans. Noted – support is welcomed.
Anonymous	locations, namely, Loughborough, Shepshed, and the edge of	

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	Leicester, and the justifications given in each case. In my view this approach, notably the emphasis on 'managed' growth, is far better than an even spread of development across the Borough with its negative implications, including loss of local distinctiveness and identity.	
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	Some sections of the Vision Statement and the objectives are similar to those which other Districts across Leicestershire and the East Midlands are likely to adopt. For example I am sure that all Districts will include a similar statement to this : ' <i>In 2036</i> <i>Charnwood will be one of the most desirable places to live, work</i> <i>and visit in the East Midlands</i> '. Surely not all Districts can be the most desirable place to live etc!!	Noted – the vision has been tailored to the specifics of Charnwood. However, where possible, the vision will be refined to make it more locally specific.
EDCLP/65 Mr W Leek	No	Noted
EDCLP/74 Mr Hussain	I see nothing so far within the plan relating specifically to the encouragement of entrepreneurship.	Noted – it is agreed, that a stronger reference to entrepreneurship could be made in the draft local plan. This will be reviewed before the plan is next consulted on.
EDCLP/80 Historic England	Within the Environment section of the Objectives, although criteria 4 is noted, there is no reference to heritage assets and their settings, they should be included to ensure compliance with the NPPF.	Noted – Draft Policy LP24 sets out a policy approach to protecting and enhancing assets, and their significance and setting.
EDCLP/108 Sue Barry	Be good to have a food waste collection, could be used for Bio Fuel, fertiliser for gardens. Please look on Southend Council website. They have had this for years. Households are provided with 1 small and 1 large bin and compostable food bags. Small bin kept in kitchen and put out weekly in large bin to be collected. They are then using for Bio Fuel, fertilisers. Excellent scheme and would save food waste going to land fill.	Noted – this response will be used to inform the next draft of the local plan; and will be circulated to the part of the Council responsible for recycling and waste.
EDCLP/121 Marie Birkinshaw	The most significant change that I would like to see is for the biodiversity section to take an earlier prominence in the document to set the context for the house building development proposed. Please include within the vision and objectives aspects of the following: *Regular monitoring and recording of wildlife and nature by species and habitat type to relate to State of Nature Report evidence. Urbanisation is a major driver in species decrease and extinction.	Noted – protecting and enhancing biodiversity is an important priority for the Council. Draft Policy LP22 sets out the Council's detailed approach to biodiversity, including requiring development proposals to provide a measurable net gain in biodiversity, on-site in the first instance or through biodiversity offsetting where appropriate. The vision is intended to be for the whole of the borough, and to be achieved by 2036. Clearly, the local plan has a greater influence on new
	*A desire to work towards a circular economy and promote use of local food, resources, produce, manufacturing and skills. Question on the vision is, is it just applicable to the new build, or	proposals, but, the vision applies to new build and existing built development (where applicable).

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	does the vision cover renovating existing properties to meet carbon reduction needs for net-zero emissions during the time period covered? Does the plan address light and noise pollution and how are these currently measured? There seems to be have been a big increase in both particularly in the last decade and these affect the profile of the town and its surrounds. Especially agree with the key challenges to make the town 'compact, walkable and cyclable.' Try to build these routes along existing nature corridors and waterways – the 'green infrastructure' Not clear practically how Charnwood will be 'well prepared for climate change' on the existing plan. Also the 'excellent connections by bus and rail' remain very much a future vision and urgent action is needed to bring this about and create positive networks to encourage wide use of public transport. Yes, agree low growth, but also state that growth in the economy should not be the only measure on which success of the Borough is measured – and that continued economic growth may not fit well with the necessary net-zero carbon status needed by 2036. There are other well-being measures that could well be included such as the 'Five Ways to Mental Well-being' produced by the Government. [from Q3a]	It is agreed that economic growth is not the only measure of 'success' and aspects to do with quality of life, health and well-being (including mental health), resilience, and sustainability are equally valid measures of progress and change.
EDCLP/125 Tim Birkinshaw	Positive approach Promotion of health and well-being through green spaces and recreation is particularly good. Given the current climate emergency, and the need to reduce greenhouse gas emissions (and so overall energy use) the strategy to reduce travel, especially by private vehicle is very important.	Noted – support is welcomed. Promoting sustainable and active travel is a primary aim of the local plan. Draft Policy LP33 sets out the Council's approach to improving sustainable transport in the borough.
EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	Charnwood's Local Plan has a key role to play not only in ensuring that development needs are met, but also in pro-actively shaping the way in which Charnwood Borough will grow and develop in the future. In this regard, a key priority must be to focus on increasing the quality and quantity of jobs within the Borough, and providing sufficient housing and infrastructure, in the right place and at the right time, to support this economic growth. In addition, the Vision must seek to reverse the long-term trend of worsening affordability by ensuring that affordable housing requirements are met in full. In this regard for Charnwood Borough to deliver its vision and objectives, a positive approach must be taken to address these clear and real unsustainable trends. Accordingly, the Council's pursuit of its current 'low growth' strategy informing the emerging	 The Council is committed to meeting the objectively assessed housing needs of the borough. The local housing need figure is calculated by taking account of the affordability of housing in the area. As such, meeting the housing needs figure is one mechanism to help stabilise the cost of housing. Draft Policy LP4 is specifically drafted to help address issues of affordability in the borough, and to boost the supply of affordable homes.

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	Local Plan lacks real ambition in terms of housing delivery and puts in real jeopardy the ability to meet needs of the future labour market.	
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	It is unclear how this is a vision of the future rather than a long wish list of commendable individual objectives with which few would disagree. However, we get no sense from the list of how different items would be prioritised against each other when they come into conflict. For instance, in para 3.4 (under Environment) the objective to reduce the risk to people and properties from flooding particularly in flood prone areas such as the Soar and Wreake Valleys is inconsistent with policies which allocate more new homes in these areas. Equally, the objective of protecting "the special and distinctive qualities of all landscapes, maintaining local distinctiveness and sense of place" will be compromised as all new development in the countryside and on greenfield sites alters the existing character and qualities of the landscape. We note that in para 3.5 it is suggested that there are three key themes, namely climate change, design and health. Each could provide a cross-cutting theme that draws out a vision any element from the list. An opportunity using these to draw out a vision has been missed by not elaborating on them at this point. While there is a clear section on climate change, it is not really as clear how design and health fit in. The vision could be strengthened if targets and dates were introduced for achieving some of the objectives. There could be a reference to the reuse of buildings, brownfield field land and of building materials as part of the prudent use of resources in the list of objectives. In addition, there could be a stronger reference to cutting different forms of pollution in the No. 7 point under the Environment heading.	 The vision is the expected outcome from delivering the policies set out in the local plan. The vision is a corporately owned aim, signed off by the Council. The objectives are more intrinsically linked to actions that can achieve sustainable development, and are grouped by the main three components of the definition of sustainable development. The policies in the draft local plan then link back to the objectives, with the concept that implementing the policies would also result in the Council meeting the objectives. It is not accepted that the policies in the draft local plan conflict with the objectives, indeed the analysis through the Sustainability Appraisal demonstrates that the proposed policy framework set out in the draft local plan represents the most sustainable option when compared with reasonable alternatives.
EDCLP/147 Hoton Parish Council	The first bullet point in the list of key challenges at 3.2 is the range of housing needs; but there is no mention of homes for older people or other specialist homes in the vision. The vision for a cleaner, greener Charnwood needs to be developed further. Our vision is for a carbon neutral Charnwood by 2036 and a congestion-free transport network. To achieve this there must be a <u>commitment</u> to reducing congestion.	The vision notes that <i>"[o]ur communities will have access to homes to suit their needs</i> ", which is intended to cover the full range of homes required to meet local needs.
EDCLP/164 Dr S.J.Bullman Storer & Ashby Area Residents	Point 5: "managing the issues associated with houses in multiple occupation." We (SARG) have multiple comments on this aspect – see Q14 for	Noted – the Council is in contact with statutory bodies and infrastructure providers to understand the impacts of development on current and planned infrastructure. This includes Leicestershire Police.
Group (SARG)	details	Draft Policy LP2 will help ensure that new development is designed in

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	Point 7: "reduction of anti-social behaviour" The Police are uninterested in controlling the nightly aspects of travelling on-street disturbances created by revellers associated with the University due to lack of resources, and no body with authority and/or responsibility has mitigated the occurrence of such disturbances over decades. So much so that anti-social behaviour reporting has almost entirely ceased for on-street disturbances as the reporting has had no effect over those decades, leading to gross report fatigue. There is no point in having this aspiration/objective if you don't control the relevant funding decisions that could address the issue. Point 8: "To assist our communities to have a sense of ownership and increased pride in their local areas due to strong neighbourhood planning. " is undermined by your policy of allowing large student blocks to be built off-campus without adequate Planning Control. That policy continues to undermine this aspiration, as it has done for the past 20 years.	such a way that it helps promote attractive and safe streets and contributes toward improving the quality of place and quality of life in the borough.
	The permitted developments at 192 & 194 Ashby Rd are prime examples, as are the continual planning applications for student blocks in the town centre. See comments in Q14.	
EDCLP/165 Dr S.J.Bullman	Your vision: "Our communities will have better access to jobs and services, with a choice to walk or cycle." Is missing one word. It should say SAFELY cycle – which it isn't at the moment. Cycle planning is piecemeal and currently vastly underfunded. This needs correcting. See also Q37. Also, your phrase "Our communities will have a sense of ownership and increased pride in their local areas due to strong neighbourhood planning." See point 8 below	Improving the sustainable transport offer across the borough is primary aim of the local plan. Draft Policy LP33 specifically identifies the provision of safe and attractive walking and cycling routes. The Council is in contact with statutory bodies and infrastructure providers to understand the impacts of development on current and planned infrastructure. This includes Leicestershire Police, West Leicestershire CCG, and Leicestershire Partnership NHS Trust. The effect of development proposals on infrastructure will be set out in the Council's Infrastructure Delivery Plan.
	Society: Point 4: "To promote health and well-being, in particular by ensuring that residents have access to health care" So why am I consistently sent to Leicester Royal Infirmary (by car	Draft Policy LP2 will help ensure that new development is designed in such a way that it helps promote attractive and safe streets and contributes toward improving the quality of place and quality of life in the borough.

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	14 miles & 40 minutes, nearest Park & ride no bus bus-hopper access to hospitals, other transport modes far worse) for low-level ear and eye problems when I used to get then attended at Loughborough hospital (0.3 miles, 7 minutes walk, 5 minutes by cycle). There is no point in having this aspiration/objective if you don't control the NHS funding decisions which dump their shortfall on to the patient.	
	Point 5: "managing the issues associated with houses in multiple occupation." I have multiple comments on this aspect – see Q14 for details	
	Point 7: "reduction of anti-social behaviour" The Police are uninterested in controlling the nightly aspects of travelling on-street disturbances created by revellers associated with the University due to lack of resources, and no body with authority and/or responsibility has mitigated the occurrence of such disturbances over decades. So much so that anti-social behaviour reporting has almost entirely ceased for on-street disturbances as the reporting has had no effect over those decades, leading to gross report fatigue. Again, there is no point in having this aspiration/objective if you don't control the relevant funding decisions that could address the issue.	
	Point 8: "To assist our communities to have a sense of ownership and increased pride in their local areas due to strong neighbourhood planning." is undermined by your policy of allowing large student blocks to be built off-campus without adequate Planning Control. That policy continues to undermine this aspiration, as it has done for the past 20 years. The permitted developments at 192 & 194 Ashby Rd are prime examples, as are the continual planning applications for student blocks in the town centre.	
EDCLP/176 Hannah Post Barton Willmore obo Michelmersh Brick Holdings	Paragraph 3.2 identifies key challenges in Charnwood which includes a growing population with a range of housing needs including specialist homes for older people, students and those unable to get onto the housing ladder. Furthermore, the Vision for Charnwood is set out and includes focusing housing development on Loughborough, the edge of Leicester and at Shepshed to	Noted – support is welcomed.

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EDCLP/188 Guy Longley	support its continued regeneration. Our Client supports this objective and their Site at Shepshed could deliver significant benefit to the area. The proposed Vision for Charnwood refers to the demand for housing being focused on Loughborough, the edge of Leicester	Noted – support is welcomed.
Pegasus on behalf of Taylor Wimpey Strategic Land	and Shepshed, with other communities having access to homes to suit their needs, including affordable housing in rural communities. The Vision as drafted does not refer to the important role development at Syston will play in helping to meet housing needs over the plan period. The Vision should be amended to make specific reference to planned areas of growth at Syston as an important component of the development strategy.	
EDCLP/205 Guy Longley Pegasus obo Davidsons	The proposed Vision for Charnwood refers to the demand for housing being focused on Loughborough, the edge of Leicester and Syston, with other communities having access to homes to suit their needs, including affordable housing in rural communities.	The objectives are intrinsically linked to actions that can achieve sustainable development, and are grouped by the main three components of the definition of sustainable development.
Development Ltd (Anstey)	The Vision as drafted does not properly recognise the role to be played in the strategy by the larger settlements including Anstey. The settlement is one of the larger sustainable settlements and	The policies in the draft local plan then link back to the objectives, with the concept that implementing the policies would also result in the Council meeting the objectives.
	functionally forms part of the wider Leicester urban area. The role played by the larger, more sustainable settlements in the strategy should be more clearly recognised in the Vision for the plan period.	As such, the objectives listed under the development strategy focus on the three main areas for growth. Together these three areas represent 83% of the planned growth. The vision and local plan recognise the Service Centres for the role they can fulfil in providing a balanced portfolio of sites across the borough to meet local needs.
	Whilst for the Society objectives there is reference to increasing access to a wide range of services for all people, there is no specific reference in the objectives to the need to ensure the provision of suitable education facilities to support future growth over the plan period. Paragraph 94 of the NPPF provides clear advice to local planning authorities that they should take a proactive, positive and collaborative approach to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities are required to give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications.	The objectives set out that the local plan will aim to increase access to a wide range of service and facilities for all people, having regard for their needs. This includes access to education. However, it is agreed that a stronger reference to education provision could be made in the vision and objectives. This will be reviewed before the plan is next consulted on.
	There are issues with the provision of school places in the Borough to support the proposed development strategy and the Council should have considered the opportunities to secure increased	

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	 provision, including the expansion of existing schools, as part of its development strategy. The Objectives should be amended to make specific reference to ensuring the provision of sufficient school spaces to meet the needs of existing and new communities and to support the future growth strategy of the plan. Davidsons Developments has interests in land to the south of Anstey where there is the potential as part of development proposals and the wider land holding to facilitate the expansion of Anstey Latimer Primary School. 	
EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold)	 The proposed Vision for Charnwood refers to the demand for housing being focused on Loughborough, the edge of Leicester and Syston, with other communities having access to homes to suit their needs, including affordable housing in rural communities. The Vision as drafted does not properly recognise the role to be played in the strategy by the Other Settlements, such as Wymeswold, whereby the proposed strategy directs some growth to Other Settlements to help meet future housing requirements over the plan period to 2036. The role played by these more sustainable rural settlements in the strategy should be more clearly recognised in the Vision for the plan period. The direction of some growth to the Other Settlements is consistent with paragraph 78 of the National Planning Policy Framework (NPPF) which advises that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, and that planning policies should identify opportunities for villages to grow and thrive. 	The objectives are intrinsically linked to actions that can achieve sustainable development, and are grouped by the main three components of the definition of sustainable development. The policies in the draft local plan then link back to the objectives, with the concept that implementing the policies would also result in the Council meeting the objectives. As such, the objectives listed under the development strategy focus on the three main areas for growth. Together these three areas represent 83% of the planned growth. The vision and local plan recognise the Other Settlements for the role they can fulfil in providing a balanced portfolio of sites across the borough to meet local needs.
EDCLP/207 Guy Longley Pegasus obo Davidsons Development Ltd	The proposed Vision for Charnwood refers to the demand for housing being focused on Loughborough, the edge of Leicester and Syston, with other communities having access to homes to suit their needs, including affordable housing in rural communities.	The objectives are intrinsically linked to actions that can achieve sustainable development, and are grouped by the main three components of the definition of sustainable development. The policies in the draft local plan then link back to the objectives, with
(Sileby)	The Vision as drafted does not properly recognise the role to be played in the strategy by the Service Centres of Anstey, Barrow Upon Soar, Mountsorrel, Quorn, Rothley and Sileby. These are the more sustainable larger settlements in the Soar and Wreake Valley corridors and the proposed strategy directs growth to them to help	the concept that implementing the policies would also result in the Council meeting the objectives.As such, the objectives listed under the development strategy focus on the three main areas for growth. Together these three areas represent

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	meet future housing requirements over the plan period to 2036. The role played by these larger, more sustainable rural centres in the strategy should be more clearly recognised in the Vision for the plan period.	83% of the planned growth. The vision and local plan recognise the Service Centres for the role they can fulfil in providing a balanced portfolio of sites across the borough to meet local needs.
	The Development Strategy objective at page 13 of the Draft Plan should also be amended to refer to some growth being directed towards the Service Centres as the more sustainable rural centres. Davidsons Developments Limited has interests in land at Peashill Farm, Sileby that has planning permission and is part of the committed residential development figure. There is the potential for some additional development within the committed site. The plan should support opportunities to make best use of committed housing sites for development.	
EDCLP/208 Guy Longley Pegasus obo Davidsons	Other than in relation to the Leicester Urban Area, the Vision does not consider the opportunity for development in sustainable locations within Charnwood adjoining settlements in neighbouring districts.	Noted – the Council is proactively working with neighbouring authorities to assess what opportunities (if any) there are to deliver sustainable growth.
Development Ltd (Field Head)	The plan should be reviewed to consider whether there are opportunities for sustainable growth in sites in Charnwood but well related to settlements in other districts. For Field Head, there are opportunities for growth that would offer a sustainable development solution well related to the range of services facilities in Markfield falling within Hinckley and Bosworth District.	This response will be used to inform the next phase of site assessment work, and will inform the next draft of the local plan.
EDCLP/209 Amy Smith Pegasus obo Jelsons	The proposed vision makes reference to the demand for housing being focused on Loughborough, the edge of Leicester and Shepshed to support its continued regeneration. The vision to focus development on Loughborough as the social,	Noted – support is welcomed. The Council acknowledge the submission of the alternative sites. These will be considered through the next phase of site assessment work and as part of the SHELAA.
	cultural and economic focus for the Borough is generally supported. We comment separately about the Draft Plan's proposed allocations in and around Loughborough and the failure to recognise the opportunity for sustainable growth to the east of Loughborough. We make further comments on the opportunities for development at Cotes (the Riggets Green development proposals), as part of these representations.	
EDCLP/216 Tom Collins Ninteen47 obo	Charnwood's Local Plan has a key role to play not only in ensuring that development needs are met, but also in pro-actively shaping the way in which Charnwood Borough will grow and develop in the	The Council is committed to meeting the objectively assessed housing needs of the borough.
Davidsons & Redrow	future. In this regard, a key priority must be to focus on increasing the quality and quantity of jobs within the Borough, and providing sufficient housing and infrastructure, in the right place and at the	The local housing need figure is calculated by taking account of the affordability of housing in the area. As such, meeting the housing needs figure is one mechanism to help stabilise the cost of housing.

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	right time, to support this economic growth. In addition, whilst the affordability ratio of 7.23 is set out in the Profile of Charnwood (page 8), the Vision should strive to reverse the long-term trend of worsening affordability which has led to this figure, by ensuring that affordable housing requirements are met in full.	Draft Policy LP4 is specifically drafted to help address issues of affordability in the borough, and to boost the supply of affordable homes.
	The evidence set out in the Housing and Economics Report accompanying these representations demonstrates that since 1998, annual job growth in Charnwood has consistently lagged behind growth figures within the Leicester and Leicestershire LEP, the East Midlands, and across Great Britain (paras $4.3 - 4.6$). At the same time, housing affordability has worsened (para 3.1), and the 65+ year old demographic group is now forecast to account for 46.5% of population growth over the period 2019 – 2029 (para 3.5).	
	For Charnwood Borough to deliver its vision and objectives, positive steps must be taken to address these unsustainable trends. As discussed in more detail below, pursuit of the current 'low growth' strategy not only lacks ambition in terms of housing delivery, but puts in real jeopardy the ability to meet needs of the future labour market.	
EDCLP/221 Nick Baker Lichfields on behalf of CEG	The Vision to 2036 is considered generally appropriate to guide a new local plan to 2036. In particular, references to the demand and focus for new housing development and the important role sustainable urban extensions (at West of Loughborough, Birstall and Thorpebury) will play in meeting this need is welcomed. The edge of the existing Leicester urban area continues to be the most sustainable location for development and the vision should therefore maintain this spatial approach.	Noted – support is welcomed.
EDCLP/224 Paul Newton	Development should be managed throughout the period to yield major improvements in sustainability. It is not clear to me why regeneration of Shepshed requires it to be a focus for housing demand, or how the proposed housing developments will contribute to regeneration.	Regenerating Shepshed is a corporate priority for the Council. The town is an important asset for the borough and housing-led regeneration offers the opportunity to maximise the town's existing strengths and tackle some long-standing issues.
	"Growth at Shepshed will support the Strategic Growth Plan's proposal for an International Gateway, secure regeneration that enhances the physical fabric of the town and makes the most of the forest environment."	The International Gateway is defined in the Leicester and Leicestershire Strategic Growth Plan. It is focused around the northern parts of the A42 and the M1, where there are major employment opportunities notably East Midlands Airport, East Midlands Gateway (strategic rail freight terminal) and HS2 station at Toton nearby.
	It is not clear to me what this means in plain English. I do not see how Shepshed plays any role in an "International Gateway".	

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CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
CONSULTEE EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	 3.2 The key challenges should also include reference to the reduction in biodiversity and fragmentation of habitats. A vision for Charnwood 2036 We applaud and support the visionary intent that 'development will have been managed to improve [] the environment. And we applaud and support the visionary intent that the 'biodiversity it contains will be in a good state' (though it will be important to provide a clear indication of what is meant by 'a good state' when referring to biodiversity). We support and applaud the intent that Charnwood will be recognised for its natural environment that people want to visit and explore. We request that these two clauses are separately treated here, though – there is a subtle but important distinction between being 'recognised for its natural environment that people want to visit and explore' and 'recognised for its natural environment that people want to visit and explore' and 'recognised for its natural environment that people want to visit and explore'. The vision of new parkland in Loughborough and Thurmaston is one that we welcome. 'The River Soar and River Wreake will be improved for wildlife' we welcome this and would like more information about what is meant by this. It would be good to see the reference to sustainable urban extensions being 'environmentally sustainable (since the undefined adjective 'sustainable' can refer to other forms of sustainability – which might not be environmentally sustainable). Shepshed – is referred to as having a 'forest environment'. Although the Charnwood Forest is called a forest, there are other important habitats that need to be remembered when considering this area and its landscape, the (internationally important) geology, outcrops, remnants of heathland and heath grassland. 'Woodland and forest character'. The geology and other habitats present within the Charnwood Forest also contribute to its character. These are sumarised below in a	Noted – protecting and enhancing biodiversity is an important priority for the Council. Draft Policy LP22 sets out the Council's detailed approach to biodiversity, including requiring development proposals to provide a measurable net gain in biodiversity, on-site in the first instance or through biodiversity offsetting where appropriate. The Council welcomes the proactive and considered comments against the various objectives, and the proposed amendments. These will be reviewed as part of preparing the next draft of the local plan.
	2009.	

REPRESENTATION SUMMARY

'Its Precambrian rocks and a landscape of craggy hilltops that is strikingly different to anywhere else in the lowland East Midlands define Charnwood Forest. The rocks, which are of volcanic origin, weather to produce poor, acid soils that until comparatively recently were very unattractive to farmers. The difficult terrain has contributed to the survival of substantially more biodiversity than elsewhere in Leicestershire. Trees and woodland, grassland (including heath, neutral and marsh) wetland (fast-flowing streams, man-made pools and reservoirs), rocks and built structures are the main wildlife habitats present.'

Charnwood will be well prepared..., particularly through its woodland and forest character of a mosaic of (internationally important) geology, outcrops, remnants of heathland and heath grassland

<u>Objectives</u>

We applaud and welcome the objective to require high environmental standards in new developments

We applaud and welcome the objective to promote health and wellbeing through access to green spaces and the countryside, though we would urge that a refining definition is given here to incorporate the importance of those parks, green spaces and countryside being wildlife-rich since the emerging research indicates that the health and wellbeing objective is better obtained through exposure to wildlife richness rather than just simple green (ie not built) space and 'green' countryside. (well-being benefits from natural environments rich in wildlife report)

Environment: Contributing to protecting and enhancing our natural, built and historic environment

3. To protect and enhance the range of habitats and species found in Charnwood, seek to deliver biodiversity gain and reverse habitat fragmentation and the recovery of our ecological networks (in line with NPPF and the Gov'ts 25-year plan, and the forthcoming UN decade of ecological restoration 2021-2030 post-Aichi). Whilst we applaud and support this objective we urge that it goes further and broader in order to help deliver the requirements to restore and enhance the biodiversity of the Charnwood area beyond the narrow but important tool of 'net gain' and the impact of 'habitat fragmentation' (protection, restoration and enhancement also

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	requires 'ecological re-connection, and more, bigger and better habitats, ecosystems and species populations, not just better- joined)'	
	5. To protect the special and distinctive qualities of all landscapes, maintaining local distinctiveness and sense of place, and paying special attention to impacts on Charnwood Forest, supporting the National Forest Strategy and tree planting throughout the Borough. Whilst we see the merits of tree planting in the right areas. We feel that the other important and fragile habitats within the Charnwood Forest require some attention in addition to tree planting described in this objective. Natural regeneration should be considered as an alternative to tree planting. In line with, The National Forest's current practice, tree planting should be done with care avoiding any sensitive habitats that would be destroyed if trees were planted on them.	
	8. To reduce the risk to people and properties from flooding, particularly in vulnerable locations such as parts of Loughborough and the villages of the Soar and Wreake Valleys. Natural Flood Management Schemes should be considered as a tool to alleviate flooding and allow the floodplain to function	
EDCLP/226 Eleanor Hood	Your vision and objectives do not seem realistic. To have such ideals and not deliver reduces people's confidence and trust in politicians.	Noted – the plan will include a monitoring framework that will ensure that there are ways in which the achievement of objectives can be measured. Performance against those measures will be published annually in an annual monitoring report.
EDCLP/230 Barbara Fisher	• Public transport is not specifically mentioned. If it is not mentioned, it will not get looked at when the flesh is put on the bones of the Draft Plan.	Promoting sustainable travel patterns, greater usage of public transport, and higher levels of active travel are integral parts of the draft local plan.
	 Bus, rail, cycle and foot paths come 7th in a list of 8 modes of transport – the only transport lower on this list is the National Cycle Route 6 (Shepshed to Watermead Park). 	Draft Policy LP33 sets out specific criteria to promote sustainable travel.
EDCLP/246 Andrew Collis Gladman Developments	<u>Vision</u> Though largely supportive of the overall thrust of the draft vision, it is considered that its length could be made more succinct if repetitiveness in wording in relation to the concentration of growth	Noted – The vision is the expected outcome from delivering the policies set out in the local plan. The vision is a corporately owned aim, signed off by the Council.
Ltd	at Loughborough is removed. This strategy is sufficiently captured by proposed objectives and subsequent Policies of the Local Plan.	The objectives are more intrinsically linked to actions that can achieve sustainable development, and are grouped by the main three components of the definition of sustainable development.
	Gladman is also concerned that part of the wording set out in the vision may be interpreted as policy. This is particularly the case	The policies in the draft local plan then link back to the objectives, with

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	where it is stated "the demand for housing will be focused on Loughborough to support its role as the social, cultural and economic focus for the Borough, the edge of Leicester to support the central city and at Shepshed to support its continued regeneration. This will include extensions at West of Loughborough, Birstall and Thurmaston, as well as other planned areas of growth, which will incorporate good quality design and reflect our strong local distinctiveness." The vision is not the appropriate location within the Local Plan for this wording and as such the vision should be revised. Gladman recommend that wording is revised to set out that growth "will have been" accommodated in this way.	the concept that implementing the policies would also result in the Council meeting the objectives. The preferred development strategy stems from the vision, as such it is an urban concentration and intensification strategy, with some growth dispersed to other areas.
	<u>Objectives</u> To ensure that the objectives of the Local Plan fully reflect the proposed spatial strategy, under the sub-heading "Development Strategy", Gladman consider that a fourth bullet point should be added to recognise the role played by and suitability of the sustainable villages of the Borough for accommodating a proportionate amount of new development. In addition, to ensure that the objectives of the Local Plan are fully responsive to national planning policy, it is considered that a fifth point relating to housing delivery should be added which sets out the need to ensure that sites identified are deliverable in a timely manner within the plan period with infrastructure and policy requirements applied.	
	• The remaining objectives for the Plan are thorough and considered to cover all relevant points for the Borough and are responsive to national planning policy. The arrangement and inclusion of objectives is purposeful by the Council in establishing how sustainable development is to be achieved and measured over the plan period. This however does not overcome the need to apply a policy confirming the implementation of the presumption in favour of sustainable development (see Section 9).	
EDCLP/254 Ian Deverell Turley on behalf of Rainier Developments Ltd)	 Rainier consider that the identified vision and objectives fail to recognise the strategic importance of the yet to be confirmed level of unmet housing need arising from Leicester City Council (LCC). One of the Growth Plan's four key matters is delivering new 	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be

CONSULTEE	housing. In this respect it considers two different scenarios, up to 2031 and 2036 (based on the jointly instructed HMA Housing	taken at the appropriate time, and formally confirmed through agreed
•	and Employment Development Needs Assessment) and from 2031 to 2050. For this period there is a 'notional' housing need of 90,500 dwellings. A recently published Statement of Common Ground (SoCG) (2019) between the Leicestershire Authorities to inform the North West Leicestershire Local Plan Partial Review (enclosed at Appendix 3), confirmed that: <i>"there remains a lack of clarity regarding the issue of unmet housing need in Leicester City, and how much need would be redistributed amongst the Leicester and Leicestershire authorities". (Paragraph 1.4)</i>	Statements of Common Ground.
•	Leicester has previously indicated in its Local Plan options and development management policies document (July 2017) that, based on the HEDNA, its shortfall could be as significant as 15,000 dwellings to 2031. A more up to date position should be identified in Leicester City's Local Plan Preferred Options, due to be published for consultation first quarter 2020. To reflect the Growth Plan, it would be logical for all the current	
	Local Plans being progressed to consider a consistent plan period. That way there would be no confusion as to what period Leicester's shortfall is being considered for.	
•	The SoCG currently being prepared could agree the relevant plan period and associated housing needs for all the authorities within the HMA similarly to the Memorandum of Understanding agreed between the Coventry and Worcestershire authorities (a copy is enclosed at Appendix 4). As required by NPPF paragraph 22, this period considered by the SoCG should be a minimum of 15 years from adoption of the last HMA plan.	
ide re wh a ur	Clearly, Leicester's significant unmet housing need should be dentified within the Vision as a key challenge for the plan to espond to through the duty to cooperate. This is significant issue which the HMA must collectively address. The shortfall represents housing need which exists now and to not recognise it, inderplays the urgency needed to address it, and fails to comply with the objectives of paragraph 60 of the NPPF. Rainier consider that the identified vision and objectives fail to	The Council is aware of L.City's unmet housing figure. The Council will

RESPONSE NO/ CONSULTEE		REPRESENTATION SUMMARY	OFFICER RESPONSE
lan Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	•	recognise the strategic importance of the yet to be confirmed level of unmet housing need arising from Leicester City Council (LCC). One of the Growth Plan's four key matters is delivering new housing. In this respect it considers two different scenarios, up to 2031 and 2036 (based on the jointly instructed HMA Housing and Employment Development Needs Assessment) and from 2031 to 2050. For this period there is a 'notional' housing need of 90,500 dwellings. A recently published Statement of Common Ground (SoCG) (2019) between the Leicestershire Authorities to inform the North West Leicestershire Local Plan Partial Review (enclosed at Appendix 3), confirmed that: <i>"there remains a lack of clarity regarding the issue of unmet housing need in Leicester City, and how much need would be redistributed amongst the Leicester and Leicestershire authorities". (Paragraph 1.4)</i>	be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
	•	Leicester has previously indicated in its Local Plan options and development management policies document (July 2017) that, based on the HEDNA, its shortfall could be as significant as 15,000 dwellings to 2031. A more up to date position should be identified in Leicester City's Local Plan Preferred Options, due to be published for consultation first quarter 2020.	
	•	To reflect the Growth Plan, it would be logical for all the current Local Plans being progressed to consider a consistent plan period. That way there would be no confusion as to what period Leicester's shortfall is being considered for.	
	•	The SoCG currently being prepared could agree the relevant plan period and associated housing needs for all the authorities within the HMA similarly to the Memorandum of Understanding agreed between the Coventry and Worcestershire authorities (a copy is enclosed at Appendix 4). As required by NPPF paragraph 22, this period considered by the SoCG should be a minimum of 15 years from adoption of the last HMA plan.	
		 Clearly, Leicester's significant unmet housing need should be identified within the Vision as a key challenge for the plan to respond to through the duty to cooperate. This is significant issue which the HMA must collectively address. 	

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	The shortfall represents a housing need which exists now and to not recognise it, underplays the urgency needed to address it, and fails to comply with the objectives of paragraph 60 of the NPPF.	
EDCLP/237 P.Williams	 Key challenges should include loss of biodiversity and how to reverse it. 	Noted – amending the key challenges to include biodiversity loss will be considered.
	 In the vision there should be targets about some of the changes e.g. there are figures on such things as current CO₂ per person - what will it be 2036? What will the ecological quality be of the rivers? How many journeys by foot and cycle etc? Overall given that the climate emergency has to be tackled how far will we be down the road of reaching zero carbon? 	The plan will include a monitoring framework that will ensure that there are ways in which the achievement of objectives can be measured. Performance against those measures will be published annually in an annual monitoring report.
EDCLP/231 CBC Neighbourhoods and Community Well Being	 Environment Item 5 – This needs to include reference to the creation of the Charnwood Forest Regional Park. 	Noted – the Council will consider adding a reference to the Charnwood Forest Regional Park in the next draft of the local plan.
EDCLP/192 Severn Trent Water	Severn Trent are generally supportive of vision, objectives based on the underlying principles behind a number of the Environmental objectives in particular point 7 which will look to improve surface water and groundwater quality, placing a greater emphasis on water as a resources that needs to be looked after. Point 8 which considers reducing the risk of flooding. Flooding is anticipated to become a greater problem as a result of climate change, and the management of surface water and protecting development from river water will need to be undertaken carefully, both of these elements have the potential to impact on the sewerage system. It is important that surface water is kept separate from foul sewerage wherever possible as this will result in a more resilient sewerage system.	Noted – support is welcomed.
	• We are also supportive of the principles to improve biodiversity and amenity, and acknowledge the benefits of multi-functional space, especially where natural surface water management can be undertaken through the use of SuDS systems.	
EDCLP/201 Sport England	Sport England supports the society and sports economy objectives.	Noted – support is welcomed.
EDCLP/182 Pegasus obo David Wilson	Chapter 3 sets out the proposed Vision for Charnwood, and states that the demand for housing will be focused on Loughborough, the edge of Leicester and Shepshed, with other communities having	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas.

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Homes	 access to homes to suit their needs, including affordable housing in rural communities. It is considered that the Vision as currently drafted does not adequately recognise the role of Other Settlements, such as Queniborough, whereby the proposed strategy directs some growth to these settlements to help meet future housing requirements over the plan period to 2036. Such settlements should be included within the Vision. The direction of some growth to the Other Settlements is consistent with paragraph 78 of the National Planning Policy Framework (NPPF), which advises that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, and that planning policies should identify opportunities for villages to grow and thrive. 	The objectives listed under the development strategy focus on the three main areas for growth. Together these three areas represent 83% of the planned growth. The vision and local plan recognise the Other Settlements for the role they can fulfil in providing a balanced portfolio of sites across the borough to meet local needs.
DCLP-425-470 Environment Agency	 We make the following comments: 3.2 Key challenges Final bullet point - climate change will not only increase flood risk. It is recommended that this section be expanded to also mention periods of water shortage (in line with current climate predictions). We also recommend that a bullet point should be added which highlights there could will be water quality and water quantity challenges/pressures. Regarding the former, the Water Framework Directive has a 'no deterioration' requirement which means that no environmental harm should result from the new/planned developments. Currently no waterbody within the borough is achieving 'good' overall status. A Vision For Charnwood 2036 The catchment approach is a key cornerstone of water management and we advice reference to it should be included in the Vision, for example by using the adding the following: "Charnwood will seek improvements to the water environment by supporting the catchment approach to water management and interventions such as natural flood management and making space for water." Reference to the two main rivers in the borough in paragraph 7 of 'A Vision for Charnwood 2036' is important, however this section 	The Council acknowledges the constructive comments on several issues. It is agreed that there are opportunities to amend and strengthen the vision and objectives in relation to water/flood risk/climate change. The proposed amendments will be reviewed whilst preparing the next draft of the local plan.

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	important role to play regarding wildlife, water quality and the issue of flooding. We also consider that the water environment is important enough to merit its own paragraph and that this section should include the following rephrasing: "The River Soar and River Wreake and their tributaries will be improved for both wildlife and people through sensitive development, reducing pollution and carrying out river restoration projects. We will work with nature to provide a more resilient response to climate change and associated flooding and will provide a more sustainable environment for all to enjoy. A regenerated Watermead area will bring environmental benefits to its surrounding communities and welcome visitors."	
	We consider that the wording in the second to last paragraph should be made more explicit and be reworded to: "Charnwood will be safe and resilient to the impacts of climate change and will be playing".	
	Environment: Contributing to protecting and enhancing our natural, built and historic environment:	
	We consider an eighth Point should be added as follows:	
	Point #. Limit the need for greenfield development by encouraging and supporting brownfield re-development.	
	Point 3. should refer to biodiversity net gain.	
	The wording of Point 7. should be extended to read: "To improve local air quality and protect and improve the quality and quantity of the water in the Borough's surface and groundwaters and in so doing achieving the Water Framework Directives targets and objectives. One way of improving water quality will be by encouraging and supporting brownfield development".	
EDCLP/ 245 Avison Young obo Loughborough University	The University supports the Vision for Charnwood and is pleased that the Borough Council has identified that the Science and Enterprise Park at Loughborough will play a crucial role in supporting the Council's objective of creating more employment opportunities for local people, including higher skilled, better paid jobs in the high technology research and manufacturing sectors.	Noted – support is welcomed.

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EDCLP/239 Jonathon Barratt- Peacock	In order to achieve this, development must be fairly distributed. Already the Service Centres have lost a lot of their character due to over development in recent years. Development needs to be concentrated on the smaller villages, hamlets and other settlements.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The Second Interim Sustainability Appraisal Report considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/239 Vivienne Barratt- Peacock	 Environment: "To protect and enhance the historic environment and the identity of the Borough's locally distinctive towns, villages and neighbourhoods." In order to achieve this, development must be fairly distributed. Already the Service Centres have lost a lot of their character due to over development in recent years. Rothley is hardly recognisable as the village it was when we moved here 13 years ago as it has grown by 70% in that short time. Development needs to be spread amongst the smaller villages and hamlets as well. These have been protected for many years and it is time that they shared the burden of development. Flooding: Much of the Soar Valley area comes to a standstill when it rains due to flooding. The road from the A6 into Barrow takes all of the traffic and queues reach back to the A6. This has been the case the majority of this Autumn and has made travel very difficult. New housing has exacerbated the problem. Flood defenses and roads need to be improved before more housing is built. In Rothley Wellsic Lane and Town Green Street flood regularly, ruining houses. What is supposed to be a once in 100 year event is now occurring many times in one year! The flood assessments are obviously very much outdated and need to be redone as they are currently unreliable as a source of information for planning developments. The new houses at Primrose Hill/ Baum Drive in Mountsorrel also flood internally, despite the balancing ponds and flood assessments completed when the estate was built very recently. 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The Second Interim Sustainability Appraisal Report considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the impact of new development on existing infrastructure. The Council is working with statutory providers and other infrastructure bodies to make sure that infrastructure is resilient and has the capacity to accommodate planned growth.
EDCLP/211 Cllr	3 Vision and Objectives	Regenerating Loughborough Town Centre is a primary aim of the draft

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Margaret Smidowicz	To respond to the demand for housing and employment land by focusing growth and to capitalise on its rich history and support the town centre to continue to be the main economic, social and cultural heart of the Borough and an attractive, compact and walkable destination for shopping, leisure, entertainment and culture; Loughborough Town Centre. What will it look like? Is the answer 'surrounded by high rise purpose-built flats and rooms with no parking. The umbers bolstered by apartments above shops, adapted to be safe and accessible and not occupied by families. (I support the inappropriate for families with young children aspect). We are now a childless town with fewer young families it seems. (15.58% under 15 years of age). As the spread of HMOs continues to move on from the town centre to the Kingfisher Estate and Nanpantan Ward the childless families are increasing in the very catchment areas that the schools serve. One school closure in Loughborough centre and more travelling into Mountfields and Holywell et al from further distances. Who is the target population that the Town Centre accommodation and the high-rise blocks will be catering for? Will it be 'students or young professionals or possibly elderly mobile individuals? If so, is it assumed that the majority of the above will not be bringing cars or travel out of town in cars? Will some of the ground floor housing blocks be adapted for the elderly who may not drive? If there is such a need why is one accommodation block going into liquidation? Q I support the adaptation of properties above shops and offices. Q How many PBSA do we currently have in place and why not more on Campus? Q How many bedroom spaces are planned for the different categories in the future? Will these contribute to the housing need statistics?	 local plan. Draft Policy 14 sets out the policy approach to regenerating the town and meeting the various needs of town centre users. The Council understand that there are concerns about those areas where there are significant concentrations of existing HMOs. The policy has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough. Furthermore, the evidence indicates that HMOs are meeting a certain component of local housing needs in the borough. As such, to have a restrictive policy framework as described would reduce the Council's ability to meet local needs, and likely to be found 'unsound' as a policy. Draft Policy LP9 sets out the policy approach to manage the impacts of HMOs, and Draft Policy LP10 sets out the requirements for supporting campus and purpose-built student accommodation.
EDCLP/195 Greg Hutton Davidsons Developments Ltd	The Vision Statement contained in the Draft Plan states that the demand for housing will be focused on Loughborough, the edge of Leicester and Syston, with other communities having access to homes to suit their needs, including affordable housing in rural communities. As currently drafted, the Vision does not properly recognise the role to be played in the strategy by the Other Settlements, such as	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The objectives listed under the development strategy focus on the three main areas for growth. Together these three areas represent 83% of the planned growth. The vision and local plan recognise the Other Settlements for the role they can fulfil in providing a balanced portfolio of sites across the borough to meet local needs.

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	Queinborough, where the proposed strategy directs some growth to help meet future housing requirements over the plan period to 2036.	
	The role played by these more sustainable rural settlements in the strategy should be more clearly recognised in the Vision for the plan period.	
	The direction of some growth to the Other Settlements is consistent with paragraph 78 of the National Planning Policy Framework (NPPF) which advises that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, and that planning policies should identify opportunities for villages to grow and thrive.	
EDCLP/193 Richard Webb	Given the environmentally conscious world that we inhabit there should be greater focus on how Charnwood can make a positive influence here rather than just being mindful of it. There should be a focus on green tech and transport and housing facilities should be judged and weighted more strongly against this. Housing policy for example should consider greenfield as a last resort after proving to the residents that all other options have been exhausted. Our vision should reflect that we are driving change and should have ambitions to be nationally recognised and acclaimed for our	Adapting to, and mitigating for, climate change is a corporate priority for Charnwood Borough Council.As noted in Paragraph 3.5 of the draft local plan, climate change is a cross-cutting theme which runs though the whole of the draft local plan.That being said, there are opportunities for the Council to be more proactive in responding to the climate change agenda. This response will be used to inform the next draft of the local plan.
EDCLP/204 Guy Longley Pegasu s obo Davidsons Development Ltd	positive work. The proposed Vision for Charnwood refers to the demand for housing being focused on Loughborough, the edge of Leicester and Syston, with other communities having access to homes to suit their needs, including affordable housing in rural communities.	Noted – the Service Centres fulfil a vital function within the borough – in terms of housing, services, facilities, and quality of life. The Council will consider whether their role and function should be made
(Rothley)	The Vision as drafted does not properly recognise the role to be played in the strategy by the Service Centres of Anstey, Barrow Upon Soar, Mountsorrel, Quorn, Rothley and Sileby. These are the more sustainable larger settlements in the Soar and Wreake Valley corridors and the proposed strategy directs growth to them to help meet future housing requirements over the plan period to 2036.	more prominent within the vision and objectives.
	The role played by these larger, more sustainable rural centres in the strategy should be more clearly recognised in the Vision for the plan period.	
	The Development Strategy objective at page 13 of the Draft Plan should also be amended to refer to some growth being directed	

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	towards the Service Centres as the more sustainable rural centres.	
	The direction of some growth to the Service Centres is consistent with paragraph 78 of the National Planning Policy Framework (NPPF) which advises that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, and that planning policies should identify opportunities for villages to grow and thrive.	
	Whilst for the Society objectives there is reference to increasing access to a wide range of services for all people, there is no specific reference in the objectives to the need to ensure the provision of suitable education facilities to support future growth over the plan period. Paragraph 94 of the NPPF provides clear advice to local planning authorities that they should take a proactive, positive and collaborative approach to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities are required to give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications.	
	There are issues with the provision of school places in the Borough to support the proposed development strategy and the Council should have considered the opportunities to secure increased provision, including the expansion of existing schools, as part of its development strategy. The Objectives should be amended to make specific reference to ensuring the provision of sufficient school spaces to meet the needs of existing and new communities and to support the future growth strategy of the plan.	
DCLP 265 Silver	Davidsons Developments has been working collaboratively with Leicestershire County Council as Education Authority and the Head of Rothley Primary School to bring forward proposals that would help deliver a much-needed extension to the school. We comment separately on the failure of the plan to recognise this opportunity and make an allocation for new housing and an extension to Rothley Primary School on land south of Farmers Way. Charnwood's Local Plan has a key role to play not only in ensuring	The draft local plan meets the objectively assessed housing needs of the
Fox obo Ms J &	that development needs are met, but also in pro-actively shaping	borough. The local housing need has been calculated via the Standard
Ms A Kimber	the way in which Charnwood Borough will grow and develop in the	Methodology, which includes a component that responds directly to the

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	future. In this regard, a key priority must be to focus on increasing the quality and quantity of jobs within the Borough, and providing sufficient housing and infrastructure, in the right place and at the right time, to support this economic growth. In addition, the Vision must seek to reverse the long-term trend of worsening affordability by ensuring that affordable housing requirements are met in full. 2.2.2 In this regard for Charnwood Borough to deliver its vision and	issue of housing affordability. As such, the proposed housing growth figure will be working towards tackling affordability issues.
	objectives, a positive approach must be taken to address these clear and real unsustainable trends. Accordingly, the Council's pursuit of its current 'low growth' strategy informing the emerging Local Plan lacks real ambition in terms of housing delivery and puts in real jeopardy the ability to meet needs of the future labour market.	
DCLP 266 Leicester City Council	The City Council supports the development strategy and the objectives for the development strategy, but notes that housing and employment growth on the edge of Leicester may lead to additional pressure on services and facilities within the City and that such pressure would require mitigation.	The Council acknowledges the impact that new development can have on infrastructure and services. These impacts have been considered as part of the site assessment work. The Council is also preparing an IDP, which will document the impacts on current infrastructure and set out proposals for infrastructure improvements. The Council would welcome the opportunity to liaise with L.City to
DCLP/261 Edward Argar MP	I welcome the recognition in the vision of the need to maintain the character of our towns and villages, and believe that avoiding over- development and maintaining agricultural/rural areas, and areas of separation between settlements is essential to achieve this.	discuss any concerns over impacts on services and infrastructure. Noted – Draft Policy LP19 is worded to protect the identified areas of local separation.
DCLP/260 National Forest Philip Metcalfe	The National Planning Policy Framework states that 'the planning system should support the transition to a low carbon future in a changing climate' and that 'it should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions'. The NFC is concerned that the proposed plan will not contribute to radical reductions in greenhouse gas emissions.	Noted – planning for a low carbon future, responding to the challenge
	The Vision for Charnwood 2036, from page 11 onwards still retains a focus on growth and economic development. Climate change is not mentioned until the penultimate paragraph where it states:	
	Our communities will enjoy a cleaner and greener environment. Charnwood will be well prepared for the impacts of climate change and will be playing its part in reducing greenhouse gas emissions, particularly through its woodland and forest character.	

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	The NFC considers that this is not ambitious enough. In line with its Climate Change Strategy 2018-22, the Borough Council should be doing more than playing its part, it should be looking to take a lead in reducing carbon emissions either directly through its own actions or indirectly through the influence of policy such as the Local Plan.	
	The Council's actions to address carbon emissions will need to extend much further than relying on existing woodlands and forest character. These will sequester small amounts of carbon compared to the emissions of the Council and The Borough as a whole. The wording within the vision suggests that existing woodland and forest character will be the Borough's main method of climate change mitigation which is unacceptable.	
	The Local Plan vision makes no reference to the National Forest.	
	Over the timeframe of the Local Plan, delivery of the National Forest vision will not only see the planting of 4 million more trees but the move towards an exemplar of low carbon living. The Local Plan vision should also refer to the significant changes that will be required to deliver carbon reductions of scale over this period.	
	The objectives of the Local Plan as set out from page13 onwards are also unambitious in their proposals with regard to achieving a balance between the need for development and ensuring this has a positive impact on both the environment and society.	
	The environmental objectives focus on protecting and enhancing. The NFC considers that the objectives should also seek to extend valuable habitats so that the natural environment grows in line with the growth of the built environment. If the natural environment is to continue to provide natural capital to a growing population then the capacity of the natural environment also needs to expand. This cannot be achieved simply though protecting and enhancing but also through policies which require new habitat creation.	
EDCLP/174	Support	Noted – support is welcomed
Kimberley Brown Carter Jonas obo	The vision and objectives identified in the draft plan are supported. In particular, the development strategy identified by the Council	
Taylor Wimpey	focusing new development in Loughborough and the edge of	
Homes	Leicester is agreed with. These are sustainable locations for new development which already have a range of services and facilities,	

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	REPRESENTATION SUMMARY employment opportunities and public transport infrastructure in place. The provision of new homes within these areas will support these existing facilities whilst also providing opportunities to improve these and increase the range and availability of services to existing communities. This also reflects the Strategic Growth Plan for Leicester and Leicestershire (2018) which illustrates the A46 Priority Growth Corridor wrapping to the east and north east of Leicester. The vision and objectives of the draft plan are therefore considered to accord with the requirements of the National Planning Policy Framework (NPPF) to contribute to the achievement of sustainable development (paragraph 7). The proposed Vision for Charnwood refers to the demand for housing being focused on Loughborough, the edge of Leicester and Syston, with other communities having access to homes to suit their needs, including affordable housing in rural communities. The Vision as drafted does not properly recognise the role to be played in the strategy by the Service Centres of Anstey, Barrow Upon Soar, Mountsorrel, Quorn, Rothley and Sileby. These are the more sustainable larger settlements in the Soar and Wreake Valley corridors and the proposed strategy directs growth to them to help meet future housing requirements over the plan period to 2036. The role played by these larger, more sustainable rural centres in the strategy should be more clearly recognised in the Vision for the plan period.	OFFICER RESPONSE Noted – the Service Centres fulfil a vital function within the borough – in terms of housing, services, facilities, and quality of life. The Council will consider whether their role and function should be made more prominent within the vision and objectives. The Council acknowledges the submission of Land at Seagrave Road, Sileby. This site will be considered in drafting the version of the local plan, and will be assessed as part of the SHELAA.
	The Development Strategy objective at page 13 of the Draft Plan should also be amended to refer to some growth being directed towards the Service Centres as the more sustainable rural centres.	
	Hallam Land Management has interests in land at Seagrave Road Sileby that has planning permission and is part of the committed residential development figure. There is the potential for some additional development within the committed site. The plan should support opportunities to make best use of committed housing sites for development.	
EDCLP/252 Leicestershire	Key Challenges - there is not just the challenge from the impacts of climate change there is also the challenge of taking the actions	Noted – the Council believes that the draft local plan provides a policy framework to adapt to, and mitigate from, the impacts of climate change.
LEICE3161311116	53	namework to adapt to, and mitigate norm, the impacts of climate change.

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County Council	needed to avoid the worst effects of climate change (ie, by reducing emissions, increasing carbon sequestration etc) by reducing energy demand, changing to renewable forms of energy, low / zero carbon transport / mobility solutions, increasing energy efficiency etc. Addressing this challenge will reduce the need to put time, money and effort into dealing with the impacts of climate change. Taking action on this should also create new economic and employment opportunities for the area. Plan needs to reference the full challenge of climate change.	
EDCLP/252 Leicestershire County Council	Vision – 'Development will have been managed to improve the economy, quality of life and the environment.' Putting the environment last can imply that it is the least important of the list. Increasing recognition that unless we address the environmental issues (climate change, biodiversity loss, resource scarcity) there won't be an economy to develop or much in the way of a quality of life. If CBC has declared a climate emergency, then it would make sense to put this at the fore of the vision.	Noted – the Council is proactively responding to the challenge of climate change. As set out in Paragraph 3.5 of the draft local plan, climate change is a cross-cutting theme that runs through all aspects of the plan.
EDCLP/252 Leicestershire County Council	Vision - delivering growth to a high design quality that benefits our communities.' May be picked up elsewhere but could include reference to low/zero carbon, more environmentally sustainable development. Or add 'that benefits our communities and the environment.'	 Noted – facilitating sustainable development, which is of a high quality and makes a positive contribution to the borough is a primary aim of the draft local plan. In particular, Draft Policy LP30 sets out the policy requirements for achieving sustainable construction; and Draft Policy LP2 sets out the policy requirements for delivering high quality design.
	Also opportunity when talking about the types of homes to reference that all new homes will be low carbon in line with forthcoming Future Homes Standard and proposed changes to the NPPF.	
EDCLP/252 Leicestershire County Council	Change the sentence to 'Regeneration capitalises on industrial heritage including the Great Central Railway and the Grand Union Canal'	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
EDCLP/252 Leicestershire County Council	Vision – planting trees will only have a small effect on reducing Charnwood's GHG emissions. Will need more fundamental changes to local economy, energy systems, housing, transport and industry. Bit disingenuous to imply that it can be particularly addressed by planting trees and maintaining woodlands.	Noted – tackling climate change is a cross-cutting theme which runs through the entire local plan and each policy.
EDCLP/252 Leicestershire County Council	Development Strategy – opportunity to mention Ultra Low and Low carbon transport / mobility solutions.	Noted – improve the sustainable transport offer in the borough is central to Draft Policy LP33. The policy promotes all forms of low carbon travel and mobility.
EDCLP/252	Development Strategy – will need to go beyond 'seeking high	The exact design parameters of new buildings will be guided by Draft

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Leicestershire County Council	environmental standards in new development' – will need to require it – at least to level of Future Homes Standard and future NPPF.	Policy LP2 and the current Build Regulation standards.
EDCLP/252 Leicestershire County Council	Next to attractive opportunity to mention the word 'green'. This would cover aspirations to ensure that the town is green, addresses any considerations of air quality and opportunities for biodiversity and combat climate change such as the likelihood of urban heating and flooding.	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
EDCLP/252 Leicestershire County Council	Society – doesn't make reference to the health impacts from pollution caused by vehicles, housing, businesses and industry – addressing pollution should also be crucial for supporting healthy communities.	Noted – promoting good health and well-being is referenced in the objective section.
EDCLP/252 Leicestershire County Council	Add improve permeability of landscape for species.	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
EDCLP/252 Leicestershire County Council	Environment – is it enough to just 'seek to deliver biodiversity gain'? It is a legal requirement of development	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
EDCLP/252 Leicestershire County Council	Economy – possible opportunity to make reference to 'green / low carbon industry' as a sector to encourage in the area	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
EDCLP/252 Leicestershire County Council	Item 5 add in the word 'appropriate' tree planting	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
EDCLP/252 Leicestershire County Council	Item 6 protect the Borough's soil resources by encouraging appropriate management of soil by encouraging biodiverse landscapes in new development and management of land such as open spaces.	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
EDCLP/252 Leicestershire County Council	Economy: Helping build a strong responsive and competitive economy. Item 3 'green	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
EDCLP/252 Leicestershire County Council	The scattered and relatively small-scale nature of the development locations around the borough means that it will be especially important for the local plan to have strong policies around the	Noted – proposed amendments will be reviewed as part of drafting the next version of the local plan.
[Transport Strategy]	identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives.	The Council is working directly with LCC on Transport Modelling work and a Sustainable Transport Study. As such, LCC will be well-placed to advise on the impacts and mitigation required on the transport network.
	The Vision refers to "…excellent connections by bus…". This, along with any other references to bus services (or similar) throughout the document (e.g. within draft policy LP33), should be widened out to refer more generally to "passenger transport" to reflect the County Council's Passenger Transport Policy and Strategy (PTPS). The	

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EDCLP/252 Leicestershire County Council [WASTE]	distinction is important given that the PTPS recognises the increasing financial challenges of supporting non-commercial, traditional bus services and the need for alternative solutions such as demand responsive transport or community initiatives. In response to point 1 it is felt that there should be reference to the reduction of waste in addition to the minimisation and recycling of waste. In line with the revised waste hierarchy of 2008, prevention should be given the greatest priority.	Noted – this response will be used as an input to the next draft of the local plan.
EDCLP/252 Leicestershire County Council [Strategic Property]	Vision and Objectives The vision and objectives are generally welcomed and show strong links with the Strategic Growth Plan and the County Council's Strategic Plan 2018 – 22. However, the Development Strategy at Paragraph 1 could be expanded by the following addition, namely, "to maintain the role of Service Centres as vibrant sustainable communities by the allocation of appropriate levels of new development".	Noted – this response will be used as an input to the next draft of the local plan.
EDCLP/252 Leicestershire County Council	With regard to the vision 'environment' needs to be placed higher, at the forefront of the vision. There is an increasing recognition that unless environmental issues (climate change, biodiversity loss, resource scarcity) are addressed there will not be a strong economy or much in the way of a quality of life. As such, Charnwood Borough is advised to move 'environment' to the fore.	Adapting to, and mitigating against, climate change is one of the primary aims of the draft local plan.
EDCLP/272 Centre for Sustainable Energy via Cllr Needham	The Vision and Objectives within the plan should be updated to incorporate reference to the 2050 commitment to become net zero carbon by 2050, and to the implications for planning within your district, which are extremely significant. It should also summarise the duties around carbon auditing and budgeting early and prominently within the plan, to set the context for the policies which follow. The commitment to reduce emissions to nothing within 30 years needs to influence all policies, and all policies should be assessed for compliance against this overarching objective. The Greater Manchester Spatial Framework approaches this well, page 76 – 78 and Policy GM-S 2, though Greater Manchester are committed to carbon neutrality ahead of the 2050 deadline, in line with their Climate Emergency Resolution. This is based on analysis carried out by the Tyndall Institute which considers baseline emissions and sets a carbon budget in line with the Paris Climate Accord, and a 2038 target for carbon neutrality. <u>www.research.manchester.ac.uk/portal/files/83000155/</u> Tyndall_Quantifying_Paris_for_Manchester_Report_ FINAL_PUBLISHED_rev1.pdf	 Noted – the Council has made responding to climate change a corporate priority. As noted in Paragraph 3.5 of the draft local plan, climate change is a cross-cutting issue that influences the entire plan and the whole policy framework. The proposals set out in this response will be used as an input in preparing the next draft of the local plan.

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EDCLP/276 Pegasus obo Wilson Enterprises	The proposed Vision for Charnwood refers to the demand for housing being focused on Loughborough, the edge of Leicester and Syston, with other communities having access to homes to suit their needs, including affordable housing in rural communities. For potential development opportunities on the edge of Leicester, the Draft Plan focuses development on brownfield sites within	Noted – support is welcomed.
	Birstall, Syston and Thurmaston along with greenfield sites on the edge of Syston, Glenfield, and Thurmaston. There are also opportunities on the edge of Leicester adjoining smaller settlements that provide sustainable opportunities for housing development that should be considered for allocation. Wilson Enterprises has interests in land to the east of Thurcaston	
	which offers the opportunity for sustainable development well related to the Leicester urban area.	
EDCLP/277 RPS obo Bellway Homes	Bellway welcome and agree with your approach for planned areas of growth to incorporate high quality design, strong local distinctiveness and affordable housing, especially in respect of the Sustainable Urban Extensions (SUE) at Thurmaston, North-East of Leicester (where there is planning permission for 4,500 homes), a saved policy (LP 2004) and from the Core Strategy (2015), outlining a housing supply requirement of 3,325 homes, and proposed adjacent sites and allocations.	The Council considers that it has identified a broad range of sites, including the SUEs, as well as medium and small-scale sites. It is considered that this provides sufficient flexibility to meet the short-term and long-term needs of the borough.
	Bellway support your preferred development strategy that aims to direct housing development to locations that provide access to jobs, infrastructure and sustainable travel options, these being sites in Loughborough and on the edge of Leicester. This infrastructure- led approach is pragmatic in meeting the needs for housing, employment and retail. Whilst we welcome this overall approach, there are elements that give us cause for concern, such as the continued focus / over reliance on the delivery of the 3no. large SUEs, which in our opinion needs to be addressed.	
	A more balanced and broad approach that considers short term deliverability should also be part of the development strategy where smaller more deliverable non-strategic sites rather than the larger allocated sites which take some time in coming forward, are considered. This is recognised in paragraph 4.13 where long term build out rates of large sites have the potential to change due to unforeseen circumstances, and the 5-year land supply 2019-2024	

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EDCLP/211 Cllr Margaret Smidowicz	 background information outlining anticipated delivery and completion rates. The Council's Housing Delivery Study (Dec 2017) identifies at para 1.7 that 'a shortfall in short term land supply within the Borough, primarily due to the lead in times associated with bringing forward large sites.' Without intervention, it continues, this will remain an issue until the 'mid to late 2020s'. We believe that, in accordance with the NPPF (para.59) and having regard to sluggish delivery rates exhibited from the existing SUEs allocated in the 2015 Core Strategy, the objective of the new Local Plan should be revised to commit to significantly boost the supply of housing by focusing housing growth within a broad range of sites within Loughborough, edge of Leicester and Shepshed. I welcome the statement that this is a 'Draft Local Plan and appreciate the effort Officers have taken to engage with residents. "We are all also the custodians of our Borough for future generations". Yes, indeed. I wish this statement had been made forty years' ago and perhaps much of the Heritage would have been preserved and balanced communities would have emerged. As it is, we are faced with trying to conserve what we have left and incorporate it into a future which does not detract further from our sense of "Place" as a Borough and significantly Loughborough, a significant market town 	Noted – support is welcomed. Protecting and enhancing the historic environment is a priority for the draft local plan. Draft Policy LP24 sets out the Council's approach to conserving and enhancing the borough's heritage assets.
	recognised in 1221, with a university established in 1909, now a University Town with a market place. Whole areas of Loughborough would not be so identifiable as less attractive areas and more attractive for first time buyers than they are now. Unique in that we are a town not a city. Vital that we continue with a unique sense of place and not a clone of others.	
	Development Strategy	
	ee that we should pursue a low growth rather than a high growth s	
DCLP/16 Dr Catharine Ferraby	Yes	Noted – support for the policy is welcome.
DCLP/87 Mr Dennis Marchant	The policy is supported.	Noted – support for the policy is welcome.
DCLP/131 Mr Martin Peters	Considers that the growth and expansion of the visitor economy should be directly referenced in the Development Strategy; and Suggests that visitor economy could be improved through specific	More specific measures to enhance and improve the visitor economy are referenced in Chapters 6 and 7 of the draft local plan. However, it may be beneficial to include a specific reference in Chapter 4 to provide a link to

measures, including: new/expanded accommodation, increasing capacity at visitor attractions, and increased parking capacity.	other policies and proposals.
capacity at honor attractione, and more acoust parting capacity.	
 Concerns raised due to lack of infrastructure provision to support proposed growth; Outlines that Leicester City Council has no Local Plan, and has not yet identified the quantum of 'unmet need'; Suggests that the Strategic Growth Plan has unfairly allocated the expected unmet need, and that this cannot be confirmed without a series of Statements of Common Ground; Suggests that Charnwood must take a fair share of the unmet need, when known; and Concerned that the SGP has not considered all options, and that alternatives (particularly alternatives to the A46 proposal) exist. 	Local Housing Need, derived from the Standard Methodology, has established the housing requirement for Charnwood. Necessary infrastructure to support this growth has been assessed as part of the Local Plan evidence base, and policies catering to infrastructure provision are noted in Chapter 9 of the draft local plan. Further discussions will take place with all statutory infrastructure providers as the local plan progresses through the statutory process. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
 I favour lower growth to minimise environmental impact and traffic congestion. 	Noted – the growth scenarios are supported by both transport and environmental impact assessments.
 I agree that the Council should pursue a low growth scenario. 	Noted – support is welcomed.
 Yes. No growth would be ideal so low growth is a better option than anything more. 	Noted – growth figure represents Charnwood's Local Housing Need, derived from the Standard Methodology.
 Concern that proposed housing growth is lower than previously stated, and that a larger "buffer" should be included; Larger buffer would ensure a five-year housing land supply, and lessen reliance on large-scale SUEs; Delivery of SUEs is likely to take longer and annual delivery rates are likely to be lower than expected – and current delivery rates are overly optimistic; Outlines that Leicester City Council has not yet identified the quantum of 'unmet need'; Charnwood should use local plan-making process to address shortfall in housing deliver in HMA and bring certainty to shortfall in Leicester City. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. Proposals for the Birstall SUE are supported by a SoCG between the
	 Outlines that Leicester City Council has no Local Plan, and has not yet identified the quantum of 'unmet need'; Suggests that the Strategic Growth Plan has unfairly allocated the expected unmet need, and that this cannot be confirmed without a series of Statements of Common Ground; Suggests that Charnwood must take a fair share of the unmet need, when known; and Concerned that the SGP has not considered all options, and that alternatives (particularly alternatives to the A46 proposal) exist. I favour lower growth to minimise environmental impact and traffic congestion. I agree that the Council should pursue a low growth scenario. Yes. No growth would be ideal so low growth is a better option than anything more. Concern that proposed housing growth is lower than previously stated, and that a larger "buffer" should be included; Larger buffer would ensure a five-year housing land supply, and lessen reliance on large-scale SUEs; Delivery of SUEs is likely to take longer and annual delivery rates are oikely to be lower than expected – and current delivery rates are overly optimistic; Outlines that Leicester City Council has not yet identified the quantum of 'unmet need';

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		based upon the detailed analysis carried out by the promoter and the Council. This information provides the Council with the confidence that the SUE can be delivered as planned. Policy LP36 provides further detail on the SUE will proceed, including requirements for a Development Framework, that will include 'delivery and phasing arrangements'. The Council is aware of Leicester City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
DCLP/280 Harborough District Council	• The need for flexibility is supported. However, the scale of the flexibility allowance should be kept under review to ensure it reflects the latest agreement on the distribution of housing need across the Housing Market Area (as evidenced through the forthcoming Statement of Common Ground). (Officer comment)	Ongoing discussions (with Leicester City and other strategic policy- making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground
DCLP/301 Mr Phil Sheppard	• I support a low growth rather than a high growth strategy.	Noted – support is welcome
DCLP/305 County Councillor Max Hunt	 Several contributors make reference to the Draft Plan's failure to address the unmet need currently quoted for our neighbours in the city of Leicester. There is also no reference to a Statement of Common Ground. Were these to be considered within the Plan a change in the figures presented and a review of the strategy is likely to be required. 	Ongoing discussions (with Leicester .City and other strategic policy- making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground
DCLP/325 Mrs Alison Lawton-Devine	 I agree we should pursue a low growth strategy. What the document doesn't suggest is bringing empty properties back into use and converting old industrial buildings into low cost accommodation in and around Loughborough. This will generate homes, without the reliance on green field sites. 	 The Council agrees that bringing empty homes back in to use should feature as part of the overall housing strategy for the area. The amount of empty homes in the borough is small in comparison to the overall dwelling stock. The number of empty homes has remained relatively static; and, in fact, the number of "long term" empty homes has steadily reduced over time since 2010. Bringing empty homes back into use is a Corporate priority and the local plan will reflect the Council's ambitions.
DCLP/333 Sturdee Poultry	 The proposed level of growth in the draft local plan has not been tested by the Sustainability Appraisal; 	The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be

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Farms Ltd	 The Sustainability Appraisal has a Low Growth Scenario of 8,100; whereas the local plan shows a minimum of 5,930 under the Standard Methodology – even with the additional 1,3000 dwellings this is 848 fewer than tested under the Sustainability Appraisal; and Only two growth scenarios have been tested and these vary widely. It is, therefore, impossible to determine if there is a scenario between the two options. As such, reasonable alternatives have not been assessed. 	found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments. As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are considered to represent an appraisal of reasonable alternatives.
		 The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
DCLP/347 Mr John Barton	 What types of housing will be delivered – will they be affordable / suitable for an aging population? How will the towns have lower environmental impact – proposals should include more active transport. 	The type, mix, and tenure of future housing growth is LP2, LP4, LP6, LP7, and LP8. The Council agrees that these aspects as equally as important as the delivery of the overall Local Housing Need figure. The Council is working alongside Leicestershire County Council to develop policies in the local plan that deliver sustainable transport infrastructure, including active travel measures.
DCLP/388 Dr Martin Field	 'Growth' should be sought in relation to the levels desired by local communities within the Borough area - it is likely that not all local communities will have the same aspiration for local growth. Additional surveys are required to make this position more tangible so as not to merely adopt 'a one size fits all' approach'. 	The Council is taking a proactive approach to community engagement. Feedback on growth options and housing sites will shape the final version of the local plan. The evidence base prepared to inform the draft local plan takes account of local issue, constraints and opportunities. Furthermore, the SA considers the potential impacts of growth on locations across the borough. Utilising this evidence will allow the most appropriate growth strategy to be prepared, taking account of local circumstance, and
DCLP/404 Mr Martin Smith	 I agree, in light of a climate emergency, that a low growth scenario should be pursued 	avoiding a one-size fits all model. Noted – support is welcomed.
LDCLP/02 Anonymous	• Yes	Noted – support is welcomed.
LDCLP/15 Anonymous	Yes definitely	Noted – support is welcomed.

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LDCLP/22 Anonymous	• Yes	Noted – support is welcomed.
LDCLP/34 Anonymous	 Facilities must match the growth rate – be those facilities, education, healthcare, recreation or transport. 	Infrastructure requirements to support new development have been determined in conjunction with the statutory authorities. Further evidence will be prepared to inform final development strategy.
LDCLP/51 Anonymous	 Most definitely and use on already brownfield & built on land regenerated & developed <u>FIRST</u> 	The overall strategy for growth is one of urban concentration and intensification. Policy LP1 specifically identifies making the efficient use of land including brownfield or underused land and buildings. The Council maintains a Brownfield Land Register that is used to ensure brownfield sites can be easily identified and come forward for development.
EDCLP/06 Elaine Carter	 I live in SE Leicestershire and it surprises and saddens me to see that Charnwood local plan supports the expressway, which is an unwanted and unnecessary motorway which would scar East Leicestershire. I understand the local plan is committed to green issues, reducing pollution and protecting the countryside, so supporting the Expressway is at variance with these commitments. 	The proposed Expressway is set out in the Strategic Growth Plan for Leicester and Leicestershire. Any final proposals will be delivered by Leicestershire County Council.
EDCLP/55 Sileby Parish Council	 The local plan does not identify strategic policies; Current draft policies are both strategic and non-strategic, and this is a weakness of the plan; Non-strategic policies need to be clearly identified so that the relationship with Neighbourhood Plans is clear, and there is no uncertainty between the roles of the local plan and the Neighbourhood Plan. The draft local plan does not identify a specific housing requirement for Sileby; As it stands, the draft local plan conflicts with the NPPF, in so far as the requirement for strategic policies to identify housing need within designated neighbourhood areas – the draft local plan should identify a target specifically for the Sileby Neighbourhood Area; The SGP is not listed as part of the evidence base used to inform the draft local plan; There appears to be no justification for allocating an additional 309 dwellings at Sileby, the majority of which is concentrated in one large site in the countryside, outside the Limits of Development recently established in the Sileby Neighbourhood Plan. 	 Strategic policies are already identified in the draft local plan – but, as the draft local plan is finalised, the strategic policies will be revised and clearly identified in the plan. The draft local plan identifies Sileby as a Service Centre (along with five other settlements) and sets out a development strategy for 2,490 additional homes over the plan period. This figure has been determined based upon an optimal balance of social, environmental, and economic factors – demonstrated through the appraisal of potential growth scenarios set out in the Sustainability Appraisal. In order to provide greater specificity for development proposals in Sileby, draft local plan Policy LP3 currently sets out six housing sites in Sileby. These sites total 309 additional homes. These sites have been determined via the Council's evidence base.
EDCLP/59 Anonymous	 I strongly endorse the 'low growth scenario' (p.19) favoured in the draft Plan and would urge that this remains the resolve of the Borough Council. Deviation from this will 	Noted – support is welcomed.

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EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	 almost certainly compromise the delivery of the overall vision and strategic objectives set out in the Plan. Charnwood Borough Council should not adopt a low growth strategy based on a net requirement to identify land for 5,930 new homes with 1,300 additional new homes. Charnwood should adopt a high growth strategy for the following reasons: migration is likely to remain high, and there will be a requirement for Charnwood to meet some of Leicester City's unmet housing need. Should Charnwood have to take say 25% of Leicester City's unmet housing need, then the total additional requirement would need to increase from 7,252 to around 11,000. Most of this additional supply should be met on sites adjoining the main built up urban area of Leicester City/within and adjoining Service centres located close to Leicester. 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/65 Mr W Leek	1. Yes	Noted – support is welcomed.
EDCLP/74 Mr Hussain	 There should be no growth in terms of social housing <i>new</i> <i>builds</i> & out-dated tenancy models that offer no incentives or actual progression for the advancement of human beings. 	Future housing growth is important to improve the quality of life and economy within Charnwood.
EDCLP/80 Historic England	 Although not specifically commenting on low or high growth, heritage assets and their settings must be considered in relation to all proposed growth. 	Preserving and enhancing heritage and the built environment is of paramount importance to the Council. Draft local plan policies LP24, LP27, LP29, and LP30 work towards these aims.
EDCLP/83 Berrys on behalf of Moss Solicitors	 Concerned that the low growth strategy could result in an inability to demonstrate a five-year housing land supply later in the plan period; Land at 83 ('Northfield') and 87 Cotes Road, Barrow upon Soar Support is proposed for allocation in the draft local plan; It is considered that the Local Plan is not legally compliant or sound, particularly with regard to whether it is being positively prepared, or is justified, effective or consistent with national planning policy due to the failure to allocate land for housing or 	The draft plan responds to the Local Housing Need figure, as defined by the Standard Methodology. The policies seek to deliver this figure, plus an additional 1,300 homes to provide flexibility and resilience to the supply. As such, it is not accepted that the proposed approach will result in a lack of a five-year housing land supply later in the plan period. Several sites in Barrow upon Soar have been considered and appraised through the SHLAA and the SA. This has led to the current strategy and policy approach in the draft local plan.

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	as a residential-led mixed-use scheme at 83 ('Northfield') and 87 Cotes Road, Barrow upon Soar.	The sites proposed will be included in the SHLAA and considered as part of the evidence base.
EDCLP/107 Rosconn Strategic Land	 The Housing and Economic Needs Assessment chapter of the PPG highlights that the standard method for assessing local housing need is a starting point in determining the number of homes that are needed in an area, and that there will be circumstances in which it is appropriate to consider whether housing need is higher than the standard method indicates; Previous studies indicated the risks associated with the low growth scenario – risk including: a lack of flexibility in the supply of land, that the Local Plan could become out of date, and the Local Plan not significantly boosting the supply of housing and therefore lack compliance with the NPPF. NPPF and PPG refer to the publication of indicative housing trajectories as evidence to inform strategic policies. An objection is therefore raised due to the absence of a trajectory. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. Further work is scheduled to prepare a housing trajectory to be included in the local plan.
EDCLP/108 Sue Barry	Low growth development of housing	Noted – support is welcomed.
EDCLP/121 Marie Birkinshaw	• Yes, agree low growth, but also state that growth in the economy should not be the only measure on which success of the Borough is measured – and that continued economic growth may not fit well with the necessary net-zero carbon status needed by 2036. There are other well-being measures that could well be included such as the 'Five Ways to Mental Well-being' produced by the Government.	The evidence prepared to inform the draft local plan includes an objective appraisal of social, environmental, and economic factors. Decision-making on the overall level of growth, and individual development sites has weighed into the balance a range of social, environmental, and economic issues to come to a rounded view on whether proposals represent sustainable development. This includes those issues pertaining to achieving net-zero carbon status by 2036.
EDCLP/125 Tim Birkinshaw	• The low growth strategy is better, especially with the current political uncertainties.	Noted – support is welcomed.
EDCLP/134 RCA Regeneration Limited on behalf of Mr and Mrs Gamble	 In the face of worsening affordability cannot see how the Council can deliver the required affordable housing required with a low growth strategy; Housing Need Figure in Table 1 should be clearly stated as being 'a minimum', it is this that would provide the required flexibility that the Council are seeking. Consider that a 'do nothing' scenario for employment land (paragraph 4.20) would effectively result in managed economic decline. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating

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		growth, whilst minimising impacts on the environment.
		Previous evidence from the HEDNA (2017) established an "economic-led housing need" figure for Charnwood. This figure was calculated based on demographic forecasts and migration assumptions and determined the population growth that would result in the required increase in the resident workforce. The work showed that to achieve robust economic growth 812 dwellings per annum (between 2011 and 2031), or 735 dwellings per annum (between 2011 and 2036) were required.
		It is acknowledged that this data is from 2016/2017, and it is also recognised that the Standard Methodology now provides for a different per annum requirement. However, the economic-led housing need figure serves as a useful reference point for determining whether the number of dwellings identified for Charnwood would support a healthy economy and maintain a residence-based workforce. Given the draft local plan strategy is for 1,082 dwellings per annum, with an additional 1,300 dwellings to be delivered across the plan period, there is confidence that the growth scenario will achieve economic growth.
		The proposals for employment land do not represent a "do nothing" scenario. They account for the data and analysis in the HEDNA, and also account for existing commitments and the delivery record across the borough.
EDCLP/143 CPRE Leicestershire	 Low growth scenario is to be preferred. However: a) The figure is based on 2014 household projections from the Department of Communities and Local Government which 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy.
and its Charnwood District Group	 disregard the 2016 household projections produced by the independent Office for National Statistics that envisage a much reduced need. b) Do not agree with the proposal for an additional 1,300 homes to achieve flexibility. This is unnecessary as 	At present, this is the agreed methodological approach to follow, with Government confirming that the ONS figures should not be used. Applying the ONS figures could risk the local plan being found unsound. It may be that the Government position changes. If so, the Council will take account of any new evidence and determine the correct LHN figure.
	 'windfall' and brownfield sites will come forward. There is no obvious indication in the Plan that 'windfall' and brownfield sites are to be taken into account in calculating the supply figures and the number of sites required. 	Guidance in the NPPF and PPG is that development strategies should not become reliant on windfalls. Further evidence will be prepared to indicate whether a windfall allowance is necessary in order to define an appropriate development strategy.
EDCLP/147 Hoton Parish Council	 Hoton Parish Council agrees that the plan should be for low growth in Charnwood. 	Noted – support is welcomed.
EDCLP/157 Lorraine Davies	 The Strategy based on a low growth scenario is supported. Given the continuing pressure for development it is important 	The evidence prepared to inform the draft local plan includes an objective appraisal of social, environmental, and economic factors.

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Mountsorrel Parish Council EDCLP/165 Dr S.J.Bullman EDCLP/176 Hannah Post Barton Willmore obo Michelmersh Brick Holdings	 that environmental impact is reduced and new building takes place on land with the least environmental or amenity value. Yes. High growth is associated with increasing carbon emissions, which need reducing rather than increasing. Standard Methodology represents the starting point for calculating the number of new homes and should be considered a minimum; Chapter 6 of the draft Local Plan sets out high aspirations for employment growth which includes the delivery of 77.88ha of land for employment. As such, the Standard Method should be adjusted accordingly. Paragraph 4.9 sets out that the City of Leicester will have unmet needs however the Strategic Growth Plan identifies how this unmet need will be redistributed, and this does not affect the number of homes planned for Charnwood. However, the Strategic Growth Plan is due to commence its review and part of this will be the assessment of unmet housing need. As such, the draft Local Plan is due to commence its review. Client site at Shepshed is a sustainable location for growth and could deliver approximately 200 new homes to the housing supply of Charnwood and the wider area. 8,475 of the new homes proposed will be met through the development of three sustainable urban extensions (SUE). This equates to 46% of the housing need for the Borough. Whilst it is understood that the SUEs have all received or are in the process of applying for planning permission. It should be noted that the Annual Monitoring Reports (2015-2016, 2016-2017, and 2017-2018) all indicate risks associated with the SUEs. The AMRs demonstrate the dangers of relying on SUEs to meet housing needs and whilst we do not object to the inclusion of the SUEs in the new Local Plan, we are of the view tat in order to ensure a five year housing land supply can successfully be achieved and retained, then smaller sites such as Client's site at Shepshed. 	Noted – support is welcomed. Previous evidence from the HEDNA (2017) established an "economic-led housing need" figure for Charnwood. This figure was calculated based on demographic forecasts and migration assumptions and determined the population growth that would result in the required increase in the resident workforce. The work showed that to achieve robust economic growth 812 dwellings per annum (between 2011 and 2031), or 735 dwellings per annum (between 2011 and 2036) were required. It is acknowledged that this data is from 2016/2017, and it is also recognised that the Standard Methodology now provides for a different per annum requirement. However, the economic-led housing need figure serves as a useful reference point for determining whether the number of dwellings identified for Charnwood would support a healthy economy and maintain a residence-based workforce. Given the draft local plan strategy is for 1,082 dwellings per annum, with an additional 1,300 dwellings to be delivered across the plan period, there is confidence that the growth scenario will achieve economic growth. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council
EDCLP/178 Mark Rose	• The reference to "low" or "high" growth scenarios in the	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy.

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CONSULTEE Define obo Bloor Homes	• • •	Consultation Document is misleading. The determination of the minimum number of homes needed (the Local Housing Need- LHN) should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). The LHN is, however, a minimum requirement and consideration should be given to whether a higher level of provision is required to address the acute affordable housing need that has been identified. The most recent evidence identifies an affordable housing need of 384 dwellings per annum (dpa), the second highest in the in the Housing Market Area (HMA). An uplift to the LHN to establish a housing requirement in the CLP that addresses this critical issue is, therefore, required otherwise the housing needs of all sections of the Borough's resident population will not be addressed. There should not be an automatic presumption that sites that were previously allocated should be allocated again or that sites with only an outline planning permission will necessarily be delivered. Moreover, a robust review of the progress of the Sustainable Urban Extensions (SUEs) identified in the table is required in order to assess whether they will indeed provide the number of dwellings anticipated in the plan period. The CLP must include a robust trajectory of the SUEs (and any other strategic sites proposed to be allocated) illustrating the expected rate of housing delivery over the plan period based on a reasonable, realistic assessment of lead in times and delivery rates (NPPF para. 72-73). The genesis of the 1,300 figure is not clear. But, in any case, it is patently insufficient to ensure flexibility. A flexibility contingency of 20% (as per the Local Plan Advisory Group's recommendation) should be applied to ensure that the LHN is recognised as a minimum rather than a maximum figure.	OFFICER RESPONSE In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The LHN via the Standard Methodology takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. Sites within the draft local plan have emerged through a call for sites process, and have individually been appraised in the SHLAA. The SHLAA considers matters of suitability, availability, and achievability to determine whether a site is developable and deliverable. The Council is content that the sites included within the draft local plan are suitable, available, and achievable. Further analysis is also included in the Sustainability Appraisal, providing additional evidence to ensure that the most optimal sites are selected for the local plan. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. Further work is scheduled to prepare a housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effe
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	 agreement with district councils." The City Council has, therefore, formally declared an unmet need arising in the City and that is clearly a matter that all of the Planning Authorities in the HMA, including the Borough Council, need to address as part of their obligations under the Duty to Cooperate. Despite the draft local plan noting that Leicester City's unmet need does not affect the number of homes in Charnwood, the SGP is a non-statutory plan that has not been examined, The continued absence of the Memorandum of Understanding (or Statement of Common Ground) between the HMA Authorities is a real concern. Clear evidence of engagement and co-operation on how to address the housing needs across the HMA is required. If it is not possible to confirm how those unmet needs will be appropriately provided for elsewhere within the HMA, and realised through Local Plans, then the CLP will be fundamentally unsound. 	Statements of Common Ground.
EDCLP/179 Mark Rose Define obo Bloor Homes (HS37)	 The reference to "low" or "high" growth scenarios in the Consultation Document is misleading. The determination of the minimum number of homes needed (the Local Housing Need- LHN) should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). The LHN is, however, a minimum requirement and consideration should be given to whether a higher level of provision is required to address the acute affordable housing need that has been identified. The most recent evidence identifies an affordable housing need of 384 dwellings per annum (dpa), the second highest in the in the Housing Market Area (HMA). An uplift to the LHN to establish a housing requirement in the CLP that addresses this critical issue is, therefore, required otherwise the housing needs of all sections of the Borough's resident population will not be addressed. There should not be an automatic presumption that sites that were previously allocated should be allocated again or that sites with only an outline planning permission will necessarily be delivered. Moreover, a robust review of the progress of the Sustainable Urban Extensions (SUEs) identified in the table is required in order to assess whether they will indeed provide the 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The LHN via the Standard Methodology takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. Sites within the draft local plan have emerged through a call for sites process, and have individually been appraised in the SHLAA. The SHLAA considers matters of suitability, availability, and achievability to determine whether a site is developable and deliverable. The Council is content that the sites included within the draft local plan are suitable, available, and achievable.

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	 number of dwellings anticipated in the plan period. The CLP must include a robust trajectory of the SUEs (and any other strategic sites proposed to be allocated) illustrating the expected rate of housing delivery over the plan period based on a reasonable, realistic assessment of lead in times and delivery rates (NPPF para. 72-73). The genesis of the 1,300 figure is not clear. But, in any case, it is patently insufficient to ensure flexibility. A flexibility contingency of 20% (as per the Local Plan Advisory Group's recommendation) should be applied to ensure that the LHN is recognised as a minimum rather than a maximum figure. There is ongoing uncertainty in relation to Leicester City's unmet housing need. The recent report to Leicester City Council's Overview Select Committee (28th November 2019) identified a housing need of 29,104 dwellings (which is considered to be somewhat optimistic). Thus, a shortfall of 7,813 dwellings is anticipated; which "will be distributed through agreement with district councils." The City Council has, therefore, formally declared an unmet need arising in the City and that is clearly a matter that all of the Planning Authorities in the HMA, including the Borough Council, need to address as part of their obligations under the Duty to Cooperate. Despite the draft local plan noting that Leicester City's unmet need does not affect the number of homes in Charnwood, the SGP is a non-statutory plan that has not been examined, The continued absence of the Memorandum of Understanding (or Statement of Common Ground) between the HMA Authorities is a real concern. Clear evidence of engagement and co-operation on how to address the housing needs across the HMA is required. If it is not possible to confirm how those unmet needs will be appropriately provided for elsewhere within the HMA, and realised through Local Plans, then the CLP will be fundamentally unsound. 	Further analysis is also included in the Sustainability Appraisal, providing additional evidence to ensure that the most optimal sites are selected for the local plan. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. Further work is scheduled to prepare a housing trajectory to be included in the local plan. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	 The Council's decision to pursue a low growth strategy has not been adequately justified and it fails to recognise the benefits associated with a high growth option for both housing provision and economic growth. The Council has not investigated the potential for a growth scenario that would provide a better balance between the 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered

RESPONSE NO/ CONSULTEE		REPRESENTATION SUMMARY	OFFICER RESPONSE
		identified socio-economic benefits and potential environmental effects.	across the plan period.
	•	The locally assessed housing need should be adjusted upwards to take account of the socio-economic benefits of a higher level of growth, taking proper account of the significant jobs growth expected in the wider north Leicestershire area. A residual growth requirement of between 12,000-13,000 homes should	The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment.
	 be considered and assessed through an updated SA. Paragraph 4.2.6 of the SA advises that the higher option was informed by delivery evidence and in appraising the high growth options, the SA predicts it will perform more positively in relation 	The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments.	
		significant positive effects in relation to housing provision and economic growth due to the increased flexibility provided for housing provision and the increase in homes likely to be available to support economic growth.	As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are considered to represent an appraisal of reasonable alternatives.
			The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored.
			As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
EDCLP/205 Guy Longley Pegasus obo	•	The Council's decision to pursue a low growth strategy has not been adequately justified and it fails to recognise the benefits associated with a high growth option for both housing provision	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy.
Davidsons Development Ltd (Anstey)	•	and economic growth. The Council has not investigated the potential for a growth scenario that would provide a better balance between the identified socio-economic benefits and potential environmental effects.	In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period.
	•	The locally assessed housing need should be adjusted upwards to take account of the socio-economic benefits of a higher level of growth, taking proper account of the significant jobs growth expected in the wider north Leicestershire area. A residual growth requirement of between 12,000-13,000 homes should	The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be

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EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold)	 The Council's decision to pursue a low growth strategy has not been adequately justified and it fails to recognise the benefits associated with a high growth option for both housing provision and economic growth. The Council has not investigated the potential for a growth scenario that would provide a better balance between the identified socio-economic benefits and potential environmental effects. The locally assessed housing need should be adjusted upwards to take account of the socio-economic benefits of a higher level of growth, taking proper account of the significant jobs growth expected in the wider north Leicestershire area. A residual growth requirement of between 12,000-13,000 homes should be considered and assessed through an updated SA. Paragraph 4.2.6 of the SA advises that the higher option was informed by delivery evidence and in appraising the high growth options, the SA predicts it will perform more positively in relation to socio-economic factors and each option would generate significant positive effects in relation to housing provision and economic growth due to the increased flexibility provided for housing provision and the increase in homes likely to be available to support economic growth. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments. As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are considered to represent an appraisal of reasonable alternatives.

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		The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
EDCLP/207 Guy Longley Pegasus obo Davidsons Development Ltd (Sileby)	 The Draft Plan does not present a sufficiently ambitious strategy and there are concerns that the approach will not support local economic growth or ensure the delivery of housing to meet future requirements. The Council has dismissed a high growth option due to perceived environmental impacts but has not properly tested a growth strategy that could provide a better balance between the socio-economic benefits of growth and potential environmental impacts. 	The SA has considered a range of growth options. None of the options have been dismissed, the high growth option was appropriately assessed, and the analysis demonstrates that the higher growth option has negative impacts on environmental objectives. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Field Head)	 The Council's decision to pursue a low growth strategy has not been adequately justified and it fails to recognise the benefits associated with a high growth option for both housing provision and economic growth. The Council has not investigated the potential for a growth scenario that would provide a better balance between the identified socio-economic benefits and potential environmental effects. The locally assessed housing need should be adjusted upwards to take account of the socio-economic benefits of a higher level of growth, taking proper account of the significant jobs growth expected in the wider north Leicestershire area. A residual growth requirement of between 12,000-13,000 homes should be considered and assessed through an updated SA. Paragraph 4.2.6 of the SA advises that the higher option was informed by delivery evidence and in appraising the high growth options, the SA predicts it will perform more positively in relation to socio-economic factors and each option would generate significant positive effects in relation to housing provision and economic growth due to the increase in homes likely to be available to support economic growth. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments. As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are

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RESPONSE NO/ CONSULTEE	 The Council's decision to pursue a low growth strategy has not been adequately justified and it fails to recognise the benefits associated with a high growth option for both housing provision and economic growth. The Council has not investigated the potential for a growth scenario that would provide a better balance between the identified socio-economic benefits and potential environmental effects. The locally assessed housing need should be adjusted upwards to take account of the socio-economic benefits of a higher level of growth, taking proper account of the significant jobs growth expected in the wider north Leicestershire area. A residual growth requirement of between 12,000-13,000 homes should be considered and assessed through an updated SA. Paragraph 4.2.6 of the SA advises that the higher option was informed by delivery evidence and in appraising the high growth options, the SA predicts it will perform more positively in relation 	OFFICER RESPONSE The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options. The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments.
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		The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored.
	72	As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include

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EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	 We would suggest that a low-growth scenario with only a 7.2% buffer above minimum requirements falls some way short of being aspirational. Higher levels of growth within Charnwood Borough are clearly deliverable and will support wider economic objectives whilst also contributing to the Government's stated objective of significantly boosting the supply of homes. Charnwood should increase the LHN figure to take account of Leicester City's unmet need. Leicester City has recently confirmed an unmet need of 7,813 dwellings in the period to 2036, which therefore needs to be met within other authorities in the Leicester and Leicestershire Housing Market Area (HMA). It is understood that no Statement of Common Ground has yet been drafted, as it was pending Leicester City's confirmation of their unmet need. Notwithstanding the absence of a Statement of Common Ground, the draft Local Plan states that the Strategic Growth Plan identifies how the City's unmet need will be distributed, resulting in no requirement for an uplift to the number of homes to be delivered in Charnwood. We would challenge the extent to which a non-statutory plan which underwent only a single consultation and has not been subject to formal testing at examination forms an appropriate basis for binding the strategy and policies of future Local Plans, especially as it was drafted at a point when the extent of unmet need had not been established. The SGP, whilst commendable, cannot override the Duty to Cooperate and Statements of Common Ground which are required as part of formal plan-making process. LHN should be increased to support delivery of affordable housing to be delivered from new housing developments, but even if every site were to deliver this 30% target, this would still only provide 348 affordable homes over the plan period. Given that affordability in Charnwood has worsened progressively for many years, it is imperative that significant 	further analysis of growth options. The high growth scenario, when analysed through the SA, showcased significant positive effects for housing, as well as positive effects for the local economy and deprivation. But, it also showcased a number of significant negative impacts on landscape character, soil resources, historic environment, and air quality. Considered against the alternative growth scenarios, the high growth option performed less well, and, under comparison, is clearly the option with the fewest positive effects, and the greatest number of negative effects. As such, the Council considers this growth scenario would not deliver sustainable development in the borough. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. Previous evidence from the HEDNA (2017) established an "economic-led housing need" figure for Charnwood. This figure was calculated based on demographic forecasts and migration assumptions and determined the population growth that would result in the required increase in the resident workforce. The work showed that to achieve robust economic growth 812 dwellings per annum (between 2011 and 2031), or 735 dwellings per annum (between 2011 and 2031), or 735 dwellings identified for Charnwood would support a healthy economy and maintain a residence-based workforce. Given the draft local plan strategy is for 1,082 dwellings per annum, with an additional 1,300 dwellings to be delivered across the plan period, there is confidence that the growth scenario will achieve economic growth. The LHN via the Standard Methodology takes

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	 weight is given to this issue, and that meeting affordable needs in full forms a cornerstone of the new Local Plan. Furthermore, a low growth option will jeopardise the ability of the Borough to meet the needs of its future labour market, hindering economic prosperity, and/or leading to increased levels of in-commuting, placing increased burden on transport infrastructure. The Council have included a contingency of 1,300 dwellings in order to ensure some flexibility in the plan. However, this equates to only 7.2% more than minimum requirements, which is considered insufficient to ensure the required certainty of a plan-led approach to meeting local needs. Higher growth would lead to greater flexibility in meeting local needs, and in maintaining a 5-year supply of deliverable housing land. The ability of the market to deliver a higher level of housing is shown by the Housing Delivery Study (2017), prepared on behalf of the Council by BBP Regeneration in support of the Local Plan. It concludes that all 4 of the modelled scenarios provide enough available and achievable land to meet identified housing need to 2036, with these models considering estimated delivery for the period 2017/18 – 2035/36 ranging from 23,253 to 25,828 dwellings, with delivery peaking at between 1,497 and 1,679 dwellings per annum. This is assisted by the availability of land in the areas of highest demand capacity at Loughborough and the fringe of Leicester City. The Local Plan's final housing requirement figure should be expressed as a minimum, not a maximum. These are the minimum levels of development which Charnwood must achieve within the plan period, with the overall objective being to contribute to boosting significantly the supply of housing. 	dwellings per annum figure.
EDCLP/218 Emma Holyoak	 I agree that Charnwood should pursue a low growth strategy but I think the contingency of 1300 homes in its current spread would place too great a strain on the outlying villages. In relation to the villages I think they should be visibly seen as a last alternative rather than taking a percentage of developments. 	The overall strategy for growth is one of urban concentration and intensification. Policy LP1 sets out the share of housing provision, with the small villages and hamlets apportioned only 0.1% of the overall housing provision.
EDCLP/226 Eleanor Hood	• Development policy. It is important to go for low growth in terms of development as their has been a lot recently, but the housing needs to meet the demands of the demography i.e. more housing suitable for older people. These areas will need to have	The overall strategy for growth is one of urban concentration and intensification, apportioning the majority of growth towards the main urban centres, where there is a greater provision of services.

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EDCLP/246 Andrew Collis Gladman Developments Ltd	 suitable infrastructure for these people too, so local shops, bus routes, and medical services. Considering recent changes to national planning policy, this question is irrelevant. The proposed housing requirement of 1,082 dwellings per year represents the minimum level of housing growth required under national planning policy as set out under the 2019 NPPF. Instead PPG confirms the existence of circumstances in which the adoption of a higher housing requirement is justified. There is little evidence that the Council has considered these matters when arriving at the proposed housing requirement. To address this concern and respond to PPG, it is suggested that an exercise is undertaken by the Council ahead of the Regulation 19 stage to examine whether the housing requirement should be uplifted in response to any of the above factors. This exercise should be undertaken in parallel to work considering what effects accommodating a higher level of growth in the Borough would have on sustainability factors, including identifying potential supply options to respond to the unmet housing needs of Leicester and/or facilitate the delivery of the longer term growth strategies. The work should inform the final version of the Local Plan to be submitted for examination. 	 Policy LP6 will ensure that there is the right housing mix delivered across the borough, including provision suitable for older people. The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The factors identified have been taken into consideration as part of formulating the housing requirement. The Council has accounted for the SGP, and planned infrastructure requirements. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/254 lan Deverell Turley on behalf of Rainier Developments Ltd)	 The unmet housing need arising from Leicester is a fundamental issue for the new Local Plan to address. NPPF paragraph 60 is clear that this should be a central step in the formation of a plan, and failure to do so risks the plan not meeting the legal duty to cooperate. LHN is a minimum annual housing need figure, which should be considered as a starting point for the identification of a suitable level of housing need to be planned for throughout the plan period. The SGP proposes significant new strategic infrastructure across Leicestershire. PPG sets out that new strategic infrastructure is an instance where local housing need may be excess of standard method. While it is appreciated that the Council are yet to prepare an Infrastructure Delivery Plan (IDP) (which we comment upon in response to Question 41), the IDP may identify strategic infrastructure requirements which can only be facilitated through the delivery of more housing and economic growth. 	At present, the unmet housing need figure for Leicester City Council has not been formally defined. Ongoing discussions (with LCC and other strategic policy-making authorities) as part of the Duty to Co-operate will establish if and when any un-met need may arise. Without access to the evidence base that sits behind any conclusions by Leicester City, the Council is not in a position to comment, or indeed, act on any unmet need figures. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. The strategic infrastructure that may be required as part of the SGP will be coordinated at the strategic level. Decisions on how and when to deliver this infrastructure will be made jointly, and confirmed through SoCG between the relevant local authorities. Evidence on local infrastructure requirements will be set out in the IDP (which will be finalised shortly).

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EDCLP/255 lan Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	 The unmet housing need arising from Leicester is a fundamental issue for the new Local Plan to address. NPPF paragraph 60 is clear that this should be a central step in the formation of a plan, and failure to do so risks the plan not meeting the legal duty to cooperate. LHN is a minimum annual housing need figure, which should be considered as a starting point for the identification of a suitable level of housing need to be planned for throughout the plan period. The SGP proposes significant new strategic infrastructure across Leicestershire. PPG sets out that new strategic infrastructure is an instance where local housing need may be excess of standard method. While it is appreciated that the Council are yet to prepare an Infrastructure Delivery Plan (IDP) (which we comment upon in response to Question 41), the IDP may identify strategic infrastructure requirements which can only be facilitated through the delivery of more housing and economic growth. 	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. The strategic infrastructure that may be required as part of the SGP will be coordinated at the strategic level. Decisions on how and when to deliver this infrastructure will be made jointly, and confirmed through SoCG between the relevant local authorities. Evidence on local infrastructure requirements will be set out in the IDP (which will be finalised shortly).
EDCLP/258 Sam Heaton Heaton Planning on behalf of Swithland Homes Ltd	 The new Local Plan is to rely on the delivery of larger sites and three SUEs to deliver approximately 46% of the overall housing requirement. The Charnwood Housing Delivery Study (2017) was undertaken to inform the preparation of the new Local Plan to 2036. The document notes at Paragraph 1.7 that the Council has identified a shortfall in short term land supply within the Borough, primarily "due to the lead-in times associated with bringing forward large sites" and, in the short term, housing delivery rates will be insufficient to address undersupply from previous years and without proactive intervention there will remain an undersupply of housing probably into the mid to late 2020s. The Council has previously acknowledged within the previous round of consultation that not all of the sites contributing to supply of new residential development within the adopted Core Strategy will be completed by 2036. The Regulation 18 Draft Local Plan notes "the long term build out rates of large sites have the potential to change due to unforeseen circumstances such as changes in the housing market or delays with overcoming site constraints." However, it is clear that the Council's evidence on land availability does not feed into an overall strategy which allows small and medium sites to come forward for development. 	The SUEs are an important part of the development strategy. All of the SUEs now benefit from planning permission, and there is strong confidence that the sites will deliver the proposed scale of housing. SoCG/MoUs have been agreed between the Council and the promoter of each SUE. These SoCGs/MoUs set out the delivery rates and expected delivery timetable for the SUEs. In order to provide flexibility and resilience to the housing supply, an additional 1,300 homes are planned to be delivered across the plan period.

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EDCLP/202 Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	significant risk to the robustness and longevity of the Local Plan.	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. This approach is considered to be in conformity with the NPPF.
EDCLP/201 Boyer Planning obo Knightwood Trust Farms • • •	growth scenario is limited. The decision to opt for a low growth strategy has not been positively prepared or formulated using a robust evidence base. Given the lack of justification for the strategy, the Plan is not 'sound' in accordance with paragraph 35 of the Revised Framework (2019) and it does not meet the legal requirements. It is strongly contended that higher levels of growth would not result in greater environmental impacts and there are a number of opportunities available for the Local Planning Authority to deliver growth whilst meeting the economic, social and environmental sustainability objectives set out in paragraph 8 of the Revised Framework (2019). The Council have not given adequate weight towards the acknowledged benefits of the higher growth strategy. In paragraph 4.13 of the Plan (20192036) the Council have recognised that new sites may take longer than the plan period to be delivered and the long term build out rates on larger sites has a higher potential to change due to unforeseen circumstances. Thus, a higher growth scenario would provide greater flexibility which in turn will aid delivery and ensure that a five-year housing land supply is maintained throughout the plan period. Charnwood falls within the wider housing market of Leicester and Leicestershire. Charnwood should assist in meeting the anticipated unmet need in Leicester. The Leicester and Leicestershire Strategy Growth Plan is non-statutory document which has not been subject to an independent examination. The actual distribution will be agreed as part of a Memorandum of Understanding (MoU), which has yet to be completed.	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. This approach is considered to be in conformity with the NPPF.

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EDCLP/192 Severn Trent Water	 over the plan period. Given the significant increase, the Council need to give careful consideration as to how the affordable units can be delivered, and should increase the total housing requirement figure to facilitate the delivery of the required affordable homes. The standard methodology for calculating housing need is a minimum starting point. It does not include any economic uplift to facilitate growth nor does it take account affordable housing provision or any duty to cooperate with neighbouring authorities. Planning Practice Guidance states that the standard methodology is not able to take into account future government policies, changing economic circumstances or any other factors that might have an impact on demographic behaviour. Charnwood should therefore be providing additional houses to take into account the factors highlighted above and a high growth strategy would be capable of achieving this. Severn Trent are unable to comment on what the appropriate level of growth, as it is outside of our area of expertise. We would however note that the more development that occurs, the more extensive infrastructure improvements will be required. Where additional sites are allocated above the minimum housing need there is the potential to reduce certainty in a particular development being brought forward within the plan period. This increased uncertainty regarding the location, scale and phasing of development will make it more difficult to provide infrastructure improvements, in advance of a development numbers consider deliverability so that infrastructure improvements can be considered strategically with sufficient certainty of need. 	The housing growth figures are derived from the LHN, using the Standard Methodology. The Council has liaised with all statutory infrastructure providers to ensure that infrastructure requirements are known. This evidence has been used to inform the deliverability data in the SHLAA and in the draft local plan. The Council's evidence base, including the IDP, will be revised, where necessary, with further input from infrastructure providers.
EDCLP/185 LRM Planning obo William Davis	 The need for 1,082 new homes per annum, which equates to a housing requirement over the plan period of 18,394 dwellings should be the minimum number of homes provided over the plan period. However, consideration needs to be given to the factors that would suggest an increase in the housing requirement, including: A) Charnwood is located within the Leicester and Leicestershire LEP. The Loughborough and Leicester 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The factors identified have been taken into consideration as part of
	Enterprise Zone is located within the LEP and is alone to	formulating the housing requirement. The Council has accounted for the

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JUNGOLITLE	provide 21,000 new jobs over a 25-year period. In addition,	SGP, and planned infrastructure requirements.
	 two other economic growth areas are also located within the town (Loughborough University and Life Sciences Opportunity Zone). Accordingly, Loughborough is a location which is to be a focus for employment growth over the plan period and beyond. B) A number of key strategic infrastructure improvements are proposed for Charnwood, including: The upgrading and the electrification of the Midland Main Line Railway; 	Previous evidence from the HEDNA (2017) established an "economic-led housing need" figure for Charnwood. This figure was calculated based on demographic forecasts and migration assumptions and determined the population growth that would result in the required increase in the resident workforce. The work showed that to achieve robust economic growth 812 dwellings per annum (between 2011 and 2031), or 735 dwellings per annum (between 2011 and 2036) were required.
	 Improvements to Junction 23 of the M1, which as outlined in the Midlands Engine Strategy, will unlock land for up to 4,000 homes and employment opportunities; and High Speed 2 is to pass to the west of Loughborough. C) Unmet Need - In this regard, we note that in their response to the previous Local Plan consultation, Leicester City Council formally indicated that, due to its tightly drawn 	The 'Planned Growth Scenario' within the HEDNA takes account of planned investment and pipeline development projects; this includes the growth in scientific and pharmaceutical activities at Loughborough and committed investment associated with the Loughborough and Leicester Enterprise Zone.
	administrative boundary and the lack of suitable and available land for housing, they would be unable to fully meet its objectively assessed level of housing. Whilst the Council has, as yet, been unable to calculate the shortfall, it envisages that it will be 'significant'. Since this time further progress has been made on a Draft Leicester Local Plan with a report being made to the Overview Select Committee Meeting on the 28 th November 2019. This report sets out the main strategy for the Draft Leicester Plan and a	Whilst it is acknowledged that this data is from 2016/2017, and it is also recognised that the Standard Methodology now provides for a different per annum requirement. However, the economic-led housing need figure serves as a useful reference point for determining whether the number of dwellings identified for Charnwood would support a healthy economy and maintain a residence-based workforce. Given the draft local plan strategy is for 1,082 dwellings per annum, with an additional 1,300 dwellings to be delivered across the plan period, there is confidence that the growth scenario will achieve economic growth.
	 timetable for the stages of consultation. They are looking at a Full Council meeting on the 16th January to approve the plan, with public consultation end of Jan/early Feb 2020, submission Summer 2020 and an Examination in the Autumn. The emerging strategy identifies a shortfall of 7,813 dwellings to be distributed to adjacent districts. The proximity and the clear functional relationship between the 	National and sub-regional scale infrastructure will be dealt with by the relevant statutory infrastructure providers. The implications on the Council will be analysed through the IDP. At present, there are no clear indication that the planned infrastructure will result in an uplift in housing requirement.
	southern areas of Charnwood and Leicester should not be ignored. The current allocations proposed in this part of the Borough, could and should in the context of the achievement of sustainable development, form a key aspect of meeting Leicester's unmet need. This would necessitate additional development in other parts of Charnwood to ensure that its objectively assessed need is met alongside a contribution to meeting Leicester's unmet needs.	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
	 In order to ensure continuation of supply over the plan period it is essential that realistic lead-in times and delivery rates are 	Proposals for the SUEs are supported by SoCGs between the

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	 employed. Unfortunately, no housing trajectory has been provided alongside the Draft Local Plan so it is not possible to consider in detail the assumptions that are being made. We note for example that large strategic sites – Sites HS1, HS2 and HS3 are expected to deliver some 10,000 new homes by 2036. For North East of Leicester, the average build rate over the plan period would need to be in excess of 250 dwellings per annum. For West of Loughborough the build rate would need to exceed 200 dwellings per annum. It is instructive that in each of the Housing Delivery Scenarios set out in the December 2017 Housing Delivery Study these build rates are either not achieved or are achieved for only short periods of time and neither of these sites is completed with the plan period on the basis of the build rates set out therein. Particular care needs to be given to ensuring that the assumptions about housing delivery are robust. Local Plan identifies a supply over the Plan period of 19,716 dwellings, against a objectively assessed need figure of 18,394 dwellings. This represents a theoretical increase or oversupply of 7%. However, this does not provide the necessary flexibility to take account of changing circumstances. Historically and elsewhere a figure of 10% non-implementation allowance has been used to reflect the fact that certain sites identified for housing will not be so developed, or will only be developed in part, or may achieve permission for an alternative use. Core Strategy identified 10% allowance. 	developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. During the forthcoming independent examination, the Council will showcase the sites that will constitute a five-year supply. As per the requirements of the NPPF / PPG, the Council will be required to include a 10% buffer. Following the examination, an Inspector's report will provide recommendations in relation to the land supply and will enable the Council to confirm they have a five-year land supply in a recently adopted plan.
EDCLP/182 Pegasus obo David Wilson Homes	 The Council's decision to pursue a low growth strategy has not been adequately justified and it fails to recognise the benefits associated with a high growth option for both housing provision and economic growth. The Council has not investigated the potential for a growth scenario that would provide a better balance between the identified socio-economic benefits and potential environmental effects. The locally assessed housing need should be adjusted upwards to take account of the socio-economic benefits of a higher level of growth, taking proper account of the significant jobs growth 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth whilst minimising impacts on the onvironment.
	 expected in the wider north Leicestershire area. A residual growth requirement of between 12,000-13,000 homes should be considered and assessed through an updated SA. Paragraph 4.2.6 of the SA advises that the higher option was 	growth, whilst minimising impacts on the environment. The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and

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	informed by delivery evidence and in appraising the high growth options, the SA predicts it will perform more positively in relation to socio-economic factors and each option would generate significant positive effects in relation to housing provision and economic growth due to the increased flexibility provided for housing provision and the increase in homes likely to be available to support economic growth.	commitments. As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are considered to represent an appraisal of reasonable alternatives. The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored.
		As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
EDCLP/160 Persimmon Homes	 LHN should be seen as a starting point. Should take into account the unmet needs from Leicester City. As part of the Leicester and Leicestershire Housing Market Area, Charnwood should be mindful of this; particularly when considering the level of additional homes to enable flexibility in the future. 	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/153 East Goscote Parish Council	 We do not concede that the need for the additional allocation has been justified. Governmental guidance on assessment of need states, "There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances." The standard method was instituted because of governmental concerns over insufficient allocation of land. It contains a multiplier to permit additional supply in areas of high house prices and another multiplier, where appropriate, to permit additional supply in areas where housebuilding has not kept up with the requirement. Many local authorities include a figure for "windfall development" within their calculations of housing land to recognise the fact that it is not, in practice, possible to count all the sites which will become available within a Plan period. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. Options for the proposed scale of growth have been considered and appraised through the SA. This work has shown that the Hybrid option (7,800 additional dwellings) represents the most sustainable approach, in terms of balancing social, environmental, and economic impacts. The Council has also prepared detailed analysis of potential sites through
	• This matters, because, as the Plan itself admits, higher-growth strategies have a greater environmental impact. Development is	the SHLAA. The SHLAA considers a range of criteria, including suitability, availability and achievability, to determine whether sites are deliverable and/or developable.

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	•	a massive source of carbon emissions in itself. The construction of a masonry house entails the emission of about 52.5 tonnes of CO ² ; depending on the land conditions prior to development, it may entail the removal of carbon-sequestering vegetation. Allocating sites for more dwellings than are needed confers flexibility; but too much flexibility may not be a good thing in a planning context. A primary task of planning is to direct development towards the most appropriate sites. This means more than simply dividing sites into "suitable" and "unsuitable". A hierarchy of suitability could be applied, as it is in many housing land assessments. At the top of this hierarchy should be sites where redevelopment is not just acceptable but desirable – brownfield sites in accessible locations where redevelopment can have benefits for regeneration. We note that the Plan states "we will continue to support the Watermead Regeneration Corridor" but fails to indicate exactly how this support will be given. It may be relatively unlikely that brownfield sites here and elsewhere will be prioritised by developers.	The scale of growth and the sites have also been further appraised through the SA process. Taken together the current approach, with the current range of sites, represents the most sustainable option. Guidance in the NPPF and PPG is that development strategies should not become reliant on windfalls. F1qurther evidence will be prepared to indicate whether a windfall allowance is necessary in order to define an appropriate development strategy.
EDCLP/247 Fisher German obo Mr S W Taylor and Mr P A Taylor	•	 Pursing a low growth scenario is not supported. Planning for a high growth scenario provides greater flexibility, aids delivery, and helps maintain a five-year supply. A 20% buffer needs to be applied. Planning for an additional 1,300 homes above the baseline housing requirement is not considered to "strike the right balance" between ensuing flexibility and protecting the environment. The additional 1,300 homes represents just a 7% buffer. The Plan also needs to take into consideration Leicester City's unmet need. The Council's statement within the consultation document that the unmet need "does not affect the number of homes we need to plan for in Charnwood" is misleading. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. During the forthcoming independent examination, the Council will showcase the sites that will constitute a five-year supply. As per the requirements of the NPPF / PPG, the Council will be required to include a 10% buffer. Following the examination, an Inspector's report will provide recommendations in relation to the long supply and will onable the
	•	Charnwood will have a role to play in ensuring the delivery of the unmet need to 2036. The Strategic Growth Plan (SGP) is clear that the unmet need arising in the administrative areas of Leicestershire City Council (and Oadby & Wigston Borough beyond 2031) will need to be accommodated in the remaining Borough and District Councils, within the Housing Market Area (HMA). It states that this should be reflected in their Local Plans as they progress and will be supported by an agreed Statement of Common Ground. Leicester City Council has recently published its anticipated	recommendations in relation to the land supply and will enable the Council to confirm they have a five-year land supply in a recently adopted plan. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed

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		unmet need figure to 2036; 7,813 dwellings. The distribution of this will be agreed through a Statement of Common Ground amongst the HMA authorities and reflected in their Local Plans. Given the direct relationship of Charnwood Borough with the City, it is considered that Charnwood should, and can, take a significant proportion of this need.	Statements of Common Ground.
EDCLP/ 244 Fisher German obo Rearsby Trust	•		The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. During the forthcoming independent examination, the Council will showcase the sites that will constitute a five-year supply. As per the requirements of the NPPF / PPG, the Council will be required to include a 10% buffer. Following the examination, an Inspector's report will provide recommendations in relation to the land supply and will enable the Council to confirm they have a five-year land supply in a recently adopted plan. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/239 Jonathon Barratt- Peacock	•	significant proportion of this need. Yes, as low as possible	Noted – support is welcomed.
EDCLP/239 Vivienne Barratt- Peacock	•	Yes, low growth is essential. The high growth in recent years has significantly eroded the quality of life for existing residents through ruining historic and countryside locations, creating traffic chaos and meaning that it is very difficult to obtain a GP	The growth scenarios have been appropriately assessed through the SA process. This ensures that the impacts of development are understood and minimised.

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		appointment and hat many children are denied places at their local schools. I believe 30 children from Rothley were not able to go to Rawlins last year, even though it is their catchment school, due to it being oversubscribed. Class sizes of 36 in secondary schools are common across Charnwood and are not acceptable.	The relationship between the scale of planned growth and infrastructure provision will be analysed through the IDP. Policy LP33, Policy LP34, and Policy LP35; as well as the specific policies for each of the SUEs will ensure that the necessary infrastructure required to support future development is delivered.
EDCLP/211 Cllr Margaret Smidowicz	•	I support low growth and would rather not be a target for future speculative applications. My concern is that in Loughborough, Barrow on Soar, Bradgate Park and other specific areas the infrastructure is already compromised with roads either severely congested or impassable. Frequently parked on cycle lanes (Ashby Road) and completely on pavements ie, Nanpantan Road, Grove Road and others Many of the housing developments are not fit for purpose and poorly designed with flawed parking on site and narrow roads difficult to navigate and cars parked in garages too small to accommodate even middle- sized vehicles. What guarantees will be there be for future SUEs and even small-scale developments when developers want profits and the scale is 'just under' what can offer adequate S106 returns for the community. We plan for the future when the plan for the past has not even started.	There are detailed policies for each of the SUEs, which set out parameters for how each site should be delivered – including reference to facilities, car parking, layout, design, and environmental protection and enhancement. Furthermore, each application for the SUEs will be supported by a Development Framework, which will define he delivery and phasing arrangements.
EDCLP/210 Boyer Planning obo Stagfield Group	•	A considerable proportion of the Borough's overall housing need is to be achieved through the continued delivery of Sustainable Urban Extensions as carried through from the Core Strategy, as well as existing permissions as achieved by 31st March 2019. Whilst we do not wholly disagree with the preferred urban concentration and intensification development strategy as being the primary vehicle for meeting the Borough's housing need, we	The SUEs are an important part of the development strategy. All of the SUEs now benefit from planning permission, and there is confidence that the sites will deliver the proposed scale of housing. SoCG/MoUs have been agreed between the Council and the promoter of each SUE. These SoCGs/MoUs set out the delivery rates and expected delivery timetable for the SUEs.
	•	do consider that a greater focus should be given to the 'Other Settlements' in Charnwood as being appropriate settlements for an increase in housing distribution in the emerging Local Plan. In addition to this, we consider that the additional 1,300 dwellings sought over the plan period is insufficient in order to truly provide flexibility, and does not sufficiently protect the housing land supply from even a medium growth scenario.	The development strategy is predicated on the principle of urban concentration and intensification. The strategy apportions 5% of the planned growth to 'Other Settlements'. This approach is informed by the SA, with the appraisal showing that this distribution maximises the benefits of delivering new housing, whilst seeking to avoid significant adverse environmental impacts.
EDCLP/195 Greg Hutton Davidsons	•	The Council's decision to pursue a low growth strategy has not been adequately justified and it fails to recognise the benefits associated with a high growth option for both housing provision	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy.
Developments Ltd	•	and economic growth. The Council has not investigated the potential for a growth	In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes

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		scenario that would provide a better balance between the identified socio-economic benefits and potential environmental effects.	(over and above the Local Housing Need) are planned to be delivered across the plan period.
	The loca to take a of growth expected growth re	The locally assessed housing need should be adjusted upwards to take account of the socio-economic benefits of a higher level of growth, taking proper account of the significant jobs growth expected in the wider north Leicestershire area. A residual growth requirement of between 12,000-13,000 homes should be considered and assessed through an updated SA.	The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures is additional growth, baying taken appropriate balance
	•	Paragraph 4.2.6 of the SA advises that the higher option was informed by delivery evidence and in appraising the high growth options, the SA predicts it will perform more positively in relation	found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments.
		to socio-economic factors and each option would generate significant positive effects in relation to housing provision and economic growth due to the increased flexibility provided for housing provision and the increase in homes likely to be available to support economic growth.	As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are considered to represent an appraisal of reasonable alternatives.
			The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored.
			As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
EDCLP/193 Richard Webb	•	I agree that a low growth scenario should be pursued.	Noted – support is welcomed.
EDCLP/204 Guy Longley Pegasu s obo Davidsons	•	The Council's decision to pursue a low growth strategy has not been adequately justified and it fails to recognise the benefits associated with a high growth option for both housing provision	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy.
Development Ltd (Rothley)	•	and economic growth. The Council has not investigated the potential for a growth scenario that would provide a better balance between the identified socio-economic benefits and potential environmental	In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period.
	•	effects. The locally assessed housing need should be adjusted upwards to take account of the socio-economic benefits of a higher level of growth, taking proper account of the significant jobs growth	The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment.

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	 expected in the wider north Leicestershire area. A residual growth requirement of between 12,000-13,000 homes should be considered and assessed through an updated SA. Paragraph 4.2.6 of the SA advises that the higher option was informed by delivery evidence and in appraising the high growth options, the SA predicts it will perform more positively in relation to socio-economic factors and each option would generate significant positive effects in relation to housing provision and economic growth due to the increased flexibility provided for housing provision and the increase in homes likely to be available to support economic growth. 	The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments. As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are considered to represent an appraisal of reasonable alternatives. The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored. As the draft local plan is refined, the SA will also be updated to reflect
DCLP 265 Silver Fox obo Ms J & Ms A Kimber	 We would suggest that a low-growth scenario with only a 7.2% buffer above minimum requirements falls some way short of being aspirational. Higher levels of growth within Charnwood Borough are clearly deliverable and will support wider economic objectives whilst also contributing to the Government's stated objective of significantly boosting the supply of homes. Charnwood should increase the LHN figure to take account of Leicester City's unmet need. Leicester City has recently confirmed an unmet need of 7,813 dwellings in the period to 2036, which therefore needs to be 	any changes in policy approach. Where necessary, this will include further analysis of growth options. The high growth scenario, when analysed through the SA, showcased significant positive effects for housing, as well as positive effects for the local economy and deprivation. But, it also showcased a number of significant negative impacts on landscape character, soil resources, historic environment, and air quality. Considered against the alternative growth scenarios, the high growth option performed less well, and, under comparison, is clearly the option with the fewest positive effects, and the greatest number of negative effects. As such, the Council considers this growth scenario would not deliver sustainable development in the borough.
	 met within other authorities in the Leicester and Leicestershire Housing Market Area (HMA). It is understood that no Statement of Common Ground has yet been drafted, as it was pending Leicester City's confirmation of their unmet need. Notwithstanding the absence of a Statement of Common Ground, the draft Local Plan states that the Strategic Growth Plan identifies how the City's unmet need will be distributed, resulting in no requirement for an uplift to the number of homes 	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. Previous evidence from the HEDNA (2017) established an "economic-led

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	•	to be delivered in Charnwood. We would challenge the extent to which a non-statutory plan which underwent only a single consultation and has not been subject to formal testing at examination forms an appropriate basis for binding the strategy and policies of future Local Plans, especially as it was drafted at a point when the extent of unmet need had not been established.	housing need" figure for Charnwood. This figure was calculated based on demographic forecasts and migration assumptions and determined the population growth that would result in the required increase in the resident workforce. The work showed that to achieve robust economic growth 812 dwellings per annum (between 2011 and 2031), or 735 dwellings per annum (between 2011 and 2036) were required.
	•	The SGP, whilst commendable, cannot override the Duty to Co- operate and Statements of Common Ground which are required as part of formal plan-making process.	It is acknowledged that this data is from 2016/2017, and it is also recognised that the Standard Methodology now provides for a different per annum requirement. However, the economic-led housing need figure
	•	LHN should be increased to support delivery of affordable housing – with reference to the net annual need set out in the HEDNA.	serves as a useful reference point for determining whether the number of dwellings identified for Charnwood would support a healthy economy and maintain a residence-based workforce. Given the draft local plan strategy
	•	Draft Policy LP4 proposes a target of 30% affordable housing to be delivered from new housing developments, but even if every site were to deliver this 30% target, this would still only provide 348 affordable homes per annum, leading to a shortfall in 612 affordable homes over the plan period.	is for 1,082 dwellings per annum, with an additional 1,300 dwellings to be delivered across the plan period, there is confidence that the growth scenario will achieve economic growth. The LHN via the Standard Methodology takes specific account of the
	•	Given that affordability in Charnwood has worsened progressively for many years, it is imperative that significant weight is given to this issue, and that meeting affordable needs in full forms a cornerstone of the new Local Plan.	affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure.
	•	Furthermore, a low growth option will jeopardise the ability of the Borough to meet the needs of its future labour market, hindering economic prosperity, and/or leading to increased levels of in-commuting, placing increased burden on transport infrastructure.	
	•	The Council have included a contingency of 1,300 dwellings in order to ensure some flexibility in the plan. However, this equates to only 7.2% more than minimum requirements, which is considered insufficient to ensure the required certainty of a plan-led approach to meeting local needs.	
	•	Higher growth would lead to greater flexibility in meeting local needs, and in maintaining a 5-year supply of deliverable housing land.	
	•	The ability of the market to deliver a higher level of housing is shown by the Housing Delivery Study (2017), prepared on behalf of the Council by BBP Regeneration in support of the Local Plan. It concludes that all 4 of the modelled scenarios provide enough available and achievable land to meet identified housing need to 2036, with these models considering estimated	

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	 delivery for the period 2017/18 – 2035/36 ranging from 2 to 25,828 dwellings, with delivery peaking at between 1,41,679 dwellings per annum. This is assisted by the availat of land in the areas of highest demand capacity at Loughborough and the fringe of Leicester City. The Local Plan's final housing requirement figure should expressed as a minimum, not a maximum. These are the minimum levels of development which Charnwood must achieve within the plan period, with the overall objective to contribute to boosting significantly the supply of housin Support general approach, but expresses caution and conthis may be too low for the following three reasons: A) the Local Plan provision figure ideally needs to incorporate boosting significantly the supply of housing a buffer of 20% to enable sufficient flexibility, and to provide the case. B) partners are now in a position where the scale of unrhousing need for Leicester City is becoming clearer a although the redistribution of this unmet need is likely zero towards Charnwood Borough due to the strateg SGP, it is suggested that sufficient scope needs to be incorporated in emerging plan making to increase provide informed through the Statement of Common Grount this should be the case C) a low growth option does not appear to chime well w Government's national ambition to achieve the delived 300,000 new homes each year, although it is noted t low growth option would still require a step change ir housing delivery in Charnwood Borough compared to current Core Strategy requirement (820 homes a year). 	32,253 497 and ability Ibe e being ng. oncern The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. porate provide e-year in order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. net and y to be by of the e equirements of the NPPF / PPG, the Council will be required to include a 10% buffer. Following the examination, an Inspector's report will provide recommendations in relation to the land supply and will enable the Council to confirm they have a five-year land supply in a recently adopted plan. ith the ary of hat the o its minum annual local housing need figure. minum annual local housing need figure. minum annual local housing need figure.
	 As such it is considered that the proposed further nousin provision figure of 7,252 homes should be increased or regarded as a minimum and that further consideration is to increasing the figure on the finalisation of the Stateme Common Ground 	be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
DCLP/261 Edward Argar MP	 I do agree that a low growth scenario is the correct appro- but would argue that a) if population projections change 	oach, Any changes to the population projections will be identified. Any changes would be reflected in the LHN calculation through use of the Standard Methodology.

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 in the Plan and red EDCLP/155 Gemma Yardley Blaby District Council It is unclear in polic the Borough is and cause confusion. 	Id be possible to revisit the housing numbers duce them. hat the local housing need for the Borough od is 18,394 new homes, but Policy LP1 or at least 19,719 new homes. cy terms what the housing requirement for d there is potential for the higher number to	
 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes The Council has no scenario that would identified socio-ecc effects. The locally assess to take account of of growth, taking p expected in the wid growth requirement be considered and Paragraph 4.2.6 of informed by deliver options, the SA pre- to socio-economic significant positive economic growth d housing provision a 	sion to pursue a low growth strategy has not ustified and it fails to recognise the benefits high growth option for both housing provision wth. ot investigated the potential for a growth d provide a better balance between the onomic benefits and potential environmental ed housing need should be adjusted upwards the socio-economic benefits of a higher level roper account of the significant jobs growth der north Leicestershire area. A residual ht of between 12,000-13,000 homes should assessed through an updated SA. If the SA advises that the higher option was ry evidence and in appraising the high growth edicts it will perform more positively in relation factors and each option would generate effects in relation to housing provision and due to the increase of flexibility provided for and the increase in homes likely to be rt economic growth.	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment. The SA has considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments. As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are considered to represent an appraisal of reasonable alternatives. The proposed "to be found" growth figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored.

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EDCLP/175 Ian Nelson North West Leicestershire District Council	 The LHN is considered appropriate as it is based on the government's standard method and is consistent with the NPPF. However, it will be necessary to ensure that any later iteration of the plan is consistent with the outcome from the Statement of Common Ground that is currently being discussed by the HMA authorities. The statement in the plan that the unmet need has been redistributed and that it does not affect Charnwood is somewhat misleading. The issue of unmet need from Leicester City and its redistribution has yet to be determined. Discussion amongst the Housing Market Area (HMA) authorities are currently ongoing with a view to agreeing a Statement of Common Ground. Planning for more growth than the requirement represents positive planning as required by the NPPF. Charnwood will need to satisfy themselves that this level of over provision is appropriate and that it will ensure that the needs of the borough will be met without the need to redistribute development to elsewhere within Leicester and Leicestershire. However, the proposed approach is to be welcomed. 	further analysis of growth options. The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. Should there be any changes to the LHN due to revised figures from Government, then this will be factored into the plan-making process. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/177 Sue Green House Builders Federation	 LHN calculation is mathematically correct. But, should be kept under review and revised when appropriate. The LHN assessment is only a minimum starting point. The Council latest evidence of affordable housing need is 384 dwellings per annum which is a significant increase on the need previously identified in the adopted Core Strategy. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. An increase in the total housing figures may be considered where it could help deliver affordable housing. It is understood that Leicester City Council will be consulting on its Draft Local Plan in January / February 2020. This consultation will identify a shortfall of 7,813 dwellings to 2036 to be re-distributed through agreements with adjacent District Councils. The HBF note that the L&LSGP is a non-statutory document, which has not been subject to scrutiny at an examination. The HBF also understand that the non-statutory L&LSGP states that "the agreed distribution for the period 2011 – 2036 will be set out in a Memorandum of Understanding (MoU) which will be 	The LHN via the Standard Methodology takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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	 used as the basis for preparing or reviewing Local Plans with 2036 as an end date". This MoU has not yet been produced. To fully meet the legal requirements of the Duty to Co-operate the Council should engage on a constructive, active and ongoing basis with other L&LHMA authorities to maximise the effectiveness of plan making. The Charnwood Local Plan should be prepared through joint working on cross boundary issues. As set out in the 2019 NPPF (paras 24, 26 & 27) the Council should provide a signed Statement of Common Ground (SoCG) between itself and other L&LHMA authorities. The NPPG sets out that authorities should have a SoCG available on their website by the time of publication of the Draft Plan. It is vital that the Council agree a SoCG with other L&LHMAs authorities, which sets out an agreed position on housing needs and the meeting of any unmet needs arising from the city of Leicester up to 2036. A SoCG should be provided by the Council by the next consultation stage of preparation of the Local Plan. It is agreed that a flexible contingency should be applied to the overall HLS so that the housing requirement is treated as a minimum rather than a maximum. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a surplus but greater numerical flexibility is necessary if a Local Plan is highly dependent upon one or relatively few large strategic sites as is the case in Charnwood and / or specific settlements / localities rather than if HLS is more diversified. A contingency of only 7% (1,300 dwellings) as proposed by the Council is not considered significant nor sufficient. 	
EDCLP/194 Guy Longley Pegasus on behalf of Hallam Land Management	 'Low growth' development strategy is not sufficiently ambitious and there are concerns that the approach will not support local economic growth or ensure the delivery of sufficient housing. The Council has dismissed a high growth option due to perceived environmental impacts but has not properly tested a growth strategy that could provide a better balance between the socio-economic benefits of growth and potential environmental impacts. 	The SA has considered a range of growth options. None of the options have been dismissed, the high growth option was appropriately assessed, and the analysis demonstrates that the higher growth option has negative impacts on environmental objectives. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
EDCLP/252 Leicestershire County Council	• The initial transport evidence undertaken by Charnwood Borough Council helpfully highlighted the magnitude of transport impacts of differing growth options, both in terms of quantum and spatial focus. The evidence suggests that, in	Noted – the Council will continue to work with LCC to update and refine the evidence base, where necessary. Cumulative impacts of development have been, and will be, assessed

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	 overall terms, the levels of housing growth proposed in the draft local plan should be capable of being accommodated on the transport system over the plan period, subject to appropriate mitigation. However, with regards to the pattern and scale of development proposed, it will be important for the local plan to have strong policies around the identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives. 	and considered through the IDP and the ongoing work in the SA.
EDCLP/271 Lichfields on behalf of St Philips	 Object to the Council's choice to pursue a low growth rather than a high growth scenario. It is unclear as to how the additional provision of 1,322 dwellings has been derived and to what needs it accommodates. Further evidence is required to demonstrate whether an uplift of 1,322 dwellings is sufficient to address matters such as unmet need arising from the Housing Market Area ('HMA'), affordable housing, and infrastructure. LHN is a minimum starting point – and it is unclear as to how the Council has determined the proposed housing growth figure of 19,716. It is unclear as to how the additional 1,322 provision has been derived and to what needs it accommodates. Further evidence is required to robustly demonstrate whether an uplift of 1,322 dwellings is sufficient to address unmet housing need; affordable housing; and infrastructure. It is also worth noting the shortcomings in the Interim Sustainability Appraisal underpinning the Council's preferred option for a low growth scenario. St Philips consider it is unreasonable to conclude on a preferred growth option derived from the appraisal of two housing growth scenarios which do not reflect the local housing need as identified in the DCLP. The SA refers to the HEDNA's recommendation for an objectively-assessed need ('OAN') for 994 dpa or 24,850 dwellings between 2011 and 2036; whereas the local housing need figure of 1,082 dpa between the period 2019-2036 which represents an 8.8% to the OAN. Again, it would be considered unreasonable to use the OAN as a basis for testing growth options. St Philips therefore recommends that the Council rerun the appraisal in order to reasonably conclude on a preferred option which has been robustly tested. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. The LHN, via the Standard Methodology, takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The SA has considered a series of potential growth options. It is important to note as well as the 'low' and 'high' growth scenarios, the SA also analysed a 'hybrid' growth scenario. The SA has, therefore, assessed growth figures of 7,800 (hybrid), 8,100 (low), and 15,700 (high). Given the draft local plan is proposing a 'to be found' figure of 7,252, it is suggested that this is very similar to the hybrid option appraised – and that the SA of this growth options provides a comparable appraisal of the impacts that would be generated by the scale of growth proposed in the draft local plan. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be

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CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
CONSULTEE	 St Philips considers that the implications of the SGP have been incorrectly applied and t the need to test accommodating the unmet housing needs of Leicester City Council ('LCC') has been prematurely disregarded. The Council therefore risks not fulfilling its 'duty to cooperate' with neighbouring authorities. Clearly, the SGP commits the constituent HMA authorities to agree to a spatial distribution methodology through 'an agreed statement or Statement of Common Ground as appropriate' (page 27). The DCLP erroneously asserts that the SGP 'identifies how this unmet need will be redistributed in Leicestershire and it does not affect the number of homes we need to plan for in Charnwood' (paragraph 4.9). The need and purpose for a forthcoming agreed statement or SoCG is for this very reason: to agree on how LCC's quantified unmet need will be redistributed in Leicestershire. In the absence of such an agreed position, St Philips considers it is not yet reasonable for the Council to conclude that this matter does not affect its housing requirement figure. Distribution of unmet need should be dealt with via a spatial distribution methodology underpinned by a robust evidence base. A 'Functional Relationship and Gravity Model', should be prepared, which takes account of the below trends within the HMA: a) Migration patterns between authorities; b) Commuting linkages between authorities; c) Opportunities to capitalise on sustainable transport links; d) Affordability pressure; and e) The degree of environmental and physical constraints. Notwithstanding this position, St Philips recognises the approach to this issue taken by North West Leicestershire District Council ('NWLDC') in its current Local Plan Substantive Review. In a recent committee report, NWLDC Officers recommended that an uplit of c.12% to its LHN of 379 dpa would be appropriate to account for LCC's unquantified unmet need. More recently, an LCC committe	taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. The Council continues to refine and update the evidence base to support the local plan. Further work will include: IDP, Transport Modelling, Air Quality Assessment, as well as further revisions to the SA. The Council will revise the draft local plan, where necessary, should further evidence indicate that the strategy or sites selected need to be amended.
	through agreement with district councils' (paragraph 3.2). St	

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	•	Philips recommends that the Council now engages with its counterpart HMA authorities to agree on a distribution methodology to inform a Statement of Common Ground. LHN should be increased to help deliver the required number of affordable homes. St Philips raises significant concern that an uplift to the LHN has not been considered against the need to	
	•	deliver the required number of affordable homes. An increase to the LHN is likely given the identified need of 384 affordable dpa represents a considerable step change – approximately a 213% increase – compared with the previously identified need for 180 affordable dpa between 2011 and 2031 as evidenced by the 2014 SHMA underpinning the adopted	
	•	Core Strategy. In identifying this need, the DCLP states the 'most recent evidence identified a need for 384 new affordable homes a year in Charnwood up to 2036 which is a total of 6,528 homes over the plan period 2019-36' (paragraph 5.19). Although not explicitly stated, the Council appears to have drawn this from the Leicester and Leicestershire Housing and Economic Development Needs Assessment (GL Hearn, 2017) ('HEDNA')	
	•	which indicates a net need of 384 affordable dwellings per annum between 2011-36. Should this be the case, St Philips does not support the approach of drawing upon analysis from the HEDNA, which was notably published in January 2017, as opposed to undertaking a more up-to-date assessment of affordable housing need. St Philips considers that the Council should consider whether	
		an increase in the LHN figure for the District would be required to support strategic infrastructure improvements, such as the A46. An increase in the housing requirement could provide the funding required to invest in services and facilities and provide the funding required to improve and support the infrastructure packages identified in the SGP. Crucially, funding and investment are likely to be seen as significant limitations for delivery of local infrastructure projects. An increase in the delivery of housing, and thus private investment associated with	
EDCLP/274 Avisons obo Jelsons	•	this, can offer the funding necessary to facilitate this. First, in our Client's view the reference to 'low' and 'high' growth scenarios is misleading and confusing. This terminology has been carried over from the 'Towards a Local Plan for Charnwood' discussion paper, and uses evidence contained	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. The LHN, via the Standard Methodology, takes specific account of the

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	within the Leicester and Leicestershire Housing and Economic Needs Assessment (2017) as the starting point for its assessment of how much development would be needed in the Borough over the Plan period.	affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure.
	• The document also acknowledged that not all of the homes allocated in the adopted Charnwood Core Strategy and those with planning permission would be built by 2036 and as a consequence, it confirmed that the Authority would need to find	In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period.
	 land for a minimum on 8,100 homes if it were to meet its identified need (this was described as the 'Low Growth' scenario). The Paper went on to confirm that the Council's evidence indicated that allocating a greater supply of land, for up to 17,500 homes would maximize the network by maintaining. 	The SA has considered a series of potential growth options. It is important to note as well as the 'low' and 'high' growth scenarios, the SA also analysed a 'hybrid' growth scenario. The SA has, therefore, assessed growth figures of 7,800 (hybrid), 8,100 (low), and 15,700 (high). Given the draft local plan is proposing a 'to be found' figure of
	 17,500 homes, would maximise the potential for maintaining housing supply by providing flexibility to take account of changing circumstances (this was referred to as the 'High Growth' scenario. The NPPF provides that in order to determine the minimum 	7,252, it is suggested that this is very similar to the hybrid option appraised – and that the SA of this growth options provides a comparable appraisal of the impacts that would be generated by the scale of growth proposed in the draft local plan.
	number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market	As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
	signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA)
	 The Council's calculation of its housing need and supply is presented in Table 1 on page 18 of the Preferred Options paper. It confirms that the authority's minimum housing need is 18,394 (or 1,082 dwellings per year) over the Plan period. The table indicates that the Authority has a supply (comprising 	as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
	allocations and planning permissions) which equates to 14,464 dwellings which leaves land to be found to deliver 5,930 dwellings over the plan period.	The SUEs are an important part of the development strategy. All of the SUEs now benefit from planning permission, and there is confidence that the sites will deliver the proposed scale of housing.
	 Paragraph 4.14 of the Preferred Options paper explains that the Authority's preferred strategy, based on evidence, is to plan for a low growth scenario with a significant element of flexibility to take account of changing circumstances. This degree of flexibility is based on the Council's assessment of its evidence 	SoCG/MoUs have been agreed between the Council and the promoter of each SUE. These SoCGs/MoUs set out the delivery rates and expected delivery timetable for the SUEs.
	on housing need, delivery and site availability. This equates to	

CONSULTEE CONSULTEE CONSULTEE CONSULTEE CONSULTEE an additional 1,300 homes over the Plan period or 7% of its overall housing requirement. Whilst our Client supports the authority's approach of including an allowance for flexibility / resilience, it is firmly of the view that this figure is far too low and it would be more appropriate to allow for a much higher figure (at least 20% as recommended in the Local Plans Expert Group Report which was published in 2016) given the concerns it has about the overly optimistic assumptions that the Authority continues to make about the lead in times and delivery rates from the Sustainable Urban Extensions (SUEs). We discuss this in more detail in our response to question 3b below. In Jelson's view there is therefore no evidence to suggest that including a greater allowance for flexibility / resilience in its development strategy would give rise to any unacceptable adverse impacts. • In addition, it is not clear from the Preferred Options paper whether the Authority has explored if it would be necessary for it to increase its housing requirement in order to support economic growth. The Sustainability Appraisal Report (SA) prepared by AECOM in October 2019 assesses that each of the options at the higher level of housing provision are predicted to perform more positively in terms of socio-economic factors and that each option would generate significant positive effects in terms of housing provision and economic growth. It goes on to explain hat this would mainly be due to increased flexibility in housing provision, the corresponding increase in homes likely to be available to support economic growth and opportunities to provide investment in infrastructure improvements. This being the case, eleson would have expected the Authority to have either adjusted upwards the locally assesseed need to take of account of the socio
 expected in the north Leicestershire area); or, provide justified evidence which makes clear why it has discounted this option. Moreover, the Authority's preferred development strategy does take account of the proportion of Leicester City's unmet need (7,813 dwellings) it expects to take. In our Client's view it is not appropriate for the Council to proceed with its preferred development strategy addressed
and for the evidence underpinning any 'agreed statement' to be 97

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EDCLP/275 Define obo William Davis	 published and consulted upon. In our Client's view, it is simply not appropriate for this very important issue to be left to deal with through the Leicester and Leicestershire Strategic Growth Plan, which is non-statutory planning document. The Foreword to the Draft Local Plan (DLP) states that the Borough's location "in the heart of the three cities of Leicester, Derby and Nottingham brings with it great pressure for development." Consequently, the Borough should be considered in the context of the unmet housing needs of the three city councils. Indeed, the NPPF emphasises the Government's objective of "boosting the supply of homes" (paragraph 59) and requires strategic plan making authorities to establish a housing requirement figure for their whole area which shows the extent to which their identified housing need, and any needs that cannot be met in neighbouring areas, can be met over the plan period. It is, therefore, essential that the market and affordable housing needs arising in the plan area over the period to 2036 are identified and fully provided for in the DLP. This is particularly relevant in light of the ongoing uncertainty with regards to the apportionment of Leicester City Council's unmet housing need. The topic was discussed in the recent Leicester City Council Overview Select Committee (28 November 2019), with the Report of the Director of Planning, Development and Transportation. That identifies a housing need for LCC of 29,104 dwellings and a supply of 21,291 dwellings (which is considered to be somewhat optimistic) in the period 2019-36. Thus, a shortfall of 7,813 dwellings is anticipated; which "will be distributed through agreement with district councils." This uncertainty should be a core consideration for Charnwood Borough Council (CBC) in choosing the approach to determining the amount of development needed in the Borough and equirement in order to "provide sufficient flexibility to maintain a supply of housing land." However, WDL contend that the d	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. The LHN, via the Standard Methodology, takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The SA has considered a series of potential growth options. It is important to note as well as the 'low' and 'high' growth scenarios, the SA also analysed a 'hybrid' growth scenario. The SA has, therefore, assessed growth figures of 7,800 (hybrid), 8,100 (low), and 15,700 (high). Given the draft local plan is proposing a 'to be found' figure of 7,252, it is suggested that this is very similar to the hybrid option appraised – and that the SA of this growth options provides a comparable appraisal of the impacts that would be generated by the scale of growth proposed in the draft local plan. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HIMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. The SUEs are an important part of the development strategy. All of the SUEs now benefit from planning permission, and there is confidence that

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	 sufficiently and positively plan for the Borough's needs and, in particular, is not "sufficiently flexible to adapt to rapid change" as NPPF paragraph 11 requires. Furthermore, additional flexibility (beyond the 1,300 additional houses outlined in CBC's Preferred Option) should be afforded to take into account their dependence on large Sustainable Urban Extensions (SUEs) in the plan period to 2036. Draft Policy LP3 indicates that 8,475 dwellings are to be delivered between 2019 and 2036 via the three SUEs at Thurmaston, Leicester and Loughborough. This represents 46% of the supply required to meet the local housing need to 2036. The DLP itself recognises the negative implications of an overdependence on a small amount of large sites, with paragraph 4.13 stating that "it is important to consider that new sites may also take longer than the plan period to be completed and the long term build out rates of large sites have the potential to change due to unforeseen circumstances such as changes in the housing market or delays with overcoming site constraints." Indeed, all three SUEs have experienced delays even at the early stages of their application. North of Birstall SUE has been subject to drainage and flood risk concerns from the Environment Agency and Lead Local Flood Authority; with Highway Impact an ongoing contentious matter. Meanwhile, the granting of outline planning permission at Land West of Loughborough SUE was delayed by almost 3 years as a result of Section 106 Agreement negotiations. Finally, Land North East of Leicester SUE is dependent on considerable infrastructure, namely the Southern Access that will be subject 	OFFICER RESPONSE the sites will deliver the proposed scale of housing. SoCG/MoUs have been agreed between the Council and the promoter of each SUE. These SoCGs/MoUs set out the delivery rates and expected delivery timetable for the SUEs.
	 to Leicester City Council's determination. Evidently, therefore, there is a need to ensure that the supply of housing meets the Borough's local housing need in any eventuality. The dependence on three large SUEs does not provide such certainty, and thus it is WDL's contention that further flexibility is required for the plan to sufficiently meet the Borough's housing needs, both through the allocation of additional sites and by applying a higher contingency to the overall housing land supply, to ensure that the local housing need is recognised and treated as a minimum rather than maximum figure. 	
EDCLP/276 •	The Draft Plan seeks to pursue a 'low growth' development	The Local Housing Need is derived from the Standard Methodology, this

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Pegasus obo Wilson Enterprises	 strategy for the Borough, planning for a local housing need of 1,082 homes a year (18,394 homes to 2036) based on the standard methodology calculation. This is not a sufficiently ambitious strategy and there are concerns that the approach will not support local economic growth or ensure the delivery of sufficient housing. The Council has dismissed a high growth option due to perceived environmental impacts but has not properly tested a growth strategy that could provide a better balance between the socio-economic benefits of growth and potential environmental impacts. The Council should undertake a further appraisal of a medium growth development option. 	 represents the starting point for the growth strategy. The LHN, via the Standard Methodology, takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The SA has considered a series of potential growth options. It is important to note as well as the 'low' and 'high' growth scenarios, the SA also analysed a 'hybrid' growth scenario. The SA has, therefore, assessed growth figures of 7,800 (hybrid), 8,100 (low), and 15,700 (high). Given the draft local plan is proposing a 'to be found' figure of 7,252, it is suggested that this is very similar to the hybrid option appraised – and that the SA of this growth options provides a comparable appraisal of the impacts that would be generated by the scale of growth proposed in the draft local plan. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
EDCLP/277 RPS obo Bellway Homes	 The spatial strategy includes an A46 growth corridor around the south and east of Leicester terminating in the south east of Charnwood, and an International Gateway in the area around the confluence of the A42 and the M1 motorway. As part this managed growth on the edge of Leicester's urban area, the Borough using the 2014-based SNHP, is looking to add an additional 1,300 homes on top of the 5,930 to be found to meet the requirement of 1,082 dpa (totally 18,394), and is consulting upon the low and high growth scenarios. Bellway broadly agree that the SUE commitments should be saved but are concerned about the slow delivery rate from the SUEs, and question whether the level of housing growth given the housing needs in this area, is sufficient. Local Housing Need for Charnwood has been calculated using the standard methodology and shows a need for 1,082 new 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. The LHN, via the Standard Methodology, takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The SA has considered a series of potential growth options. It is important to note as well as the 'low' and 'high' growth scenarios, the SA also analysed a 'hybrid' growth scenario. The SA has, therefore, assessed growth figures of 7,800 (hybrid), 8,100 (low), and 15,700

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	 homes pa for the period 2019-2036. This totals 18,394 homes. Table 1: Housing Need and Supply 2019-36 (page 18) looks to find an additional 5,930 homes for 201936, based on 1,082 dpa. This ignores the fact that housing supply since 2011 has been significantly short of even meeting the 820dpa requirement of the 2015 Core Strategy. The Council's 2017/18 AMR illustrates that an average of 772dpa have been delivered in the 7 years since 2011. There is therefore an undersupply with 5,406 homes completed against a target of 5,740 since 2011. Whilst, the Council state that this undersupply would be accommodated within future forecasts, a low growth scenario, even lower than the originally anticipated low growth scenario of 8,100, would put this at risk and is contrary to the government aim to significantly boost the supply of homes. Although the greater number of homes/high growth scenario is supported, further evidence is needed as there is an absence of reliable up-to-date information, particularly on housing delivery. An up to date housing trajectory needs to be provided to ensure it is justified and sound in light of the evidence. There is, for example, considerable concern that the SUEs can deliver at rates anticipated within the Housing Capacity Study scenarios, which each anticipate the North East of Leicester SUE delivering at in excess of 200dpa every year up to 2036. This subsequently makes it difficult to understand whether the low growth option is in accordance with national planning policy, and a sound approach to be applied, and whether much greater flexibility is required. The basis for the OAN of 1,082dpa is in many respects unclear and the Council will be aware that the local housing need figure is a minimum requirement in accordance with para.11 of the NPPF. The HEDNA figure of 1,280dpa would seem a more reliable starting point and is necessary to support economic growth and meet affordable housing needs which have become more acutely required. Importantly	 (high). Given the draft local plan is proposing a 'to be found' figure of 7,252, it is suggested that this is very similar to the hybrid option appraised – and that the SA of this growth options provides a comparable appraisal of the impacts that would be generated by the scale of growth proposed in the draft local plan. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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	 Furthermore, to fully meet the requirements of the Duty to Cooperate the Council should be working on an ongoing basis with other authorities in the Leicester and Leicestershire HMA to meet the full OAHN for the HMA. The declared unmet need for Leicester City of 7,813 homes means the draft Plan is contrary to the NPPG which requires there should be sufficient certainty through formal agreements demonstrating an effective strategy will be in place to deal with strategic matters such as unmet housing needs. There is currently no agreement between the Councils as to where the unmet need should be provided. The non-statutory Draft Leicester and Leicestershire Strategic Growth Plan (L&LSGP) states that this will be set out in a Memorandum of Understanding (MoU). This has not been forthcoming and is delayed until after the publication of a draft Local Plan for Leicester which is yet to happen. The end date of the Charnwood Local Plan is 2036 as the L&LSGP cannot be relied upon until after 2036, and as such is a matter the Council's own assessment (SoCG) reflecting the most up-to-date position of joint working also needs to be published with the next consultation stage of draft Local Plan. We agree with the Council's own assessment (para.4.13) that a higher growth scenario would aid delivery and be of benefit to maintaining a five-year supply, particularly if this were made up of more smaller sites. We see no evidence that this option will lead to environmental harm that cannot be mitigated. The Second Interim SA appears to endorse this. To ensure flexibility and ensure that draft LP is effective in meeting the housing needs of the Borough and is positively prepared and based on a strategy which seeks to meet all objectively assessed development and infrastructure requirements, including unmet requirements, the high growth scenario is the only realistic option. 	
EDCLP/278 Savills obo Mr and Mrs Grainger	Chapter 4 starts off by setting out the amount of housing to be developed over the plan period. The new Local Plan suggests a housing figure of 1,082 pa, equating to 18,394 homes over the plan period 2019-2036. Charnwood correctly use the Government's Standard Housing methodology as a starting point and then through their 'Towards a Local Plan for Charnwood' (April 2018)	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. The LHN, via the Standard Methodology, takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure.

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	 discussion paper discuss high and low growth options. Yet, it should be emphasised that Charnwood is well situated with key spatial links to the motorway (M1), close to Nottingham and Leicester and rail links to London and as such provides a fundamental opportunity to deliver job and housing growth to support Leicestershire. Its position is crystallised within the Leicester and Leicestershire Strategic Growth Plan which sets out the aspirations for delivering growth until 2050 in the context of the duty to cooperate. The ambition of the Growth Plan is "two fold; to overcome the problems that are experienced by existing communities and to accommodate growth in high quality developments". However the council still come to the conclusion that the lower level of growth should be pursued. As a result there is only an additional 1,300 homes above the Local Housing Need (LHN) for the plan period. While we recognise the arguments presented for this approach, including the greater environmental impact and cost of providing infrastructure for such growth, there is now greater risk that the Council will fail to maintain a five year supply of deliverable sites. Charnwood also run the risk of redirecting the investment which would otherwise have been brought in to the district as a result of pursuing the higher growth scenario having 'signed up' to the 2019 Strategic Growth Plan. In adopting a 'policy off' Standardised Methodology approach this is overly simplistic. If continued, there is a fundamental danger that the Local Plan will be found unsound by the Inspector and CBC asked to revise its housing targets upwards accordingly. This issue has recently been raised at the Calderdale Local Plan Examination. Whilst submitted under transitional arrangements the provisions of more recent policy apply. Within this it references the NPPF paragraph 60 which confirms the approach to using the Standardised Methodology: "To determine the minimum number of homes needed, strategic	In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The SA has considered a series of potential growth options. It is important to note as well as the 'low' and 'high' growth scenarios, the SA also analysed a 'hybrid' growth scenario. The SA has, therefore, assessed growth figures of 7,800 (hybrid), 8,100 (low), and 15,700 (high). Given the draft local plan is proposing a 'to be found' figure of 7,252, it is suggested that this is very similar to the hybrid option appraised – and that the SA of this growth options provides a comparable appraisal of the impacts that would be generated by the scale of growth proposed in the draft local plan. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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	approach which also reflects current and future demographic trends and market signals." (Our emphasis)	
	Planning Policy Guidance provides further guidance on this interpretation, stating:	
	"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicatesCircumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:	
	• Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);	
	• Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or	
	An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;" (Paragraph 2a-010) (Our emphasis)	
	The Inspector then discusses the areas of inconsistency in turn. These being:	
	• The commitment to the LCR Growth deal and £1bn+ fund, having knock on 'policy on' implications for employment land distribution;	
	• The Employment land distribution which at 73 Ha is 'policy on', requiring commensurate housing growth to support and house the increase in jobs, prosperity and inward investment; and,	
	• As a result the need to increase the growth by c. 20% over and above the standard method derived housing target of 820 dpa.	

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	All of the above points apply to Charnwood. Charnwood is committed to the Leicester and Leicestershire Growth Strategy which at page 4 states:	
	"Leicester & Leicestershire has huge potential for growth. Located at the very heart of the UK, with a population of over 1 million, a thriving and vibrant city, distinctive and characterful market towns, three universities and an international airport, our economy contributes some £23bn to the UK economy. We have much to offer in terms of quality of life. We want to play our part in developing the UK economy, improve productivity and create the conditions for growth. We want to increase the speed of housing delivery, remove the barriers that have slowed progress to date, and ensure that there is a good supply of new housing for people who need it. We also want to protect the places and features that make Leicester & Leicestershire special."	
	From this similar key 'policy on' implications flow in respect of employment land and economic growth but unsoundly not housing growth to match. It is further noted that these figures flow from the 2017 Charnwood Delivery Evidence Paper, do not consider the 2019 Growth Strategy and therefore the evidence base is currently inadequate.	
	Recommendation 1: Review the evidence with regards to the 2019 L&L Growth Strategy to ensure a sound evidence base with a view to including a higher growth level of c.30,000 homes over the plan period to match the 'policy on' approach being taken elsewhere. In the interests of positive and effective plan making.	
Q3b		
DCLP/16 Dr Catharine Ferraby	It depends where the housing is planned. It's not a good balance if it destroys the environment. Could brownfield sites be developed? Will the houses just create an endless suburb between Leicester to Loughborough? Will house builders actually deliver schemes to provide amenity to the Borough and preserve the environment and does the council have the capacity to provide oversight of developers ' activities. I live on a new build estate and our developer has not yet delivered what they promised. I.E. G. playing area, wildlife refuges.	The overall strategy for growth is one of urban concentration and intensification. Policy LP1 specifically identifies making the efficient use of land including brownfield or underused land and buildings. The Council maintains a Brownfield Land Register that is used to ensure brownfield sites can be easily identified and come forward for development.
DCLP/142 and DCLP/305	• The evidence for the decision to (a) go for the delivery of the minimum estimated housing need and (b) the reason for 1,300	The SA has considered a series of potential growth options. It is important to note as well as the 'low' and 'high' growth scenarios, the SA

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County Councillor Max Hunt	 extra is not clear. There is no explanation of the 'high growth options', other than the presumption that they somehow match the scenarios in 4.28. There is a huge gap between the 7,252 proposed and the unexplained higher growth figure of 15,700. Given that the higher figure would provide the 'resilience and flexibility of supply', what risk is sustained by the lowest figure? The minimum stated in the discussion paper last year of 8,100 makes the choice below that - of 7,252 - more questionable against 15,700. To demonstrate sound plan based on evidence the authority will have to demonstrate this is more than a political decision masked by "evidence around" various conflicting arguments. Given the lack of progress with the previous Local Plan, it would be prudent to fix a higher figure which would provide evidence of resilience, flexibility of supply and also economic benefits (see 3.4). It is essential that the Plan enables as many brownfield sites to be redeveloped as possible. There is a tacit assumption, in the question above, that 'flexibility' relates to high growth and 'environment' relates to low growth. Flexibility will depend upon a number of factors. Equally protecting the environment doesn't only mean preserving biodiversity in the countryside. Adaption to the challenge of climate change is pivotal in how we protection of the environment and the plan is rather weak in that regard. 	 also analysed a 'hybrid' growth scenario. The SA has, therefore, assessed growth figures of 7,800 (hybrid), 8,100 (low), and 15,700 (high). Given the draft local plan is proposing a 'to be found' figure of 7,252, it is suggested that this is very similar to the hybrid option appraised – and that the SA of this growth options provides a comparable appraisal of the impacts that would be generated by the scale of growth proposed in the draft local plan. The high growth scenario, when analysed through the SA, showcased significant positive effects for housing, as well as positive effects for the local economy and deprivation. But, it also showcased a number of significant negative impacts on landscape character, soil resources, historic environment, and air quality. Considered against the alternative growth scenarios, the high growth option performed less well, and, under comparison, is clearly the option with the fewest positive effects, and the greatest number of negative effects. As such, the Council considers this growth scenario would not deliver sustainable development in the borough. The overall strategy for growth is one of urban concentration and intensification. Policy LP1 specifically identifies making the efficient use of land including brownfield or underused land and buildings. The Council maintains a Brownfield Land Register that is used to ensure brownfield sites can be easily identified and come forward for development. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
DCLP/151 Mr David Campbell-Kelly	 Needs to be flexible to deal with an appropriate and fair allocation of Leicester City's unmet need ie not as proposed in the unfair allocation contained in the SGP. 	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground
DCLP/217 Professor David Infield	Some excess is required but 1,300 seems excessive.	Noted.
DCLP/245	Why plan for additional homes when the infrastructure,	Noted - The Local Housing Need is derived from the Standard

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Mrs Julie Glover	particularly roads, schools, health and social care, cannot support the current population?	Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period.
DCLP/280 Harborough District Council	 Reference to the SGP is welcomed in para. 4.9. However, at the time the SGP was finalised the scale of unmet need to 2036 from Leicester City was unquantified. The SPG identifies a vision for growth within Leicester and Leicestershire and broadly identifies how housing will be distributed. It indicates that that the number of homes that Charnwood needs to plan for is unlikely to be affected. However, it will be the Statement of Common Ground that will identify how this unmet need will be distributed across Leicestershire. Table 1: Not clear where supply sub-total 14,464 comes from. 	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. The 14,464 listed in Table 1 is a typographical error. The table should read as '12,464.
DCLP/301	The listed housing supply figures give a total of 12,464. (Officer comments)	Noted – support is welcomed.
Mr Phil Sheppard	• Yes, I suppose I do support the 1,300 homes flexibility.	Noted – support is welcomed.
DCLP/333 Sturdee Poultry Farms Ltd (Mr John Wheeler)	• There is a recent strategic housing market assessment that has indicated a much higher minimum need figure that the standard methodology. In addition to this, it is not clear why the figure of 1300 has been chosen. It is not justified by reference to the need to provide for affordable housing or the impact of the economic policies in the plan. It does not even add up to the 8100 figure tested by the Sustainability Assessment to which there is no evidence of any constraint to its delivery.	The HEDNA is a useful document that provides some effective analysis of the housing and labour market across Leicester and Leicestershire. However, the NPPF and PPG require that the Local Housing Need is derived from the Standard Methodology, as this represents and an unconstrained assessment of housing need. It is the LHN figure which represents the starting point for determining the housing requirement for the area.
		In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period
DCLP/388 Dr Martin Field	• The number of 'additional homes each year is masked by the actual dynamics of performance on the ground and in the workings of the local property markets. It is evident from the practices of the housing development and house-building sector that there has not been an adequate means of controlling 'flexibility' in the past - in order to protect the local environment (i.e. social and natural environments) there needs to be greater	The SHLAA provides an assessment of a range of sites across the borough. The sites are assessed based on constraints, and other matters pertaining to the site's suitability, achievability, and availability. These considerations allow the sites to be judged whether they are deliverable and developable. All of this information gives confidence as to when sites will be delivered, and the build-out rates that can be achieved.

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	requirements placed on building out given planning approvals within tightly specified periods, in order that landowning and development interests (to delay some sites) are not enabled to agitate to have additional sites approved in the same Plan period that were never intended to come on-stream at the same time.	Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned.
LDCLP/02 Anonymous	• Yes	Noted – support is welcomed.
LDCLP/22 Anonymous	 No, I feel we should building the minimum. No matter how many are build the government will always come back and demand more. Building to minimum gives scope if this happens later. 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period.
LDCLP/51 Anonymous	 No, we have to stop the constant build build at some point and use what we have better and regenerate to help of set our environment destruction long term 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The SA process ensures that proposed growth options and potential development sites are appraised robustly, and that the best performing growth options and sites are selected to be included in the local plan.
EDCLP/31 Barkby & Barkby Thorpe Parish Council	 Barkby & Barkby Parish Council are aware that the planners have to abide by population projections supplied to the council by the government but understands the government insists on using the penultimately published figures rather than the most recent which show a significant reduction in the rate of increase of the population. Is it therefore sensible for Charnwood to build in a buffer of 1300 houses over and above the housing need figures which may well already be inflated? Removing them could reduce the number of areas zoned for development e.g. HS8, HS9, and HS6. 	The Government is requiring Councils to use the 2014-based household projections within the standard method to provide stability; and ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. Furthermore, the Government is clear that any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework.
EDCLP/32 BABTAG	 BABTAG is aware that the planners have to abide by population projections supplied to the council by the government but understands the government insists on using the penultimately published figures rather than the most recent which show a significant reduction in the rate of increase of the population. Is 	

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EDCLP/34 Cllr Mary Draycott	 it therefore sensible for Charnwood to build in a buffer of 1300 houses over and above the housing need figures which may well already be inflated? Removing them could reduce the number of areas zoned for development e.g. HS8, HS9, and HS6. I do not agree that the extra housing being proposed 7300 should be added to existing settlements. Neither do I agree that this new housing is being expanded out of agreed boundaries for development such as for Shepshed. 	 Furthermore, the Government is clear that any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. Shepshed is identified within the "Urban Settlement" category – along with Birstall, Syston, and Thurmasaton. The settlement hierarchy has been defined based upon the services and facilities available in these locations, and their ability to facilitate sustainable development. The growth directed to Shepshed reflects the evidence of landscape and transport capacity and supports the Leicestershire International Gateway set out in the SGP.
EDCLP/36 Mr & Mrs Atkins	• We are aware that the planners have to abide by population projections supplied to the council by the government but understands the government insists on using the penultimately published figures rather than the most recent which show a significant reduction in the rate of increase of the population. Is it therefore sensible for Charnwood to build in a buffer of 1300 houses over and above the housing need figures which may well already be inflated? Removing them could reduce the number of areas zoned for development e.g. HS8, HS9, and HS6.	 The Government is requiring Councils to use the 2014-based household projections within the standard method to provide stability; and ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. Furthermore, the Government is clear that any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework.
EDCLP/43 Mr & Mrs Cunningham	• We are aware that the planners have to abide by population projections supplied to the council by the government but understands the government insists on using the penultimately published figures rather than the most recent which show a significant reduction in the rate of increase of the population. Is it therefore sensible for Charnwood to build in a buffer of 1300 houses over and above the housing need figures which may well already be inflated? Removing them could reduce the number of areas zoned for development e.g. HS8, HS9, and HS6.	 The Government requires Councils to use the 2014-based household projections within the standard method to provide stability; and ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. Furthermore, the Government is clear that any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework.
EDCLP/55	Insufficient justification for the 1,300 additional homes. 1,300	The Local Housing Need is derived from the Standard Methodology, this

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Sileby Parish Council	 not distinguished and could be distributed throughout the plan area. Draft CLP proposed new housing allocations on several large greenfield sites outside the established Limits to Development boundaries. Sileby NP has identified a number of reserve sites and has a policy to guide the release of those sites should the identified housing need for the NP area increase throughout the plan period. Draft CLP should include a policy for reserve sites and how these would be released during the plan period. 1,300 additional homes has not been justified and therefore proposed housing allocations equivalent to this number should be removed. Proposed allocation of Site SH64 (land off Barnard's Drive) should be deleted; and the reserve sites identified in the Sileby NP should be preferred. 	represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The preferred distribution of new homes is set out in Table 4 of the draft local plan – and Shepshed has a provisional allocation of 2,871, which represents a 15% share of the housing provision.
EDCLP/74 Mr Hussain	 NP should be preferred. There literally is no requirement for the building of 1,300 homes at all if proper considerations were made in terms of the delivery and speed of delivery of adequate social housing; this then obviates the requirement for disrupting the community's access to all relevant amenities within proximity of any such proposed development that also makes unnecessary the acquisition of additional land for social housing allocation development. We have large construction firms already building properties all over the country, there is no shortage of housing if the current housing stock both in the private sector & the public sector were used & modernised/retrofit to comply with today's building regs standard for modern day social housing purposes. Adequate social housing is not necessarily newly built housing especially pointless newly built, socially stratified rabbit hutches that to a great extent fail to address modern day requirements for normal family and social life. Unless anybody has noticed, there is a major housing crisis going on all around us and there are many forms of it and the way to tackle it, is for the LA to actually, actualise itself in front of the whole of the community and take charge of the situation instead of creating avoidable & completely unnecessary workloads that don't even fulfil the genuine needs of families nor will they be delivered in a timely and efficient manner. 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The Council will work alongside the development industry to achieve the strategy set out in the local plan. Policy LP6 will ensure that an appropriate housing mix, that needs a variety of needs is delivered.

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	•	all areas of stagnation, addresses mental health and stress related factors for families living in squalid conditions.	
EDCLP/107 Rosconn Strategic Land	•		 The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,300 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. The Council will be preparing a housing trajectory as part of the next version of the draft local plan.
		444	Proposals for the SUEs are supported by SoCGs between the

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	•	10-20% would give rise to an unacceptable level of environmental harm, but would clearly help provide a greater level of flexibility to address the concerns raised within the Housing Delivery Study and other evidence base documents. There is significant reliance placed upon large, strategic sites within the current housing land supply, with the 3 allocated SUEs contributing almost 60%. Any further delay in these and other committed and/or draft allocated sites during the plan period will have a significant impact upon supply. The Draft Charnwood Local Plan proposes the provision of an additional 1,300 dwellings without explanation as to why other options that exist between this lower level and higher levels of growth cannot be considered. Without such assessment, the Council have failed to consider other reasonable alternatives that may well not give rise to unacceptable environmental effects but which can provide a greater level of certainty that the housing needs of the Borough will be delivered during the plan period. RSL therefore consider that a larger buffer of at least 15% should be provided. In order to achieve this, further housing allocations will need to be identified and these should principally comprise small to medium sized allocations in order to provide the flexibility in housing land supply that is required.	 developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. The SA considered a series of potential growth options. It is important to stress that the growth options assessed in the SA are "to be found" figures, i.e. additional growth, having taken account of the extant Core Strategy allocations, and current planning permissions and commitments. As such, the SA considers potential "to be found" growth figures of 7,800 (under the Hybrid option), 8,100 (under the Low option), and 15,700 (under the High option). This array of growth options, along with the various Scenarios for where this growth could be accommodated, are considered to represent an appraisal of reasonable alternatives. The proposed "to be found" growth figure presented in the draft local plan is 7,252. This figure is very similar to the 7,800 figure appraised under the Hybrid option. As such, the Council is confident that the proposed growth option has been appraised and that reasonable alternatives have been explored. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
EDCLP/108 Sue Barry	•	No to 1300 additional homes and stopping building on Greenfield sites to protect the environment. Landlords Rental properties the monopoly of properties bought for rentals, do you think that these are properties that could be affordable for people wanting to get on the housing ladder? Such as smaller homes which are good starter homes, Terraced houses which could be refurbished. There could be a limit to how many houses Landlords own, to enable release of affordable properties to buy.	Policy LP4 sets out the draft policy for the delivery of affordable housing; and Policy LP6 sets out the draft policy for ensuring there is an appropriate mix of housing types, tenures, and sizes across the borough. Together these policies will help to ensure there is a range of housing types delivered across the plan period.
EDCLP/121 Marie Birkinshaw	•	Yes, it does seem to strike the right balance if the housing predictions are correct; however it is important to recognise in view of the State of Nature Report 2019 that urbanisation and in fact any additional form of development by its very nature causes interference in ecosystems and habitats and that these cannot always be simply moved or replaced. Any development needs to be handled with great care and based on scientific	The sites in the draft local plan have been assessed through the SHLAA, with potential impacts on the natural environment taken into account in the documenting of site-based constraints. Furthermore, the SA process has appraised each site to understand the potential impacts on a range of environmental objectives.

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	information. It has also been very apparent in existing and previous developments that developers often ride roughshod of nature's requirements to better serve their own purposes. Care for wildlife and habitats during work on development is key also.	
EDCLP/125 Tim Birkinshaw	 I think this gives sufficient 'headroom' to ensure flexibility. A few more (up to 1,500) by making better use of land, would be acceptable. 	Noted – support is welcomed.
EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	 We would suggest that a low-growth scenario with only a 7.2% buffer above minimum requirements falls some way short of being aspirational. Higher levels of growth within Charnwood Borough are clearly deliverable and will support wider economic objectives whilst also contributing to the Government's stated objective of significantly boosting the supply of homes. Charnwood should increase the LHN figure to take account of Leicester City's unmet need. Leicester City has recently confirmed an unmet need of 7,813 dwellings in the period to 2036, which therefore needs to be met within other authorities in the Leicester and Leicestershire Housing Market Area (HMA). It is understood that no Statement of Common Ground has yet been drafted, as it was pending Leicester City's confirmation of their unmet need. Notwithstanding the absence of a Statement of Common Ground, the draft Local Plan states that the Strategic Growth Plan identifies how the City's unmet need will be distributed, resulting in no requirement for an uplift to the number of homes to be delivered in Charnwood. We would challenge the extent to which a non-statutory plan which underwent only a single consultation and has not been subject to formal testing at examination forms an appropriate basis for binding the strategy and policies of future Local Plans, especially as it was drafted at a point when the extent of unmet need had not been established. The SGP, whilst commendable, cannot override the Duty to Cooperate and Statements of Common Ground which are required as part of formal plan-making process. LHN should be increased to support delivery of affordable housing – with reference to the net annual need set out in the HEDNA. Draft Policy LP4 proposes a target of 30% affordable housing to the state of a state of a	per annum requirement. However, the economic-led housing need figure serves as a useful reference point for determining whether the number of dwellings identified for Charnwood would support a healthy economy and maintain a residence-based workforce. Given the draft local plan strategy
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	 be delivered from new housing developments, but even if every site were to deliver this 30% target, this would still only provide 348 affordable homes per annum, leading to a shortfall in 612 affordable homes over the plan period. Given that affordability in Charnwood has worsened progressively for many years, it is imperative that significant weight is given to this issue, and that meeting affordable needs in full forms a cornerstone of the new Local Plan. Furthermore, a low growth option will jeopardise the ability of the Borough to meet the needs of its future labour market, hindering economic prosperity, and/or leading to increased levels of in-commuting, placing increased burden on transport infrastructure. The Council have included a contingency of 1,300 dwellings in order to ensure some flexibility in the plan. However, this equates to only 7.2% more than minimum requirements, which is considered insufficient to ensure the required certainty of a plan-led approach to meeting local needs. Higher growth would lead to greater flexibility in meeting local needs, and in maintaining a 5-year supply of deliverable housing land. The ability of the market to deliver a higher level of housing is shown by the Housing Delivery Study (2017), prepared on behalf of the Council by BBP Regeneration in support of the Local Plan. It concludes that all 4 of the modelled scenarios provide enough available and achievable land to meet identified housing need to 2036, with these models considering estimated delivery for the period 2017/18 – 2035/36 ranging from 23,253 to 25,828 dwellings, with delivery peaking at between 1,497 and 1,679 dwellings per annum. This is assisted by the availability of land in the areas of highest demand capacity at Loughborough and the fringe of Leicester City. The Local Plan's final housing requirement figure should be expressed as a minimum, not a maximum. These are the minimum levels of development which Charnwood must achieve within	delivered across the plan period, there is confidence that the growth scenario will achieve economic growth. The LHN via the Standard Methodology takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure.
EDCLP/143	• We do not agree with the proposal for an additional 1,300	Guidance in the NPPF and PPG is that development strategies should
CPRE Leicestershire	 homes over the plan period to achieve flexibility. Proposal is unnecessary as 'windfall' and brownfield sites will 	not become reliant on windfalls. Further evidence will be prepared to indicate whether a windfall allowance is necessary in order to define an
and its	come forward. The consequence of this flexibility provision is	appropriate development strategy.

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Charnwood District Group	that greenfield sites will be allocated at the start of the plan and will then be found to be unnecessary in terms of the numbers. The result will be loss of countryside and disincentive for windfall and brownfield sites to come forward.	
EDCLP/152 Adam Murray Andrew Granger & Co Ltd obo landowner clients	 Support proposed development strategy. It is rational for development to be directed towards the edge of Leicester, and other locations within the Borough, where there is good access to employment opportunities and local services and facilities. As previously outlined, we consider Thurcaston to have relatively good access to services and facilities and therefore capacity to accommodate development at an appropriate scale. As such, we support its identification as an 'Other Village' within the draft settlement hierarchy. However, we do not agree with the quantum of residential development set out within the draft policy. The Draft Local Plan does not include a sufficient buffer to accommodate any substantial delays in the delivery of homes at the identified housing allocations. The Draft Local Plan is ambitious with the strategy for residential development; approximately 43% of the housing land supply is to be delivered at 3 strategic Sustainable Urban Extensions [SUEs]. Given the high level of infrastructure that is required to be implemented prior to the delivery of housing at large strategic developments, there is often a substantial lead in time between their initial identification and the first delivery of housing. The Council will be well aware of the Nathaniel Lichfield 'Start to Finish' report, which states that the average lead-in time from first identification to first housing delivery on a strategic site is between 5.3 and 6.9 years. Suggest it would be required to achieve the following annual average delivery rates in order to deliver their plan period requirements: North of Leicester – annual delivery of 221 dwellings; West of Loughborough – annual delivery rate of 150 dwellings. 	 The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,300 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. The overall development strategy is one of urban concentration and intensification, ensuring that future development is focussed towards more accessible locations with greater provision of facilities and services, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned.
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	 The 'Start to Finish' report states that the averag delivery rate on strategic sites of 2,000+ dwelling approximately 161 dwellings per annum. Consequentum of housing proposed on these sites with period, and as such, an additional buffer is require accommodate any possible shortfall. In addition, it is our view that Charnwood Boroug a modest record of housing delivery within the la Council have had a less than 5 year housing land recently as 2017. Therefore, we believe it is nece Local Plan to include an appropriate buffer to gua continued record of under-delivery of housing. Consequently, it is our view that it is necessary for Local Plan to include a minimum 10% supply-sid accommodate for any under-delivery of housing proposed allocations. Thus, based on the Local I being identified as 18,394 dwellings, the Local P include a supply-side buffer of 1,839 dwellings. As such, it is our view that land needs to be idea additional 500 dwellings over and above the cur housing allocations. It is within this context that allocation of land west of Anstey Lane, Thurcas residential development. 	s is juently, it is our deliver the hin the plan red to h Council have st 3 years; the d supply as essary for the ard against any or the Draft e buffer to at the Housing Need an should htified for an rrent draft we propose the
EDCLP/165 Dr S.J.Bullman	 If you ensure developers put in place the association housing elements that go along with increased represence in the developments, then yes. That means schools, local shops, local amenity a youth clubs/local meeting/club rooms, pubs etc & developments required to deal with increase traffic have never witnessed the full range of such in the have seen passed in recent times. 	esidentialthrough the use of a number of policies in the draft local plan.areas such as a all roadDraft Policy LP25, LP26, LP29, LP30, LP31, LP32, LP33, LP34, and LP35 – all require provision and/or enhancement of infrastructure to ensure that proposals represent acceptable and sustainable
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	The Draft Plan proposes to include a further 1,30 achieve flexibility. This is only a 7% allowance at housing requirement of 18,374 homes. This does sufficient flexibility to allow for changing circumst including the potential under-delivery on committ proposed allocations.	IO homes to pove the s not representThe LHN represents the starting point for housing need in the borough.However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term

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	 The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from the carried forward SUE allocations and uncertainties in delivery from the proposed allocation sites set out in Draft Policy LP 3. Evidence on progress on large sustainable urban extensions suggests these assumptions remain ambitious. A study by NLP, How Quickly do Large Scale Housing Sites Deliver, 2016, found that for sites of 2,000 homes or more, an annual delivery rate of around 150 homes per annum may be a more realistic assumption on build rates. Lubbesthorpe SUE in Blaby District, a peak delivery of 170 dwellings a year to date also suggests that the Council's assumptions are ambitious. Part of the supporting evidence for the Draft Plan is the Charnwood Housing Delivery Scenarios Report by BWB, December 2017. This assumes an annual rate of 160 dwellings a year for North Birstall. These figures were based on developer input. On this basis it is considered a more realistic assessment would be the delivery of 2,300 homes at the North East Leicester SUE, 2,380 homes at West Loughborough and 1,950 homes at North Birstall – a reduced total of 6,630 homes. As a result of this more realistic assessment of delivery, a further 1,845 homes will need to be identified through further allocations. 	 Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned.
EDCLP/191 Stephen Harris Emery Planning on behalf of Hollins Strategic Land	 The plan makes provision for at least 19,716 new homes, of these homes, the Council calculate that at least 945 dwellings (5%) shall be within fourth tier settlements referred to as 'other settlements'. Having established that an alternative approach to applying the minimum should be applied, paragraph 2a-015 of the NPPG provides the following in relation to how such an approach would be tested at examination: "If authorities use a different method how will this be tested at examination? Where a strategic policy-making authority can show that an alternative 	 The paragraph of the PPG referenced relates to those occasions where a local authority chooses a completely different methodology to determine housing need. This is not the case in Charnwood. The Council has established an LHN through following the Standard Methodology. This has established a need figure of 1,082 per annum. The draft local plan references and uses this figure. However, the draft local plan is intending to provide for an additional 1,300 new homes, across the plan period, in order to give flexibility. This

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	 approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point." So, it is not simply the case, therefore, that a figure higher than the minimum starting point will be considered sound. It is necessary to demonstrate that the alternative method adequately reflects current and future demographic trends and market signals. In the case of Charnwood, we consider it is necessary to have that element of flexibility as the Local Housing Need figure is the starting point as it is only based on demographic change and the affordability ratio and support its inclusion. The 2017 SHMA demonstrated a range of other factors which can have an impact on housing need, such as market signals, economic growth, local affordable housing need, a reliance on large strategic extensions and delivery in the urban area. The additional flexibility equates to an additional 7% dwellings per annum, although the total figure is lower than some of the outcomes of the SHMA for example Table 5 where the Notional Housing Need to deliver the Affordable Housing Need in Charnwood was 1.280 dwellings per annum. The Local Plans Expert Group published its report to the Communities Secretary and to the Minister of Housing and Planning in March 2016. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework. Therefore, whilst the additional flexibility is supported our position is that the requirement should be reated as a minimum and a larger flexibility	does not change the need figure. The LHN via the Standard Methodology takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of: responding to the Government's agenda to boost housing supply, recognising the long-term unpredictable nature of the plan-making and site delivery, whilst balancing the desire to give certainty to our communities and the development industry; the Council has proposed an additional 1,300 homes to be delivered across the plan period. Having regard to the evidence base, and the detailed analysis in the SA, this additional housing provision is deemed to strike the right balance between facilitating growth, whilst protecting and enhancing the environment.

 achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from the carried forward SUE allocation sites set out in Draft Policy LP 3. Draft Policy LP 3 proposes the allocation of some 73 sites of varying sizes across the settlement hierarchy. In summary, there are uncertainties over delivery from a number of the small sites proposed allocation sites in multiple ownership and with access constraints. Around the Loughborough Urban Area a large number of urban sites are proposed for allocation including town centre opportunity sites where no progress has been made for a number of years and also sites in existing use as car parks and retail uses. Paragraph 4.9 of the Draft Plan refers to the issue of Leicester's unmet needs and argues that this is not an issue for Charnwood. Circumstances have now changed. Firstly, local authorities are now looking at future growth requirements based on the standard methodology. Secondly, Leicester City has recently set out its assessment of umet needs for the purposes of preparing its plan. A report to the Council's Overview Select Committee identifies a housing requirement for the period 2019-2036 of 29,104 dwellings with a shortfall of 7,813 dwellings to be found in adjoining authorities. Now that Leicester City has identified its unmet need for the plan period to 2036, the Leicester and L	 awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and

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	 Common Ground under the Duty to Cooperate to agree how the identified unmet need can be met. As well as taking a more realistic view on delivery, particularly from the West Loughborough SUE, the Council should apply at least a 20% flexibility buffer to the overall requirement. This would require additional allocations of some 3,600 homes to provide an appropriate level of flexibility to provide resilience in the plan. 	
EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold)	 The Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from the carried forward SUE allocation sites set out in Draft Policy LP 3. The Draft Plan assumes that over the plan period to 2036, the North East Leicester SUE would deliver 3,325 homes, West of Loughborough SUE 3,200 homes and North of Birstall 1,950 homes – a total of 8,475 homes over the plan period. For West Loughborough, the assumptions on delivery remain ambitious. Draft Policy LP 3 proposes the allocation of some 73 sites of varying sizes across the settlement hierarchy. In summary, there are uncertainties over delivery from a number of the small sites proposed allocations with potential heritage constraints, sites in existing employment use and sites in multiple ownership and with access constraints. 	 The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned.

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	•	Paragraph 4.9 of the Draft Plan refers to the issue of Leicester's unmet needs and argues that this is not an issue for Charnwood. Circumstances have now changed. Firstly, local authorities are now looking at future growth requirements based on the standard methodology. Secondly, Leicester City has recently set out its assessment of unmet needs for the purposes of preparing its plan. A report to the Council's Overview Select Committee identifies a housing requirement for the period 2019-2036 of 29,104 dwellings with a shortfall of 7,813 dwellings to be found in adjoining authorities. Now that Leicester City has identified its unmet need for the plan period to 2036, the Leicester and Leicestershire Housing Market Area authorities need to work to prepare a Statement of Common Ground under the Duty to Cooperate to agree how the identified unmet need can be met. As well as taking a more realistic view on delivery, particularly from the West Loughborough SUE, the Council should apply at least a 20% flexibility buffer to the overall requirement. This would require additional allocations of some 3,600 homes to provide an appropriate level of flexibility to provide resilience in the plan	the SHLAA (and also considered as part of the SA). Site-based constraints, such as: heritage, existing use, ownership, access, and environmental designations are taken into account when determining whether the site is suitable, available and achievable. This ultimately informs whether the sites are deemed deliverable and developable. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/207 Guy Longley Pegasus obo Davidsons Development Ltd (Sileby)	•	The Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. The Council needs to provide a greater level of flexibility in the plan to provide sufficient resilience to deal with changing circumstances and should include at least a 20% flexibility allowance.	 The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and

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	 The Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from the carried forward SUE allocations and uncertainties in delivery from the proposed allocation sites set out in Draft Policy LP 3. The Draft Plan assumes that over the plan period to 2036, the North East Leicester SUE would deliver 3,325 homes, West of Loughborough SUE 3,200 homes and North of Birstall 1,950 homes – a total of 8,475 homes over the plan period. For West Loughborough, the assumptions on delivery remain ambitious. Draft Policy LP 3 proposes the allocation of some 73 sites of varying sizes across the settlement hierarchy. In summary, there are uncertainties over delivery from a number of the small sites proposed for allocation. In the Leicester Urban Area there are proposed for allocation including town centre opportunity sites where no progress has been made for a number of years and also sites in existing use as car parks and retail uses. In addition to taking a more realistic view on delivery from the 	 locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment.
	SUEs, the Council should apply at least a 20% flexibility buffer	the SHLAA (and also considered as part of the SA). Site-based constraints, such as: heritage, existing use, ownership, access, and

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	to the overall requirement. This would require additional allocations of some 3,600 homes to provide an appropriate level of flexibility to provide resilience in the plan.	 environmental designations are taken into account when determining whether the site is suitable, available and achievable. This ultimately informs whether the sites are deemed deliverable and developable. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions
		(with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/209 Amy Smith Pegasus obo Jelsons	 The Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from the carried forward SUE allocation sites set out in Draft Policy LP 3. The Draft Plan assumes that over the plan period to 2036, the North East Leicester SUE would deliver 3,325 homes, West of Loughborough, the assumptions on delivery remain ambitious. A study by NLP, How Quickly do Large Scale Housing Sites Deliver, 2016, found that for sites of 2,000 homes or more, an annual delivery rate of around 150 homes per annum may be a more realistic assumption on build rates. Lubbesthorpe SUE in Blaby District, a peak delivery of 170 dwellings a year to date also suggests that the Council's assumptions are ambitious. 	 The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the

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	 Charnwood Housing Delivery Scenarios Report by BWB, December 2017. This assumes an annual rate of 160 dwellings a year for West Loughborough and 130 dwellings a year for North Birstall. These figures were based on developer input. On this basis it is considered a more realistic assessment would be the delivery of 2,300 homes at the North East Leicester SUE, 2,380 homes at West Loughborough and 1,950 homes at North Birstall – a reduced total of 6,630 homes. As a result of this more realistic assessment of delivery, a further 1,845 homes will need to be identified through further allocations. For the proposed draft allocations, we comment further in response to Question 8 below. Some headline comments in relation to the proposed allocations are outlined below: the proposed allocation of a number of small sites where delivery is uncertain; in the Leicester urban area, proposed allocations with potential heritage constraints, sites in existing employment use, sites in multiple ownership and with potential access constraints; in the Loughborough Urban Area – a large number of urban sites, including town centre opportunity sites where no progress has been made over a number of years, sites in existing use as car parks and in retail use. Paragraph 4.9 of the Draft Plan refers to the issue of Leicester's unmet needs and argues that this is not an issue for Charnwood. Circumstances have now changed. Firstly, local authorities are now looking at future growth requirements based on the standard methodology. Secondly, Leicester City has recently set out its assessment of unmet needs for the purposes of preparing its plan. A report to the Council's Overview Select Committee identifies a housing requirement for the period 2019-2036 of 29,104 dwellings with a shortfall of 7,813 dwellings to be found in adjoining authorities. Now that Leicester City has identified its unmet need for the plan period to 2036, the Leicester and Leicestershire Hous	Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. The sites put forward in the draft local plan have been appraised through the SHLAA (and also considered as part of the SA). Site-based constraints, such as: heritage, existing use, ownership, access, and environmental designations are taken into account when determining whether the site is suitable, available and achievable. This ultimately informs whether the sites are deemed deliverable and developable. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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	•	least a 20% flexibility buffer to the overall requirement. This would require a buffer of some 3,600 homes and provision for a further 1,800 homes to reflect a more realistic delivery from the SUEs.	
EDCLP/246 Andrew Collis Gladman Developments Ltd	•	Gladman welcome and is supportive in principle of the allocation of surplus housing land through the Local Plan in contrast to the proposed housing requirement. The Council propose an additional 1,300 dwellings over the plan period to provide added flexibility. Overall this means that there is a 7% surplus in supply over and above the proposed housing requirement. Whilst welcome, Gladman consider that the level of surplus land provided through the Local Plan is insufficient. To enhance the deliverability of the Local Plan, Gladman recommend that the surplus in supply should be increased to at least 15% of the proposed housing requirement (an additional 1,437 dwellings to that planned for through the Local Plan as drafted). The need for at least 15% surplus in supply is justified by the fact that the Council is reliant on 100% of the identified housing land supply coming forward as committed and allocated with no deductions made. A significant part of this is provided by three SUEs at north east of Leicester, Birstall and West of Loughborough, which collectively provide 8,475 dwellings over the plan period. All sites are re-allocated from the Core Strategy. At the time of writing there has been no net completions recorded at any of these sites. The development of new housing at all of these SUEs has slipped significantly since first allocated within the Core Strategy, with a total of 915 dwellings expected to have been delivered according to the adopted Housing Trajectory rising to 1,575 dwellings by the end of this monitoring year. The Local Plan, at its starting point, is therefore highly reliant on the timely and consistent delivery at these SUEs. If the expected trajectory for these sites is not achieved, the Local Plan is likely to fail. Increasing the surplus in supply provided through the Local Plan will help reduce this risk and maintain a plan-led approach.	 The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned.
EDCLP/254 Ian Deverell Turley on behalf	•	It is agreed that a Local Plan should have a level of contingency applied to the overall housing land supply and treated as a minimum rather than a maximum.	The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the

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of Rainier Developments Ltd)	 While it is appreciated that there is no set formula to determine an appropriate quantum of development to provide flexibility in the Plan, Rainier do not consider that an addition need for 1,300 homes provides sufficient flexibility in the plan given its high dependence upon relatively few large strategic sites rather than a more blended mix of residential sites of varying sizes. In additional, a more substantial contingency will maximise flexibility in order to respond quickly to changing circumstances, maintenance of a five year housing land supply and create choice and competition in the land market. A contingency of only 7% (1,300 dwellings) as proposed by the Council is not considered significant nor sufficient. 	 Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned.
EDCLP/255 Ian Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	 It is agreed that a Local Plan should have a level of contingency applied to the overall housing land supply and treated as a minimum rather than a maximum. While it is appreciated that there is no set formula to determine an appropriate quantum of development to provide flexibility in the Plan, Rainier do not consider that an addition need for 1,300 homes provides sufficient flexibility in the plan given its high dependence upon relatively few large strategic sites rather than a more blended mix of residential sites of varying sizes. In additional, a more substantial contingency will maximise flexibility in order to respond quickly to changing circumstances, 	The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: 1. overall scale of need across the borough;

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	maintenance of a five year housing land supply and create choice and competition in the land market. A contingency of only 7% (1,300 dwellings) as proposed by the Council is not considered significant nor sufficient.	 context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned.
EDCLP/258 Sam Heaton Heaton Planning on behalf of Swithland Homes Ltd	 The objective to plan for an additional 1,300 additional homes would not provide 'sufficient' flexibility to maintain a suitable five-year housing land supply as required Paragraph 73 of the NPPF. It is considered that the Council should apply at least a 10% buffer to the overall requirement calculated by the standard methodology. This is a particular risk due to the Borough's historic failure to meet completion targets. We would suggest that the Council needs to allocate further sites and reduce its reliance on the delivery of large SUEs, and we would recommend that Councils identify delivery for at least 10% more homes (i.e. 1839 dwelling) than the stated housing requirement. Whilst the Council states it has sufficient supply to meet its housing needs over the plan period, we do not consider there to be a sufficient buffer for such a statement to be made with any certainty. At present the Council is reliant on high level of windfall development to come forward in order to meet needs and has limited flexibility should delivery not come forward as expected. 	 The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development;

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EDCLP/202 Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	 As above, the Plan lacks sufficient flexibility for additional opportunity sides to come forward to meet local growth needs, which go beyond an additional 1,300 homes. The allocation of additional sites will provide more market choice and speed up take-up and delivery. 	 The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment.
	128	based upon the detailed analysis carried out by the promoters and the

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EDCLP/201 Boyer Planning obo Knightwood Trust Farms	 The Plan proposes approximately an additional 1,300 homes over the plan period, which will result in a total provision for 7,252 by 2036 which equates to approximately a 7% increase above the need identified by the standard methodology. An additional 1,300 is not sufficient to ensure that Charnwood Borough Council can maintain a five year housing land supply over the plan period and meet Leicester City's unmet housing need (see paragraph 2.5). It is considered that a high growth strategy can be delivered whilst protecting the environment. Other Local Planning Authorities, such as South Kesteven District Council have planned more positively in their emerging Local Plan by proposing a housing growth 13% above the objectively assessed need. It is therefore recommended that the Council significantly increases the number of dwellings provided above the minimum starting point identified by the standard methodology. Knightwood Trust Farms Limited have interest in Land at Six Hills which extends approximately 87 hectares. The decision to opt for a low growth strategy does not accord with the national policy to significantly boost the supply of homes across the country. In assessing their housing need, the Council have failed to fully take into account that the standard methodology for calculating housing need is a minimum starting point. Charnwood need to allocate significantly more development to address the unmet need of Leicester City, the delivery of affordable housing, changing government policies and an economic uplift to facilitate sustainable growth. The Council should foster a more positive approach to Plan making for the longer term by continuing to target development towards existing settlements. A new settlement will address the Council's housing need and will provide a number of social, economic and environmental objectives in line with national planning policies. In conclusion, it is recommended that the Council need to revaluate the	 Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site deliver; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs between the developers and the Council. The SoCGs between the developers and the Council. The SoCGs between the SUEs can be delivered as planned. Land at Six Hills has now been included as part of the SHLAA, and will be assessed as part of the overall possible supply in the borough.

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	 Land at Six Hills has been put forward as part of the Call for Sites Consultation and the submitted information has demonstrated that the site has an opportunity to deliver a sustainable new settlement, which will provide significant benefits to the Borough. The Draft Plan proposes to include a further 1,300 homes t achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites ar proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserves sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Cour includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from th carried forward SUE allocations and uncertainties in deliver from the proposed allocation sites set out in Draft Policy LF. The Part of the supporting evidence for the Draft Plan is the Charnwood Housing Delivery Scenarios Report by BWB, December 2017. This assumes an annual rate of 160 dwel a year for West Loughborough and 130 dwellings a year for North Birstall. These figures were based on developer input this basis it is considered a more realistic assessment wou the delivery of 2,300 homes at the North East Leicester SU 2,380 homes at West Loughborough and 1,950 homes at N Birstall – a reduced total of 6,630 homes. For the proposed allocation of a number of small sites wher delivery is uncertain; 	 (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment.
	 delivery is uncertain; 2. in the Leicester urban area, proposed allocations with potential heritage constraints, sites in existing employmuse, sites in multiple ownership and with potential acce 	developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that
	 constraints; 3. in the Loughborough Urban Area – a large number of u sites, including town centre opportunity sites where no 	rban The sites put forward in the draft local plan have been appraised through the SHLAA (and also considered as part of the SA). Site-based constraints, such as: heritage, existing use, ownership, access, and

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	 progress has been made over a number of years, sites in existing use as car parks and in retail use. Paragraph 4.9 of the Draft Plan refers to the issue of Leicester's unmet needs and argues that this is not an issue for Charnwood. Circumstances have now changed. Firstly, local authorities are now looking at future growth requirements based on the standard methodology. Secondly, Leicester City has recently set out its assessment of unmet needs for the purposes of preparing its plan. A report to the Council's Overview Select Committee identifies a housing requirement for the period 2019-2036 of 29,104 dwellings with a shortfall of 7,813 dwellings to be found in adjoining authorities. Now that Leicester City has identified its unmet need for the plan period to 2036, the Leicester and Leicestershire Housing Market Area authorities need to work to prepare a Statement of Common Ground under the Duty to Cooperate to agree how the identified unmet need can be met. As well as taking a more realistic view on delivery from the SUEs, the Council should apply at least a 15% flexibility buffer to the overall requirement. This would require additional allocations of some 1,800 homes to address potential shortfalls in delivery from the SUEs, and some additional 2,700 homes to provide an appropriate level of flexibility to provide resilience in the plan. 	environmental designations are taken into account when determining whether the site is suitable, available and achievable. This ultimately informs whether the sites are deemed deliverable and developable. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/239 Jonathon Barratt- Peacock	 1300 extra is far too many. The environment has been damaged so much that focus needs to be on protecting it. New towns could be built in locations such as just off the M6 in Scotland which has good road and rail links. Too much development is concentrated on Charnwood. Charnwood has already been allocated far more than its fair share of Leicester's housing needs. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The SA has appraised a series of growth options, and the 'hybrid' option, which closely matches the figures proposed in the draft local plan, represents the most sustainable development option minimising significant negative effects.
EDCLP/239 Vivienne Barratt- Peacock	 The growth is already very high and has been for many years. 1300 homes above what has been assessed is far too many. The relentless development is ruining Charnwood. 	The LHN represents the starting point for housing need in the borough. However, in seeking to balance the various aims of responding to the

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		Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The SA has appraised a series of growth options, and the 'hybrid' option, which closely matches the figures proposed in the draft local plan, represents the most sustainable development option minimising significant negative effects.
EDCLP/210 Boyer Planning obo Stagfield Group	 In addition to this, we consider that the additional 1,300 dwellings sought over the plan period is insufficient in order to truly provide flexibility, and does not sufficiently protect the housing land supply from even a medium growth scenario. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is
		 derived from an analysis of a range of factors. These include: 1. overall scale of need across the borough; 2. context provided by the wider Housing Market Area; 3. extant policy approach and proposals for delivering three SUEs; 4. awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and 5. analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development;
		Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment.
	122	Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that

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 EDCLP/195 Greg Hutton Davidsons Developments Ltd The Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represens sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from the proposed allocation sites set out in Draft Policy LP 3. The Draft Plan assumes that over the plan period to 2036, the North East Leicester SUE would deliver 3,325 homes, West of Loughborough SUE 3,200 homes and North of Birstall 1,950 homes – a total of 8,475 homes over the plan period. For Wes Loughborough, the assumptions on delivery remain ambitious For the proposed draft allocations, we comment further in response to Question 8 below. Some headline comments in relation to the proposed allocations are outlined below: 	 However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential immediate and the sum of sites across for another potential immediate and the sum of sites across for another potential and built out; and

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 the proposed allocation of a number of small sites where delivery is uncertain; in the Leicester urban area, proposed allocations with potential heritage constraints, sites in existing employment use, sites in multiple ownership and with potential access constraints; in the Loughborough Urban Area – a large number of urban sites, including town centre opportunity sites where no progress has been made over a number of years, sites in existing use as car parks and in retail use. Paragraph 4.9 of the Draft Plan refers to the issue of Leicester's unmet needs and argues that this is not an issue for Charnwood. Circumstances have now changed. Firstly, local authorities are now looking at future growth requirements based on the standard methodology. Secondly, Leicester City has recently set out its assessment of unmet needs for the purposes of preparing its plan. A report to the Council's Overview Select Committee identifies a housing requirement for the period 2019-2036 of 29,104 dwellings with a shortfall of 7,813 dwellings to be found in adjoining authorities. Now that Leicester City has identified its unmet need for the plan period to 2036, the Leicester and Leicestershire Housing Market Area authorities need to work to prepare a Statement of Common Ground under the Duty to Cooperate to agree how the identified unmet need can be met. As well as taking a more realistic view on delivery, particularly from the West of Loughborough SUE, the Council should apply at least a 20% flexibility buffer to the overall requirement. This would require additional allocations of some 3,600 homes to provide an appropriate level of flexibility to provide resilience in the plan. 	between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. The sites put forward in the draft local plan have been appraised through the SHLAA (and also considered as part of the SA). Site-based constraints, such as: heritage, existing use, ownership, access, and environmental designations are taken into account when determining whether the site is suitable, available and achievable. This ultimately informs whether the sites are deemed deliverable and developable. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/193 Richard Webb	• I think this represents a figure that would be too high if spread across the region arbitrarily. Another potential way of providing this buffer would be to have a new settlement or SUE that is ready to push the button on. This would ensure that facilities and services are in place rather than pushing and stressing some of the villages that are struggling.	The preferred strategy is one of urban concentration and intensification, utilising 3 SUEs, and a number of identified development sites to achieve a pattern of development that minimises impacts, whilst maximising the benefits of growth and development. The preferred distribution of new homes focusses on the main Leicester urban area, the Lougborough urban area, and the Shepshed urban area, along with the larger service centres at Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley, and Sileby.
EDCLP/204 Guy Longley Pegasus	The Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This is only a 7% allowance above the	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy.

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obo Davidsons Development Ltd (Rothley)	 housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from the carried forward SUE allocations and uncertainties in delivery from the proposed allocation sites set out in Draft Policy LP 3. The Draft Plan assumes that over the plan period to 2036, the North East Leicester SUE would deliver 3,325 homes, West of Loughborough, the assumptions on delivery remain ambitious. For the proposed draft allocations, we comment further in response to Question 8 below. Some headline comments in relation to the proposed allocation sites are outlined below: the proposed allocation of a number of small sites where delivery is uncertain; in the Loughborough Urban Area – a large number of urban sites, including town centre opportunity sites where no progress has been made over a number of years, sites in existing use as car parks and in retail use. Paragraph 4.9 of the Draft Plan refers to the issue of Leicester's unmet needs and argues that this is not an issue for Charmwood. Circumstances and needs or years, sites in existing use as car parks and in retail use. Paragraph 4.9 of the Draft Plan refers to the council's overview Select Committe olexifies a housing requirement based on the standard methodology. Secondly, Leicester City has recently set out its assessment of unmet needs for the purposes of 20.014 dwellings with a shortfall of the preading at future growth requirem	 However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment. Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. The sites put forward in the draft local plan have been appraised through the SHLAA (and also considered as part of the SA). Site-based constraints, such as: heritage, existing use, ownership, access, and environmental designations are taken into account when determining whether the site is suitable, available and achievable. Th

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	 7,813 dwellings to be found in adjoining authorities. Now that Leicester City has identified its unmet need for the plan period to 2036, the Leicester and Leicestershire Housing Market Area authorities need to work to prepare a Statement of Common Ground under the Duty to Cooperate to agree how the identified unmet need can be met. As well as taking a more realistic view on delivery, particularly from the West of Loughborough SUE, the Council should apply at least a 20% flexibility buffer to the overall requirement. This would require additional allocations of some 3,600 homes to provide an appropriate level of flexibility to provide resilience in the plan. 	(with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
DCLP/261 Edward Argar MP	 [if population projections change downwards] that in planning for the additional 1,300 homes, the additional numbers should only kick-in if needed, and that a number of areas for these should be designated as 'reserve' areas with development in those areas not considered unless and until a shortfall elsewhere in the borough were proven. 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period.
EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	 The Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. A further issue justifying additional flexibility is the Council's continued overly ambitious assumptions on delivery from the carried forward SUE allocation sites set out in Draft Policy LP 3. The Draft Plan assumes that over the plan period to 2036, the North East Leicester SUE would deliver 3,325 homes, West of Loughborough SUE 3,200 homes and North of Birstall 1,950 homes – a total of 8,475 homes over the plan period. For West 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and

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	•	Loughborough, the assumptions on delivery remain ambitious. A study by NLP, How Quickly do Large Scale Housing Sites Deliver, 2016, found that for sites of 2,000 homes or more, an	impacts from decisions on the overall quantum of growth, and the locations for future development;
	•	annual delivery rate of around 150 homes per annum may be a more realistic assumption on build rates. Lubbesthorpe SUE in Blaby District, a peak delivery of 170 dwellings a year to date also suggests that the Council's	Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment.
	•	assumptions are ambitious. The Part of the supporting evidence for the Draft Plan is the Charnwood Housing Delivery Scenarios Report by BWB, December 2017. This assumes an annual rate of 160 dwellings a year for West Loughborough and 130 dwellings a year for North Birstall. These figures were based on developer input. On this basis it is considered a more realistic assessment would be	Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned.
	•	the delivery of 2,300 homes at the North East Leicester SUE, 2,380 homes at West Loughborough and 1,950 homes at North Birstall – a reduced total of 6,630 homes. As a result of this more realistic assessment of delivery, a	The sites put forward in the draft local plan have been appraised through the SHLAA (and also considered as part of the SA). Site-based constraints, such as: heritage, existing use, ownership, access, and environmental designations are taken into account when determining
		further 1,845 homes will need to be identified through further allocations.	whether the site is suitable, available and achievable. This ultimately informs whether the sites are deemed deliverable and developable.
	•	Paragraph 4.9 of the Draft Plan refers to the issue of Leicester's unmet needs and argues that this is not an issue for Charnwood. Circumstances have now changed. Firstly, local authorities are now looking at future growth requirements based on the standard methodology. Secondly, Leicester City has recently set out its assessment of unmet needs for the purposes of preparing its plan. A report to the Council's Overview Select Committee identifies a housing requirement for the period 2019-2036 of 29,104 dwellings with a shortfall of 7,813 dwellings to be found in adjoining authorities.	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
	•	As well as taking a more realistic view on delivery from the SUEs, the Council should apply at least a 20% flexibility buffer to the overall requirement. This would require additional allocations of some 1,800 homes to address potential shortfalls in delivery from the SUEs and some additional 3,600 homes to provide an appropriate level of flexibility to provide resilience in the plan.	
EDCLP/177 Sue Green House Builders Federation	•	The Council's proposed low growth scenario based on LHN assessment is only a minimum starting point. The Council latest evidence of affordable housing need is 384 dwellings per annum which is a significant increase on the need	The LHN via the Standard Methodology takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure.

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	 previously identified in the adopted Core Strategy. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. An increase in the total housing figures may be considered where it could help deliver affordable housing. It is understood that Leicester City Council will be consulting on its Draft Local Plan in January / February 2020. This consultation will identify a shortfall of 7,813 dwellings to 2036 to be re-distributed through agreements with adjacent District Councils. The HBF note that the L&LSGP is a non-statutory document, which has not been subject to scrutiny at an examination. The HBF also understand that the non-statutory L&LSGP states that "the agreed distribution for the period 2011 – 2036 will be set out in a Memorandum of Understanding (MoU) which will be used as the basis for preparing or reviewing Local Plans with 2036 as an end date". This MoU has not yet been produced. To fully meet the legal requirements of the Duty to Co-operate the Council should engage on a constructive, active and ongoing basis with other L&LHMA authorities to maximise the effectiveness of plan making. The Charnwood Local Plan should be prepared through joint working on cross boundary issues. As set out in the 2019 NPPF (paras 24, 26 & 27) the Council should provide a signed Statement of Common Ground (SoCG) between itself and other L&LHMA authorities. The NPPG sets out that authorities should have a SoCG available on their website by the time of publication of the Draft Plan. It is vital that the Council agree a SoCG with other L&LHMAs authorities, which sets out an agreed position on housing needs and the meeting of any unmet needs arising from the city of Leicester up to 2036. A SoCG should be provided by the Council Plan. It is agreed that a flexible contingency should be applied to the overall HLS so that the housing requirement is treated as a	In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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EDCLP/194 Guy Longley Pegasus on behalf of Hallam Land Management	 and / or specific settlements / localities rather than if HLS is more diversified. A contingency of only 7% (1,300 dwellings) as proposed by the Council is not considered significant nor sufficient. The Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This is only a 7% allowance above the housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. The Council needs to provide a greater level of flexibility in the plan to provide sufficient resilience to deal with changing circumstances and should include at least a 20% flexibility allowance. 	 The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. However, in seeking to balance the various aims of responding to the Government's agenda to boost housing supply; recognising the long-term nature of plan-making and site delivery; whilst also balancing the desire to give certainty to our communities and the development industry – the Council has proposed an additional 1,322 homes to be delivered across the plan period. The current figure for the proposed additional number of homes is derived from an analysis of a range of factors. These include: overall scale of need across the borough; context provided by the wider Housing Market Area; extant policy approach and proposals for delivering three SUEs; awareness of the nature of the housing market in Charnwood, and the location and quantum of sites across the borough. This includes a detailed understanding of the way that individual sites are assembled and built out; and analysis of a range of growth options, to understand the potential impacts from decisions on the overall quantum of growth, and the locations for future development; Taking all this analysis together currently demonstrates that an additional 1,322 new homes across the plan period would strike the right balance between meeting the needs of the borough, facilitating growth, whilst protecting and enhancing the environment.
EDCLP/199 Rob Foers Hinckley and Bosworth Borough Council	 The Borough Council welcomes the approach to calculate local housing need based on the standard methodology. Leicester City have declared an unmet housing need in the period up to 2036. The City Council have only recently been able to quantify this level of unmet need – albeit in draft - and it is expected they will consult on a draft plan in early 2020. Hinckley and Bosworth Borough Council, Charnwood Borough Council and the other Local Planning Authorities within the HMA are currently preparing a Statement of Common Ground 	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is addressed. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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	 (SoCG) which will set out how unmet need will be accommodated in the HMA up to 2031 and beyond to at least 2041. The Charnwood Local Plan will need to reflect the final approved SoCG with regard to the redistribution of unmet need. The City Council has declared an unmet housing need which, for our plans to be found sound, must be accommodated within the rest of the HMA. The scale of the unmet need was reported to the City Council's Overview Select Committee on 28th November It follows that HMA partners must now work together, having regard to Appendix A of the SGP, to establish a sustainable distribution of that need across the county. As the Charnwood Local Plan progresses towards submission stage it will need to either: (i) make provision for Charnwood's apportionment of the City's unmet need as may in the meantime be agreed between all HMA partners; or otherwise (ii) build in sufficient flexibility to 	OFFICER RESPONSE The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is addressed. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
	 accommodate during the life of the plan such portion (if any) of Leicester's unmet need as may be subsequently attributed to Charnwood. The City Council considers that the Charnwood Local Plan should plan for a higher housing target. The City Council considers that provision must be made for Leicester's unmet need within the HMA. The City Council welcomes the decision to include headroom of 	
	 1,322 dwellings above Charnwood's minimum requirement of 5,930 dwellings over the plan period and recommends that this additional supply be explicitly referenced as a potential contribution to the City Council's unmet need should this prove necessary. The City Council notes that Appendix A and Appendix B f the SGP should be more accurately reflected in paragraph 4.5 of 	
EDCLP/274 Avisons obo	 the draft local plan. However, Charnwood should recognise that through DTC and SCG any changed circumstances in respect of HMA housing demand and distribution may require Charnwood to assist in meeting City unmet need and appropriate flexibility needs to be built into the plan to allow for this. There are a number of studies that have been published to assess the delivery of large-scale housing sites (Sustainable 	The SUEs are an important part of the development strategy. All of the SUEs now benefit from planning permission, and there is strong
Jelsons	Urban Extensions, Strategic Development Areas etc).	confidence that the sites will deliver the proposed scale of housing.

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• •	Savills published a report assessing the delivery rates of urban extensions in October 2014. It concludes that, on average, an SUE starts construction on the first phase of housing more than four years after the submission of an outline planning application. In terms of delivery rates, analysis suggests an anticipated delivery of 60 units in the first year, 100 units per annum in subsequent years and then at a consistent level of around 120 units. our Client does not agree that the proposed level of flexibility /resilience is appropriate given the Authority's continued over reliance and overly optimistic assumptions about the delivery from the SUEs allocations that have been carried over from the adopted Core Strategy. Nathaniel Lichfield and Partners (Lichfields) published its findings on how quickly large-scale housing sites deliver in November 2016. The report concludes that the average lead in time for large sites (over 500 units) prior to the submission of the first planning application was 3.9 years, while it took on average 5 years for planning approval to be secured. With respect to sites of up to 1,499 units (arguably both Lutterworth and Scraptoft SDAs fall into this category), the report concluded that average delivery rates barely exceed 100 units per annum. There were no examples within this category which reached a rate of 200 homes per annum. The Government produced an independent review of build out rates (draft analysis) in June 2018. This was prepared by Sir Oliver Letwin MP. He found that the median build-out time period for these sites was 15 years, with a median of 6.5% of the site built out each year. All of the above studies are noteworthy. However, they are not without their shortcomings. Principally, the averages are taken from sites around the country where different economic circumstances can influence results. For instance, SUEs in the south-east are more likely to have greater build out rates due to the local market than a site in the north-east, for example. With the above in mind,	Proposals for the SUEs are supported by SoCGs between the developers and the Council. The SoCGs establish housing trajectories, based upon the detailed analysis carried out by the promoters and the Council. This information provides the Council with the confidence that the SUEs can be delivered as planned. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is addressed. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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	 500+ unit schemes). The results of this study are perhaps more pertinent to the proposed SUEs in Charnwood. The Avison Young study examined a total of 17 developments. The data indicates that it takes on average: 5.6 years to get from first contemplation to the submission of an application for planning permission; 21 months, from validation of an application for planning permission to secure a resolution to grant permission; 23 months to negotiate and complete a S106 Agreement; 31 months to get from the submission of the first Reserved Matters or from the submission of the first application to discharge conditions, to having in place all the planning approvals the developer needs to make a start on site (this does not include 'technical approvals' required from, say, the highways and drainage authorities); and (based on actual 'opening up' data, or predictions given by developers) 19 months to get from making a start on site to constructing the first dwelling. In the light of the above, our Client is of the view that the degree of flexibility / resilience built in to the Authority's preferred development strategy is woefully inadequate and the Council should therefore apply a 20% buffer to the overall requirement to allow for more realistic delivery from the SUEs and from those proposed allocations in the emerging Plan where their deliverability is uncertain. the Council has in our view failed to properly grapple with the issue of the unmet need of adjoining authorities. Paragraph 4.9 of the Preferred Options paper indicates that Leicester (or other authorities who aren't able to accommodate their share of Leicester's unmet need bot this approach for a number of reasons. First, the Strategic Growth Plan is a non-statutory plan which looked at how the Leicestershire authorities could accommodate the City's unmet needs from 2031 to 2050, using growth forecast from the HEDNA. Second, many of the 	

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	 local plans to take account of what the standard methodology means for their adopted growth strategies. Third, Leicester City's housing requirement and any subsequent levels of unmet need have yet to be properly tested. Taking all of the above into account, our Client is of the view that the Leicestershire authorities should commence preparation of a Statement of Common Ground, under the Duty to Cooperate, which will confirm how the City's identified unmet need can be met. The Borough Council should then assess what implications, if any, this would have for its own housing needs and its strategy for meeting this. 	
EDCLP/276 Pegasus obo Wilson Enterprises	 In addition to the proposed housing to be provided through a low growth strategy, the Draft Plan proposes to include a further 1,300 homes to achieve flexibility. This additional proposed supply is only a 7% allowance above the housing requirement of 18,374 homes. This does not represent sufficient flexibility to allow for changing circumstances including the potential under-delivery on committed sites and proposed allocations. The Local Plans Expert Group report, 2016, set out recommendations for a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. This demonstrates that the Draft Plan's inclusion of a 7% flexibility allowance is not sufficient. In its recently adopted Local Plan, Harborough District Council includes a 15% contingency over and above their minimum housing requirement. The Local Plan Inspector commented that the headroom was required to ensure resilience in the plan, and it was not to be regarded as Harborough District Council's contribution towards meeting Leicester's unmet needs. The Council needs to provide a greater level of flexibility in the plan to provide sufficient resilience to deal with changing circumstances and should include at least a 20% flexibility allowance. 	The Local Housing Need is derived from the Standard Methodology, this represents the starting point for the growth strategy. The LHN, via the Standard Methodology, takes specific account of the affordability of housing, and demonstrable signals from the housing market. As such, levels of affordability are factored in to the 1,082 dwellings per annum figure. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The SA has considered a series of potential growth options. It is important to note as well as the 'low' and 'high' growth scenarios, the SA also analysed a 'hybrid' growth scenario. The SA has, therefore, assessed growth figures of 7,800 (hybrid), 8,100 (low), and 15,700 (high). Given the draft local plan is proposing a 'to be found' figure of 7,252, it is suggested that this is very similar to the hybrid option appraised – and that the SA of this growth options provides a comparable appraisal of the impacts that would be generated by the scale of growth proposed in the draft local plan. As the draft local plan is refined, the SA will also be updated to reflect any changes in policy approach. Where necessary, this will include further analysis of growth options.
	e with our preferred development strategy and the way it allocates ution would you suggest and why?	development to different parts of the Borough? If not, what
DCLP/23 and DCLP/26	 You need to take into account The Sileby Neighbourhood plan 	Understanding the impact of development on infrastructure is a priority issue for the Council.

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Ms Suzanne Collington	 and recent Planning inspectors decisions on Barnards Drive Sileby, East Goscote and Rearsby. You need to have a growth scheme that puts the building of new houses into larger new developments so that the appropriate healthcare, education and transport infrastructure is provided to service the new development. It is unsustainable and dangerous to keep building under 200 odd houses here and there so they fall under the requirements to provide infrastructure. 	 The Council has prepared an Infrastructure Delivery Plan, which analyses the current capacity of infrastructure and assesses the impact of the proposed growth as set out in the draft local plan. This information has helped inform the development strategy and distribution strategy; and has informed the policy framework set out in Chapter 7, 8, and 9 of the draft local plan. The draft local plan provides for a balanced portfolio of sites to be developed over the plan period. This is to cater to the different market conditions across the borough, and to allow for different landowners and developers to progress a variety of schemes that meet local housing
DCLP/86 Mr Dennis Marchant	 Disagree as the Small Villages and Hamlets have avoided new home development and under the proposed strategy will continue to do so this results in withering communities that fail to provide accommodation for the younger generations village of the community. Consequently the communities become stagnant with less facilities and services. The service centres have taken a substantial amount of recent development and their distribution could be reduced if the share was distributed across the Small Villages and Hamlets. 	 needs. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects. The SA considered a "Dispersed Settlement Hierarchy Distribution", at both a low growth option (8,100 additional dwellings), and a high growth option (15,700 additional dwellings). The outcome from the analysis of the Dispersed Settlement Hierarchy Distribution options was, that under the low growth option there were negative impacts in terms of economy and employment, healthy lifestyle, deprivation, accessibility and climate change. And, under the high growth option there were significant negative effects in relation to health and recreation, due to the potential negative effects on the Charnwood Forest. The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the
		role and function of the settlements within the borough, and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
DCLP/128	Cossington is classified as an "Other Settlement" eg it has 144	The evidence base for the draft local plan includes the Charnwood

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Mr Stuart Love	some of the facilities / services to meet the day to day needs of residents. However, the village only has a primary school and pub and limited bus service. Despite this it is being categorised here as being equivalent to much larger villages like Woodhouse Eaves and Queniborough which have a much larger number of facilities including a range of shops. I would argue Cossington should be classified as a Small Village / Hamlet as it only has limited services and facilities.	Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough, and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
DCLP/132 Mr Martin Peters	 As the allocation does not cover visitor facilities, it's not possible to comment. It would be good to see reference for the need for a 'demand study' the be commissioned to provide the evidence base needed to show what additional facilities will be required and where they should be located. This would add real weight to this section and ensure that the visitor economy is properly referenced throughout and not just included in the vision. 	Access to visitor facilities and the role of the visitor economy are key indicators in the Charnwood Settlement Hierarchy Assessment (March 2018). Demand on services, assets, and infrastructure has been considered as part of the IDP. Furthermore, the future for the visitor economy is a key component of the Charnwood Economic Development Strategy (2018 – 2020).
DCLP/143 County Councillor Max Hunt	 The preferred 'hybrid' distribution is pragmatic with more than a hint of political expedience. I agree that the City of Leicester, as the county's economic hub, must be full supported with its housing needs. The identification of the greatest number of additional houses to Shepshed (2,041) is completely unsustainable. recognising its size in relation to other settlements, is a complete outlier. The town has already grown substantially but has not received the extra infrastructure it requires. The road network in this small town cannot bear much more traffic. The Draft Plan admits that the retail offer in the town leads residents to shop elsewhere and there is significant pressure on medical and other services. In addition it is noted that this is now the only small town or village in the borough without an area of separation. 	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough, and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood. In terms of categorising Shepshed, the Settlement Hierarchy notes that it provides all the essential and desirable services and facilities including very good or excellent accessibility to employment and higher order services. Strong physical or functional connection to an urban area. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a distribution of 2,000 additional dwellings at Shepshed) is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects.
DCLP/185 Quorndon Parish Council	• The QPC suggests that to prevent community stagnation and provide housing for local people a greater proportion of the share of Service Centre housing be distributed across	Noted – the draft local plan has been formulated based on the evidence base. This indicates distributing new growth towards locations and settlements that have greater access to employment, services, facilities, and infrastructure will generate a more sustainable pattern of

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DCLP/192 Miss Shirley Dixon	 the Small Villages and Hamlets. I do not agree that Rothley should be considered a service centre, it can't "service" the residents currently due to all the new builds 	development. Noted – the draft local plan has been formulated based on the evidence base. This indicates distributing new growth towards locations and settlements that have greater access to employment, services, facilities, and infrastructure will generate a more sustainable pattern of development.
DCLP/226 Mr Gideon Cumming	 The Council should consider carefully the expansion of housing within Loughborough town centre in terms of increased traffic, and in terms of the effect on existing residents. 	 Noted - preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. Alongside the Leicester Urban Area, Loughborough is the focus for planned growth. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the
		 preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
DCLP/273 East Leicestershire & Rutland Clinical Commissioning Group	 I think it is important to consider location of existing GP surgeries in the area to ensure patients have easy access and associated car parking 	The Charnwood Settlement Hierarchy Assessment (March 2018), and the Infrastructure Delivery Plan consider the location of existing facilities and the impact of proposed new development on these facilities.
DCLP/282 Harborough District Council	 Welcome the approach to the location of development which takes into account the priorities set out in the Strategic Growth Plan. Progress and agreement around the Statement of Common Ground will be important in finalising the scale and location of development in the pre-submission Local Plan. Re: Employment (para 4.17). Welcome reference to the strategic distribution evidence in preparation and the commitment to consider its findings in preparing the Pre-Submission Draft Plan. (Officer comments) 	Noted – As the draft local plan progresses through the plan-making process, the Council expects to draft and agree Statements of Common Ground with the relevant strategic policy-making authorities.
DCLP/294 Mr David Higgs	 In the Shepshed area there are already a large number of houses under construction or about to be constructed (830). There has, to date, been no increase in the infrastructure in the 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and

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	•	town to accommodate the new occupants. Nor is there any land set aside for new infrastructure. When the current housing is completed the town will be overwhelmed and even more gridlocked than it is currently. Constructing an additional 2019 houses is quite simply not sustainable. No land has been identified in the area for industry, which can only mean the majority of the new occupants will be commuting out of the area increasing the already great burden on the roads and negating any 'improvement' gained from the current A512 road works.	 spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a distribution of 2,000 additional dwellings at Shepshed) is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of degreed and the greatest and analysis of degreed.
DCLP/308 Dr Satbir Jassal	•	Section 4.27 the sustainability appraisal process conducted in April 2018 we feel is flawed. The organisation who conducted this commented that they had asked people involved with the modifications that they suggested. As residents of Woodthorpe Hamlet we have not been consulted about our views on the reduction of the area of separation from our village down to the railway line. This this would impact greatly to the integrity and historical character of our Hamlet which goes directly against the planned vision for the future.	 demand, cost, timescale, and delivery. Noted – The SA is an objective process and is a method to appraise the potential impacts of proposed new development, and to ensure that proposals represent sustainable development. Further SA work will be undertaken prior to the Regulation 19 stage of consultation on the local plan. At this point, the SA work will formally constitute an SA Report. This response will be an input into that future work, and consultees will have a further opportunity to comment on the content and the process.
DCLP/326 Mrs Alison Lawton-Devine	•	The move to increase more public transport use is fine if you're a single person travelling to work in the urban centre. We are a family on 5, we work outside of Loughborough, returning to the centre to collect the children from child care on an evening and visiting the town centre on a weekend is impractical and expensive on public transport. Where we live, here is no direct bus route to the train station or Leicester and requires a 15 mins bus ride into the centre to catch a second bus or a walk to the train station. As a result we don't use the facilities.	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
DCLP/330 Mr P Edgley	•	I disagree with the preferred distribution policy as even the term 'smaller development' is a relative one and can still overload and adversely affect the character of 'other settlements' where it	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the

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	 is not applied in a responsible manner. For example, these proposed 'smaller developments' would increase the size of Cossington by 50% yet it is claimed in the Sustainability Assessment Report that the 'sensitive context' and linear feel of the village can be preserved whilst, in contradiction, it recognises that this outcome is uncertain. Ref 7.9.45. I would suggest that the better solution is to concentrate, where possible, on approving sites which produce the largest developer contributions. This would enable greater scope for landscaping and appropriate areas of separation. Also, it is more likely to produce the necessary funding for new facilities such as schools, doctors, shops etc to be built on the doorstep or existing ones to be improved in the locality This aligns to the councils green agenda to reduce carbon footprint, increase health by promoting walking etc. 	'Hybrid' option is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects. The draft local plan notes that a combination of large-scale sites and small-scale sites are needed across the borough to provide a balanced portfolio of sites, and to cater to a range of different landowners and developers; whilst also meeting local community needs.
DCLP/348 Mr John Barton	 Broadly, yes I agree. This does not tell us the type of housing to be built in each location. Can young people afford to live in the new housing in the villages? Is there enough accommodation for old people in the villages? And for their live-in carers or home visiting carers to live nearby? 	The next draft of the local plan will provide greater levels of detail on specific sites. Draft Policy LP 4 and Draft Policy LP 6 provide the policy framework to achieve an appropriate housing mix across the borough, that can meet the needs of older persons.
DCLP/389 Dr Martin Field	 I agree that the main trust of new developments should be targeted towards the existing larger urban and 'service centres'. I do not agree with the current mechanism for the numbers of properties to be permitted in the 'other settlements' and the 'hamlets' as this can resulted in very uneven developments in some locations it would be more useful and supportable for a maximum number of additional dwellings to be set for any new development in 'other settlements' or 'hamlets', in terms the maximum percentage growth of each settlement or hamlet in relation to their existing size (such as 'additional properties should be no more than 5% growth in parish households in the Plan period'). 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects. Draft Policy LP 1 sets out mechanisms to that growth is commensurate with the development strategy. Draft Policy LP1 notes that: "(d)evelopment proposals which do not accord with the pattern of development in the spatial strategy will not be considered compatible with the vision and will not meet the objectives of the plan and as a result will not be supported."
LDCLP/02 Anonymous	 The increase to Shepshed will need careful management with regard road use, development of schools/doctors etc Develop services and roads first before putting Shepshed in a constant gridlock. Where will all these people be buried as Shepshed's graveyard is nearly full! 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a distribution of 2,000 additional dwellings at Shepshed) is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects.

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LDCLP/15 Anonymous	 Yes - Not sure how the council can influence bus services though 	A new burial space has been identified in the south-west of Loughborough / Nanpantan. Draft Policy LP 28 defines 9.1 hectares for burial space. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report
		(2019) explored the implications of the growth scenarios, and the preferred development strategy.
		Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
		The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
LDCLP/22 Anonymous	 No, I feel some areas of the Borough have been hit very heavily with new build houses particularly Syston some areas have had none or little. This is also true of some areas of the country. We have very little green fields left our quality of life is not being considered at all. 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a distribution of 2,000 additional dwellings at Shepshed) is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects.
LDCLP/34 Anonymous	 There is little mention of rising water levels which must be planned for. 	Flood risk and understand the impact of new development on the risk of flooding is a Corporate priority. This is reflected in the analysis set out in the SHELAA and SA. Furthermore, the IDP considers the impact of development on flood management and protection infrastructure. The Council is working directly with the statutory providers to understand the impacts of development, and agree any necessary mitigation measures.
LDCLP/51 Anonymous	 Improve what we already have and utilise it better. 	Noted – as well as maximising existing assets, there is a requirement to meet future needs.
EDCLP/07 and EDCLP/10 Mr & Mrs G Allen	• We would also like you to consider a doctors surgery as Rothley has grown and grown over the last few years. Rothley does not want any more estates, we do not have the infrastructure to cope.	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on primary and secondary healthcare is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development, and agree any necessary mitigation measures.
EDCLP/08 Ratcliffe on the Wreake Parish Council	 Ratcliffe on the Wreake Parish Council have reviewed the documentation and would like to submit the following comments: The only reference to Ratcliffe is on pages 256 to 264, 	Noted – The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that

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	 where a developer is offering to build 10 houses on Main Street. We would insist that Charnwood Borough Council keep to the current strategy to protect the integrity of the small village. In the current plan Charnwood Borough Council have isolated Ratcliffe and 4 or 5 other small villages that they found not suitable for any expansion due to their limited facilities with the exception of 1 or 2 houses to meet local needs. 	the 'Hybrid' option is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/14 Lyn Armitage	 A) Preferred Options Chapter 4 - Development Strategy - Table 3: Charnwood Proposed Settlement Hierarchy Cossington has been incorrectly assessed as - " Other Settlement "A settlement that has some of the services and facilities to meet the day to day needs of resident" This is totally inappropriate, as Cossington is matched and categorised as being comparable with much larger settlements which have access to services and facilities that Cossington does not possess i. The appropriate category is "Small Village or Hamlet A settlement that has limited services and facilities to meet 	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough, and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
EDCLP/26 East Midlands Airport	Paragraph 4.5 identifies the link to the Leicester and Leicestershire Strategic Growth Plan. The Strategic Growth Plan identifies a number of key growth areas. One of these is the Leicestershire International Gateway. Spatially the International Gateway falls within North West Leicestershire and parts of Charnwood. The area is focused on the northern part of the County around the M1 and the A42 and includes key economic and employment drivers that include the Airport, the East Midlands Gateway Strategic Rail Freight and links to the East Midlands Hub HS2 station at Toton. This growth area is an important opportunity for Charnwood, it includes Shepshed and has good links to Loughborough. It could therefore helpfully be given greater recognition in the Local Plan document within Chapter 4.	Noted – the opportunity for the International Gateway is noted in the reasoned justification for Draft Policy LP 1. The Council continues to support the objectives of the SGP and is working with the other local authorities to establish how the aims can be delivered.
EDCLP/31 Barkby & Barkby Thorpe Parish Council	The Local Plan has a lot to say over green issues. It recognises climate change and has multiple environment policies but its bottom line is dependence on the private car rather than on public transport. Witness its unquestioned support for the Leicester and Leicestershire SGP (Chapter 4 Development Strategy para 4.5 page 16 and Chapter 9 Infrastructure Delivery para 9.7 page 110) the central plank of which is the A46 Expressway which would	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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EDCLP/32 BABTAG	 carve a swathe through the borough's finest countryside. The Expressway's possible route and its impact on local communities are missing from this Local Plan and planners at the Syston public exhibition admitted that the new Local Plan, whilst openly supportive of the SGP had not taken account its transport implications. The Local Plan has a lot to say over green issues. It recognises climate change and has multiple environment policies but its bottom line is dependence on the private car rather than on public transport. Witness its unquestioned support for the Leicester and Leicestershire SGP (Chapter 4 Development Strategy para 4.5 page 16 and Chapter 9 Infrastructure Delivery para 9.7 page 110) the central plank of which is the A46 Expressway which would carve a swathe through the borough's finest countryside. The Expressway's possible route and its impact on local communities are missing from this Local Plan and planners at the Syston public exhibition admitted that the new Local Plan, whilst openly 	The Council continues to support the objectives of the SGP and is working with the other local authorities to establish how the aims can be delivered. The planning, costing, and delivery of sub-regional scale infrastructure (such as the A46 Expressway) will be determined via the SGP partnership and organisations such as Midland Connect. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council continues to support the objectives of the SGP and is working with the other local authorities to establish how the aims can be delivered. The planning, costing, and delivery of sub-regional scale
	supportive of the SGP had not taken account its transport implications.	infrastructure (such as the A46 Expressway) will be determined via the SGP partnership and organisations such as Leicestershire County Council.
EDCLP/34 Cllr Mary Draycott	See answer to Q3b. Instead of adding to already stretched settlements more thought should have gone in to looking at a new large settlement/SUE to the East of Loughborough. Hardly any development is being	The possibility of a new settlement was considered within the SA as part of four different 'high-level' housing growth scenarios / distribution options; and two 'refined' options.
	proposed to the East of the Borough. The Cotes area is ideal as it adjoins Loughborough so 'no infrastructure' not an issue indeed it is very close to the railway station and main roads as examples. Also Developers have shown interest already.	The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Housing is needed but not the bog standard designs going up which where ever you go all look the same. It is social housing that is needed and good quality does not mean expensive.	The preferred development strategy is therefore an urban concentration and intensification strategy, with some growth dispersed to other areas.
	In this document I do not agree of more of the same. Adding even more properties to existing settlements who are struggling now to cope with the 1000s of new homes, with no improvements to the infrastructure, is not acceptable. It is destroying local identities such as Shepshed and within a decade it will be joined to Loughborough	Draft Policy LP2 and Draft Policy LP6 will ensure that the right type of housing, of the right quality, in the right locations can be delivered across the borough.
	and no longer recognisable as its former self; Shepshed Town. Rather with so many more properties being proposed in Loughborough & Shepshed mainly, there is enough to build them as one settlement or a new SUE. To the East of Loughborough there is plenty of land to do this and could butt up against the boundary of Loughborough ie. Cotes for example, which	
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EDCLP/35 SELAG -South	 developers are already interested in. Plus the Planners argument about "infrastructure would be too costly" would not apply in this case to this site. Loughborough, villages and towns already made larger need a respite and it does not seem right that large areas to the East of the Borough are not sharing the pain. Two versions 1. I am writing to you as Chairman of SELAG -South and East 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report
and East Leicestershire Action Group	Leicestershire action Group. We are opposing the proposed A46 Expressway which is Central to the SGP. Your Plan seems to be predicated on the assumption that the A46	(2019) explored the implications of the growth scenarios, and the preferred development strategy.
	Expressway project will go ahead. May I point out that this has not yet been agreed and may never happen. Our reasons for our opposition have been explained previously but centre mainly on the	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	opposition have been explained previously but centre mainly on the lack of need for such a project which will scar a large part of rural Leicestershire damaging permanently some of the most beautiful countryside in England. There is room for improvement of the existing M1 and Western Bypass so a new road is not necessary. In addition scant regard has been given re the effects on the environment if such a road is built. Are you serious when you talk about a Climate Emergency. Are you serious when you talk about damage to bio-diversity? We accept the need for more housing but we do think the numbers need looking at. These are not based on the latest information and are needlessly high. In addition Leicester City must be made to take more responsibility for their housing needs and not be allowed to dump this problem on the County. Roads into Leicester are already over congested so building more houses where many residents will be commuting into Leicester will add to this problem. It makes sense to build houses where the work is or in hubs where there are good transport links to Leicester or other centres. My last point concerns wind turbines. These are ugly things damaging bird and other life. I was under the impression that it had	The Council continues to support the objectives of the SGP and is working with the other local authorities to establish how the aims can be delivered. The planning, costing, and delivery of sub-regional scale infrastructure (such as the A46 Expressway) will be determined via the SGP partnership and organisations such as Leicestershire County Council.
	been accepted that land based wind turbines are not nearly as efficient as those built at sea or on the coast so this seems more to do with virtue signalling than any efficient contribution to the increase in renewable energy. Land owners may benefit but this should not be a reason for the construction of such monstrosities.	
	 2. I am writing to you as Chairman of SELAG -South and East Leicestershire Action Group. We are opposing the A46 Expressway proposal which is a core part of the SGP. Our arguments for this 	

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	opposition have been relayed to you already but are mainly based on the lack of need for a new road which will scar a large part of rural Leicestershire causing huge environmental damage. Improvements can be made in the existing roads namely the M1 and the Western Bypass. Such improvements would be more than capable of handing the expected increase in traffic thus rendering any new road unnecessary. We accept the need for more housing but consider the numbers unduly high. They are not based on the latest government information In addition we feel that Leicester must not be allowed to dump its housing problems onto the County. It makes sense that the houses should be built where the work is or in hubs where there can be good transport links to Leicester or other centres. Many of the new residents in the new housing will want to commute to Leicester. Roads into Leicester are already over congested and the new houses will make this congestion even worse. Much more thought needs to be given to environmental issues. These include climate change and biodiversity. Are you serious when you declare a climate emergency. Building houses in open countryside and where long commutes into work are necessary does not show you are prepared to change behaviour. You cannot protect the environment by simply taking the easy answer and doing the same as before. Lastly can I mention the suggestion re more wind turbines. These are ugly things and do much harm to bird and other life. I thought it had been accepted that land based turbines were not nearly as efficient as sea or coastal based turbines. Why are you proposing to build more in Leicestershire? Is this merely virtue signalling? Landowners may be keen on such turbines but that is no reason for Charnwood to agree to build more.	
EDCLP/36 Mr & Mrs Atkins	The Local Plan has a lot to say over green issues. It recognises climate change and has multiple environment policies but its bottom line is dependence on the private car rather than on public transport. Witness its unquestioned support for the Leicester and Leicestershire SGP (Chapter 4 Development Strategy para 4.5 page 16 and Chapter 9 Infrastructure Delivery para 9.7 page 110) the central plank of which is the A46 Expressway which would carve a swathe through the borough's finest countryside. The Expressway's possible route and its impact on local communities are missing from this Local Plan and planners at the Syston public exhibition admitted that the new Local Plan, whilst openly supportive of the SPG had not taken account its transport	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council continues to support the objectives of the SGP and is working with the other local authorities to establish how the aims can be delivered. The planning, costing, and delivery of sub-regional scale infrastructure (such as the A46 Expressway) will be determined via the

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	implications.	SGP partnership and organisations such as Leicestershire County Council.
EDCLP/38 John Malpus	Almost 1800 houses are proposed for the Syston/ East Goscote/ Rearsby/ Queniborough area. This amounts to approx 3500 cars and 4000 patients plus many children for local schools.	The Council is aware of the impact of development on services, facilities, and infrastructure.
	 Health – The East Goscote Surgery recently closed due to the retirement of the practice GP. The CCG were not able to find a replacement. There is a current shortage of GPs. The 1400 patients moved to other practices, with the majority moving to Syston Health Centre. There is a long waiting time for appointments there. What will happen if these houses are built? Traffic – A huge increase of cars in the area will cause an increase in air pollution. A Charnwood report published earlier this year indicated that in some parts of Syston the Nitrogen levels were rapidly rising towards the maximum allowable. Land – Some of the sites proposed involve good agricultural land. As agricultural land is swallowed up around the country, UK will be more reliant on imports therefore the economy will suffer. 	The impact on healthcare, the transport network, air quality, and the loss of agricultural land are all considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development, and agree any necessary mitigation measures.
EDCLP/39 Lynda Needham	This is like Ground Hog Day. Yet again Shepshed is the target for large development. In the foreword 'There is no shortage of landowners and developers wishing to see their land chosen' therefore it is not a requirement to support the major landowner at Shepshed. Our town centre is that of a village with narrow roads, incapable of taking more traffic. Our main through roads are congested and incapable of absorbing existing or future development The listed Garendon Park, within the WoLSUE ,(SA objectives 8) cannot be described as enhancing heritage or good for the environment with a major link road through from A6 to A512. It would be ludicrous to further increase development at Shepshed. It is not viable, safe or a healthy option and should be excluded. In the adopted plan 2015 the inspectors report on CS14 stated that no more development for Shepshed Growth change to East of Loughborough to correct the development imbalance that exist at West of Loughborough. SA appraisal seems again to reflect where CB want preferred development sites as it was in the draft plan adopted 2015. We are asked to make comments, but I expect these to be ignored and Shepshed should put up and shut up. Time for change Shepshed has had more than its share of development and it seems that it's being promoted solely to fit the planners need. Shepshed is a case for the opposite of what is set out in this policy	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a distribution of 2,000 additional dwellings at Shepshed) is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects. In general terms, the development strategy proposes to distribute 15% of the housing provision to Shepshed; with 36% distributed to the Leicester Urban Area, and 32% distributed to the Loughborough Urban Area.

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	which includes the Garendon Estate. New development at the cost to existing settlements amount to loss off open space and heritage. Loss off the green wedge, settlement identity and certainly not good for our environment. There needs to be a change of direction in growth away from these areas that's if CB is serious about environmental protection (as answered in Q 1).	
EDCLP/43 Mr & Mrs Cunningham	The Local Plan has a lot to say over green issues. It recognises climate change and has multiple environment policies but its bottom line is dependence on the private car rather than on public transport. Witness its unquestioned support for the Leicester and Leicestershire SGP (Chapter 4 Development Strategy para 4.5 page 16 and Chapter 9 Infrastructure Delivery para 9.7 page 110) the central plank of which is the A46 Expressway which would carve a swathe through the borough's finest countryside. The Expressway's possible route and its impact on local communities are missing from this Local Plan and planners at the Syston public exhibition admitted that the new Local Plan, whilst openly supportive of the SPG had not taken account its transport	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council continues to support the objectives of the SGP and is working with the other local authorities to establish how the aims can be delivered. The planning, costing, and delivery of sub-regional scale infrastructure (such as the A46 Expressway) will be determined via the
	implications.	SGP partnership and organisations such as Leicestershire County Council.
EDCLP/46 Darshan Patel	This is in response to the section outlined in the mentioned plan 'Location of Development' 4.25 - 4.34 and in relation to question 4. I strongly disagree with the outlined Strategy for East Goscote to be considered for preferred distribution of new homes. This decision has been made due to the fact that the current infrastructure is just about coping with the number houses in place within East Goscote and bordering area of Rearsby. A new housing development would add an immense pressure on roads via traffic, congestion and pollution via noise. I also feel that the fragile balance of environmental factors such as open fields and grassland that protect the village from flooding would be destroyed and put residents at risk if new houses were to be built. Our countryside needs to be conserved. A new housing estate between East Goscote and Rearsby would mean there is no clear demarcation between the two villages, and destroying the natural beauty of the area. The monetary cost of flooding to residents and an increase in traffic and noise pollution would need to be covered by the local authority	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm which flood zone the site falls within, and to confirm the necessary assessment work that would follow-on from that conclusion. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
	to all residents. A weekly compensation would need to be in place at a minimum of £1000 per week, per household for the foreseeable future.	intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional

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		dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/52 Shepshed Town Council	'The spatial strategy includes an A46 growth corridor around the south and east of Leicester terminating in the south east of Charnwood and an International Gateway in the area around the confluence of the A42 and the M1 motorway'.	The International Gateway is a proposal that will be delivered through a partnership approach, and collaboration between several different authorities and organisations.
	Suddenly there is no mention of Shepshed as part of an International Gateway, nor the role of the A512. Leicestershire	The SGP sets out that Shepshed is a part of the proposals for the International Gateway.
	County Council LLEP growth area report draft makes no reference of Shepshed's position regarding the International Gateway 'Our evidence tells us that there may be market interest in	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on healthcare is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development, and agree any
	developing further discount convenience retail, and that such new development be directed to Shepshed'.	necessary mitigation measures. The possibility of a new settlement was considered within the SA as part
	Asda, Tesco and Co-operative stores have recently been opened in Shepshed and it is doubtful if more are needed. Smaller specialist stores are what's required. Hallcroft was a missed opportunity for	of four different 'high-level' housing growth scenarios / distribution options; and two 'refined' options.
	retail as the former Britannia Inn site is mainly housing with only two retail units. 'The growth directed to Shepshed reflects the evidence of	The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	landscape and transport capacity and supports the Leicestershire International Gateway. It is proposed that the focus on regeneration and using new development to support and drive opportunities for restructuring the town to improve access to the services and facilities available'.	The preferred development strategy is therefore an urban concentration and intensification strategy, with some growth dispersed to other areas.
	How does the plan propose to 'restructure the town' and what additional services and facilities will be provided? Previous attempts to restructure and provide facilities has, in general, failed. The long-term plan of the NHS has not been taken into account, the provision of doctors' surgeries and schools has not been taken into account.	
	'Protect the intrinsic character of the countryside, including Green Wedges and Areas of Local Separation'.	
	The plan is to build on the countryside round Shepshed, including what is left of the Green Wedges and areas of local separation.	

Housing provision in Shepshed is put at 15% of armore than any other Urban Settlement. Only a small proportion of new employment land will be in Shepshed. The plan is to build exactly 15% of what? There is no reference within the plan to protect the character of green infrastructure/countryside. Travelling out of Shepshed is detrimental to the environment, due to the lack of local employment. These is no strategy for additional employment in Shepshed within this plan. The draft local plan includes both strategic and non-strategic policies. EDCLP/55 Silety Parish Courci apport to focus med development within than any and accesse that it apports to focus med development within than any and accesse to the focus and cover to the lack of the local grant to the strategic and non-strategic policies. The draft local plan includes both strategic and non-strategic policies. EDCLP/55 Silety Parish Courci recognet to the strate of the focus, including Step, indeed this fully recognet an the any and of the adved development and for all the the planet of the local plan will clearly identify which policies are strategic, and which are non-strategic. Silety Parish Courci recognet that the adved development and for all the the planet of the strategy and housing development. The draft local plan sets out a development strategy and housing development. Silety Parish Courci recognet that the adv CP will meet to the lack of the strategy and housing the off the local plan and the Silety Neighbourhood Plan, and has taken an objective approach to all the merger of the strategy and housing the form the planet. Silety Parish Courci divers to the order approach to all the the planet of the strategy and housing recerving a strategy of the planet of the	RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
consultations for the emerging local plan. It is unclear, therefore, why the draft CLP is proposing to allocate housing sites which would result in a housing requirement significantly higher than that proposed in the SNP.	EDCLP/55 Sileby Parish	other Urban Settlement. Only a small proportion of new employment land will be in Shepshed. The plan is to build exactly 15% of what? There is no reference within the plan to protect the character of green infrastructure/countryside. Travelling out of Shepshed is detrimental to the environment, due to the lack of local employment. These is no strategy for additional employment in Shepshed within this plan. We were disappointed to see that the Cotes Garden Development of over 1000 properties had been omitted from the plan. Sileby Parish Council support the overall approach to focus most development within urban areas and recognise that it is appropriate to disperse some (more limited) growth to other, less sustainable areas of the Borough, including Sileby. Indeed this is fully recognised in the Sileby Neighbourhood Plan and was acknowledged by the Independent Inspector at Examination who states in paragraph 98 of his report that "it is clear that the Plan provides for substantially more development than is required by the adopted development plan and for all but the highest end of the range of strategic options being considered for the emerging plan. The identification of several reserve sites in Policy HI provides some flexibility in addition to this." Sileby Parish Council recognise that the draft CLP will need to meet its full objectively assessed housing need and will almost certainly need to utilise the new national standard method in determining its housing requirements over the plan period. However, as has been pointed out in the response to questions 3a above the plan is not in conformity with the NPPF. It does not explicitly specify which policies are strategic and which are non-strategic and does not provide a housing requirement for neighbourhood areas. Sileby Parish Council object to the use of a global housing figure for the identified Service Centres. The only means of estimating the scale of housing required for Sileby over the plan period is by considering the sites identified in draft CLP Po	 Where necessary, the next draft of the local plan will clearly identify which policies are strategic, and which are non-strategic. The draft local plan sets out a development strategy and housing distribution strategy that conforms with the NPPF, by meeting the local housing needs, as determined by the Standard Methodology. The Council is mindful of the relationship between the draft local plan and the Sileby Neighbourhood Plan, and has taken an objective approach to calculating need and establishing a policy framework that achieves sustainable development. The draft local plan proposes to allocate three of the six sites identified in the NP. For context, the NP identifies three further sites, two of which are existing employment areas (and identified for protection in the draft local plan); and the third site is used as allotment gardens. The Council's proposed housing sites have been informed by the SHELAA and SA process. The sites are deemed suitable, available, and

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	The draft CLP contains a number of references to the importance placed upon neighbourhood plans including a reference in draft CLP Policy LP1 itself and this is welcomed. However, other key policies of the draft CLP are clearly at odds with these sentiments. There is no specific recognition or reference in the draft CLP to the Sileby Neighbourhood Plan despite its recent consideration through independent examination and subsequent referendum. The SNP's approach to meeting its housing needs by including reserve sites was supported by Charnwood Borough Council but this is not recognised at all in the draft CLP which now sets aside the policies of the SNP and instead, allocates a significantly greater level of housing to Sileby, including a large site outside the identified Limits to Development for 228 dwellings.	
	In order to address the shortcomings apparent above, Sileby Parish Council proposes that the draft CLP is amended as follows:	
	 The CLP should set out a clear differentiation between strategic and non-strategic policies and indicate that Policy LP1 (together with other relevant policies) is a strategic policy; The CLP should include an individual housing target for each of the Service Centres, either within Policy LP1 itself or in supporting text based upon evidence of local housing needs and population of each of the Service Centres in order to demonstrate that housing provision has been distributed in a sustainable and proportionate way having regard to the overall plan strategy of urban concentration and the available alternatives; Sileby accommodates approximately 23% of the population of the Service Centres⁴ but based on the analysis of housing delivery in the recent SNP plus the additional allocations/sites identified in draft CLP Policy LP3, it would appear that Sileby is expected to deliver almost 40% of the total housing provision identified for the Service Centres⁵ - a figure which lacks any objective, evidenced justification within the overall development undermines the Vision and Objectives of the draft CLP and casts aside the recently made policies and proposals expressed in the Sileby Neighbourhood Plan. The preferred development strategy and draft CLP Policy LP1 should be reviewed and re-cast to properly reflect local aspirations as evidenced in existing Neighbourhood Plans. 	
	 The 10th bullet point which states that development proposals will be supported where they "contribute to local priorities identified in neighbourhood plans" should be amended and combined with the 11th bullet point to state that proposals will "only be supported where they are in accordance with policies in the CLP and local (non-strategic) policies set out in Neighbourhood Plans". This will reward those communities which seek to positively plan for the needs of their areas and reflects the spirit of localism embodied in the neighbourhood plan system as well as advice in the NPPF. 	

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	⁴ Estimated by using figures for the Service Centres set out in the Settlement Hierarchy Assessment in the Council's Evidence Base ⁵ By taking the SNP housing supply plus the Reserve Sites, and then adding the draft CLP allocations (making sure not to double count the draft CLP allocation and SNP Reserve Sites)	
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	We broadly concur with the development strategy which is based on urban concentration and intensification including development at the Service Centres, with lesser development elsewhere. We note that the strategy makes provision for an additional 2,000 homes on the edge of Leicester, 2,000 new homes at Loughborough, 2,000 homes at Shepshed, 1,000 homes directed to service centres and 800 homes to other settlements. However, given that we support the high growth strategy we consider that provision should be made for around 4,500 – 5,000 additional new homes on the edge of Leicester (including at Service Centres which are on the edge of Leicester such as Anstey), 2,500 at Loughborough, with the distribution at the other settlements remaining more or less the same. We do not support the concept of a new settlement due to the long lead in time and the likely impacts on the environment. We consider that development should be concentrated within and adjoining existing settlements, particularly Leicester where it can take advantage of existing infrastructure, availability of jobs and access to high level services, public transport and better meet the sustainability criteria.	 The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/63 Cllr David Snartt	Draft Local Plan, The Overall Approach/Vision. I have concerns that the main thrust of the Draft Local Plan does not fit with the findings of the Strategic Growth Plan, Leicester and Leicestershire. I refer to the statement within this document, where it is stated: To date, the majority of new housing in Leicestershire and Leicestershire has been built on small and medium-sized sites in the city, market towns, villages and rural areas. Some of this development has been unplanned. Often these developments make little or no contribution to infrastructure or services, and instead, rely on existing facilities. This has created significant problems. Some communities feel overwhelmed by the speed and scale of change, others are disadvantaged by pressure on local schools, health centres and recreation facilities. Congestion on local roads and public transport is a frequent cause of complaint. Our strategy proposes to build more development in major strategic locations and to reduce the amount that takes place in existing	 The overall spatial strategy is one of urban concentration and intensification. 83% of the planned growth is set to be delivered in the higher order settlements, e.g. Leicester Urban Area, Loughborough Urban Centre, and Shepshed Urban Area. 18% of the planned growth is set to be delivered in the Service Centres and Other Settlements. This approach is supported by the analysis in the SA, where a series of potential alternatives were considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.

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	towns, villages and rural areas. This will allow us to plan for new	
	housing and employment together with new and improved roads,	From these initial high-level options, seven more 'refined' and locationally
	public transport, schools, health services, local shops and open	specific options were defined. Whilst appraising these options, the
	space.	Council developed a 'Hybrid' option.
	Looking at the numbers of dwellings built in the current plan period	Lifting states the Ocean dileteries OA Departments at the title (it is displayed in the
	2011 to 2028 you can already see Service Centres and Other	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is
	Settlements are well over the stated commitments by some	the spatial strategy option that has the fewest significant negative effects,
	considerable amount by 2019. Therefore, in my view, this new Draft	and the greatest significant positive effects.
	Plan should have acknowledged that this amount of dwellings already agreed in Service Centres and Other Settlements are	
	having the precise detrimental impact on these areas as outlined in	
	the Leicester and Leicestershire Strategic Growth Plan.	
	To illustrate my concerns, I note that considerable development	
	has already taken place within the village of Anstey. This has	
	already caused some unease with local residents, yet it is still	
	planned to build another sizable development designated in the	
	Draft Plan. I note the contents in a letter sent by the then Director of	
	Highways, Leicestershire County Council which stated: our view is	
	that the situation with congestion and delays at The Nook, Anstey	
	is now reaching a level where it can be considered as being	
	severe, We are likely to recommend refusal on any further	
	development in Anstey which will have a material impact on The	
	Nook.	
	In my opinion, changes to this Draft Plan are necessary because of	
	the imbalance of the current numbers of dwellings built and	
	permission granted during the lifetime of the current Local Plan.	
	It needs to reflect on the wording in the current Local Plan that	
	made it possible to build over the designated numbers of dwellings	
	for Service Centres and Other Settlements, in my view, "to build at	
	least" needs to be removed and numbers of dwellings kept in line	
	with the housing provision strategy. I also note that further development is planned within Sileby. This proposes to develop a	
	site which has been rejected through the appeal process within the	
	current Local Plan.	
	During the time of the current Local Plan not one dwelling has been	
	delivered within the Sustainable Urban Extensions. This has put	
	pressure on the Service Centres and Other Settlements. This is	
	why I state that the Draft Local Plan should deliver the numbers of	
	dwellings in line with the stated numbers of housing provision and	
	strategy. In my view, there is no guarantee that this will happen	
	within the new Draft Plan and we could see again an imbalance in	
	the numbers of dwellings without the necessary infrastructure or	

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	services. This again would be in direct conflict with the Strategic Growth Plan, Leicester and Leicestershire. In my opinion, the Draft Local Plan should take into account the Strategic Growth Plan as stated above and the over planned development numbers in Service Centres and Other Settlements during the current Local Plan period. Therefore, reduce the provision of housing in these categories within the Draft Local Plan, especially where known infrastructure pressures and service provision exist. It is becoming clear that the decisions made during the current Local Plan are already impacting on local communities without improved infrastructure and services.	
	Proposed Hierarchy Categories. Stated in the Draft Local Plan, Other Settlements have some of the services and facilities to meet day to day needs of residents. Small Villages or Hamlets are settlements that have limited services and facilities to meet the day to day needs of the residents. It is also stated in the Draft Local Plan: <i>It is proposed to direct development to those locations where there is a genuine opportunity to walk, cycle or use public transport and which reduce the need to travel by private car. It is proposed to direct development away from the most environmentally sensitive <i>locations and ensure a balance between homes and jobs.</i> Since the current Local Plan was adopted in November 2015 the circumstances that have occurred within the village of Newtown Linford have, in my opinion, made the case for this village to be within the Small Villages category. During the current Local Plan Newtown Linford has lost its' shop which sold everyday items. It is also about to have its bus service reduced to a three hourly service during the week and Saturdays with no Sunday and Bank Holiday service, therefore, the main mode of transport to go to work due to the reduced bus service. I also note there are no cycle lanes in the area to encourage cycling. Due to the changes to vital services that are used daily, I propose that Newtown Linford is placed in the Small Villages category. In summary, for residents within Service Centres and Other Settlements to have confidence that the Draft Local Plan will deliver for their communities. There needs to be more certainty that this Plan will deliver the outcomes in line with the Strategic Growth</i>	

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	Plan, especially the necessary infrastructure and services that don't just rely on existing facilities. Because of the extra development that has taken place in Service Centres and Other Settlements during the current Local Plan many residents do feel overwhelmed with the speed of change within their communities and would agree with the statements made in the Strategic Growth Plan Leicester and Leicestershire. This has been exacerbated by the imbalance of development by the inability to deliver housing within the Sustainable Urban Extensions.	
EDCLP/65 Mr W Leek	Agree - So long as separation zones between settlements, especially to the west of the A6 Loughborough-Leicester corridor, are maintained.	Noted – support is welcome. The Areas of Local Separation are an important element of Draft Policy LP1.
EDCLP/67 Cossington Parish Council	[further comments provided under Q8] Thank you for giving the Parish Council the opportunity to write their views regarding the Charnwood Draft Local Plan. Classification – The Parish Council don't think Cossington should be classed as an 'Other Settlement'. These are settlements that have some of the services and facilities to meet the day to day needs of the residents. Unfortunately, we do not have such services – no shops and few businesses, just a pub, garden centre and a primary school (which is oversubscribed). We should be classed as a 'Small Village or Hamlet' – A settlement that has limited services and facilities to meet the day to day needs of the residents.	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of the settlement hierarchy for Charnwood. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and
	We as a Parish Council are concerned that current residents cannot get planning permission to infill with houses on their own land yet people who do not actually live in the village can build over 100 houses. This does not seem fair or ethical. In summary, the potential proposed number of houses compared to the size of the existing village is much too high. The proposal for an additional 115 houses represents almost two-thirds of the size of the existing village. Taking into account the issues we already have	 approaches to the distribution of nodsing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	with flooding, traffic flow, dangerous parking (during the school run period) and speeding, the additional traffic flows would cause severe additional problems. We do not have the road infrastructure (some parts single track), or the ability to create an acceptable infrastructure, to cope with any additional traffic, whether generated from the village or additional throughput.	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/74 Mr Hussain	To be totally honest, I disagree with the entire strategy because the delivery of it can be ameliorated on simply by following a more cost-effective method for housing needs by way of longer-term compassionate investment strategies for Stakeholders for their	Noted – the draft local plan addresses the objectively assessed needs for local area, as described in the NPPF.

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EDCLP/78 Queniborough Neighbourhood Plan Steering Group	ROI. The least amount of disruption that generates a greater community good, is a far better endeavour than delivering any form of <u>unnecessary</u> disruption to any of our communities for a lesser effect of community good and to a great extent a lesser degree of disruption to our environment. Our collective time-binding energies are being wasted on an astronomical scale because our LA massively fails to take the fullest advantage of every case scenario for the advancement of their respective communities. It's as though the LA don't want to advance communities because class distinction, "seemingly", is getting in the way of creating society's betterment. Queniborough is defined as an 'Other Settlement' in the Local Plan, so does not have the services and facilities to support major housing developments. 'Other settlements' are required to take 794 houses in total as part of the Local Plan. In the last few years, Queniborough has had an additional 176 houses built at Barley Fields, Barkby Road and 101 at Millstone Lane. This is an increase of 277 houses. Therefore, Queniborough alone has already taken over 50% of the allocated housing for all 'other settlements' identified in the current Local Plan. In this Draft Local Plan, only 5 out of the 14 'Other Settlements' are to take the additional 794 homes, they include the villages of Cossington, East Goscote, Hathern, Queniborough and Rearsby. It is proposed that Queniborough Lodge, with 132 proposed houses (b) HS71, Land off Melton Road, with 55 proposed houses and (c) HS72, Land at Three-Ways Farm, with 100 proposed houses This would mean that the Parish of Queniborough, alone, would take 30% of the whole housing stock for 'other settlements'. As previously stated, Queniborough would have increase of 277 houses, which means Queniborough would have increased in size by over 60% and as such Queniborough would have increased in size by over 60% and as such Queniborough would lose the 'character of the village'. In additional housing	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. For the purposes of the new draft local plan, Queniborough has two proposed allocations, amounting to 155 new dwellings.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	Draft Local Plan, that states 'Our plan directs 794 homes to Other Settlements but allocates sites for 634 new homes in these villages. These sites have been identified by seeking to avoid significant adverse environmental effects, ensuring that residents of new homes have access to a half hourly bus service, and avoiding overloading a particular village or group of villages. For the remaining housing development in Other Settlements, we consider that local communities have an important role in identifying sites through neighbourhood plans. We will work with neighbourhood planning groups to set appropriate housing targets in Other Settlements where a neighbourhood plan is to be produced.' Queniborough Lodge (HS11) which is listed in the Draft Local Plan as being a Housing Site allocated to Syston is actually within Queniborough's Designated Neighbourhood Area, which is the Parish Boundary. In addition Queniborough Lodge is the proposed site for housing development, in the village, in our Draft Pre- submission Neighbourhood Plan 2019-2028 as our Neighbourhood Plan Policy Q11. The Proposed Local Plan is wanting Queniborough to take 287 additional houses for 'Other Settlements', together with 223 at East Goscote (HS67) and 47 at Rearsby (HS73). That is a total of 557 houses or 59% of the total housing allocation for 'other settlements' within a 1 mile square area of Charnwood. Surely, this additional housing is also contrary to Point 4.35, within the Draft Local Plan. The proposed housing sites of:- HS8 with 157 houses in Syston HS71 with 55 houses in Queniborough HS72 with 100 houses in Queniborough HS67 with 223 houses in Rearsby HS73 with 47 houses in Rearsby	
	So, a total of 922 proposed new houses to be built within a one mile square area of Queniborough. Surely this is not a sustainable approach to housing that is in the Draft Local Plan. In addition this concentration of housing is not sustainable within the terms of the NPPF, as the infrastructure cannot meet the additional demands and the individual character of <u>all</u> the local communities will be destroyed. Therefore, QNPSG asks for Charnwood Borough Council to	

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	reconsider its approach to seeking to meet it housing targets by placing developments in this way. We would like to see explored the creation of a new village, perhaps the re-development of Wymeswold Airfield, so that housing targets can be met in a properly planned and sustainable manner rather than placing	
EDCLP/80	unsustainable growth on existing settlements. Reference to heritage within Environmental Impacts is welcomed in	Noted – support is welcomed.
Historic England	the table on page 24.	
EDCLP/83 Berrys on behalf of Moss Solicitors	This representation is made in support of the subject land 'Land at 83 ('Northfield') and 87 Cotes Road, Barrow upon Soar' to be allocated as either a purely housing allocation or as a residential-	Noted – the Council acknowledges receipt of the submission for Land at 83 (Northfield) and 87 Cotes Road, Barrow upon Soar.
	led mixed-use development in accordance with the Local Plan Policy LP3 of the emerging Local Plan. In the circumstances it is	The site will be assessed as part of the next stage of preparing the local plan.
	Policy LP3 of the emerging Local Plan. In the circumstances it is considered that the site could reasonably be expected to deliver approximately 90 homes across its entirety. The main thrust of this representation is therefore to object to the emerging Local Plan Policy LP3, which should be amended to include the subject land as a housing/residential led mixed-use allocation for development within the emerging Plan. The site is an edge-of-settlement location to the west of Cotes Road which abuts the main built-up framework of Barrow upon Soar at the western edge of the village. The site comprises two detached dwellings (nos. 83 'Northfield' and 87 Cotes Road), an outbuilding and extensive areas of garden land to the side and rear of both properties. The site extends to approximately 3.98 hectares in gross area and comprises a mixture of greenfield and brownfield land. The site is evidently part of the village built up area and site which forms part of the urban fabric of Barrow upon Soar. The site is integral to the built-up area, and merits a stand-along pure residential, or residential-led mixed-use allocation. Allocating the subject land will provide suitable and appropriate opportunities for residential or mixeduse development proposals,	plan.
	Including the provision of appropriate-scale community or leisure/recreation uses. Attention is drawn to the fact that Barrow upon Soar has historically, and is currently identified as a settlement which can	
	accommodate a reasonable quantum of growth, including additional housing/mixed use given that it is a reasonably sustainable settlement with primary schools, secondary school, retail and leisure offer, public houses, restaurant/cafes, churches	
	and other rural-based amenities and services. It is considered that	

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EDCLP/91 Queniborough Parish Council	an appropriate level of sustainable residential/mixed use development can and should be delivered at land at 83 and 87 Cotes Road, Barrow upon Soar (the subject land). The subject land has no physical or legal constraints to redevelopment of the site, and there are therefore no factors which would hinder the suitability, achievability or delivery of sustainable housing at this location. The allocation for development of the subject land would represent a logical 'rounding off of both the physical urban boundary of Barrow upon Soar and the built form of the village in this area of the settlement, without resulting in harm to the openness of the countryside or the amenity of neighbouring properties. The development of the site would visually complement the existing housing along Cotes Road/Blake Close. Access will be taken from the existing access point along Cotes Road to no. 87. If necessary, the access will be upgraded to serve a residential/mixed use development within the site and can be enhanced to sufficient width and provide adequate visibility splays in both directions along Cotes Road. The Council notes that Queniborough is still categorised as an 'other settlement'. Other settlements are to take 800 homes in the plan. It is proposed that Queniborough Lodge, which although listed in the proposal as in Syston is in Queniborough. Queniborough Lodge is proposed in the Pre-submission Queniborough Neighbourhood Plan 2019-2028 as the site identified for housing development in the village Neighbourhood Plan Policy (Q11). In addition, the Proposed Local Plan is asking Queniborough to take 287 houses of the 800 for other settlements, together with 223 at East Goscote, and 47 at Rearsby. A total of 557 out of the 800, or 70% of this total. This together with another 1,191 houses in Syston will put a completely uprecedented strain on services and infrastructure. It is already very difficult to get a doctor's appointment in under two weeks and parking in Syston is problematic at busy times. The closure of the healt	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. For the purposes of the new draft local plan, Queniborough has two proposed allocations, amounting to 155 new dwellings.

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EDCLP/102 Simon Bates EDCLP/102 Simon Bates EDCLP/102 Simon Bates EDCLP/102 Simon Bates EDCLP/102 Simon Bates EDCLP/102 Simon Bates Cours Settl and Unfor busin is ov Ham mee It wo com prop of th alreat traffi have infra	lied to the sustainability criteria of the NPPF shows that the titional sites of HS 71 and 72 are not sustainable with in the ns of the NPPF and should be removed from the proposed al Plan. The sites in Syston at HS8 and HS9 further question sustainability of the approach taken in the Local Plan. The incil does question the overall approach in the plan and the ification for placing so much of the 'other settlements' housing in h a concentrated area as Syston/Queniborough/East scote/Rearsby. The Council contends that this concentration is sustainable within the terms of the NPPF, as the infrastructure not meet the additional demands and the individual character of munities will be destroyed. The Council asks the Planning hority to reconsider its approach to seeking to meet it housing test by placing developments in this way. The Council would like ee explored the creation of a new village so that housing targets be met in a properly planned and sustainable manner rather n placing unsustainable growth on existing settlements. taking one of our local councillors I was told that The Parish incil don't think Cossington should be classed as an 'Other thement'. These are settlements that have some of the services facilities to meet the day to day needs of the residents. ortunately, we do not have such services – no shops and few inesses, just a pub, garden centre and a primary school (which versubscribed). We should be classed as a 'Small Village or nlet' – A settlement that has limited services and facilities to at the day to day needs of the residents. ould appear the potential proposed number of houses npared to the size of the existing village is much too high. The poseal for an additional 115 houses represents almost two-thirds he size of the existing village. Taking into account the issues we ady have with flooding, traffic flow and speeding, the additional ic flows would cause severe additional traffic, whether generated in the village or additional throughput.	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of the settlement hierarchy for Charnwood. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

RosconnsettlementsStrategic LandsustainableThe percentsettlement hthe proposebeen stateddemonstratethe needs ofperiod and tipolicy is theirCouncil intera device throincrease eadflexibility in laFurther, in thassumptionsCouncil hashierarchy anextensions)	all Development Strategy and the categorising of	The lubrid ention environed the notesticling sets of a distribution
may wish to trajectory an evidence is p The hybrid of developmen allocated to noted that th directly with that only 93 Centres. As off Cotes Ro suitable deve Availability A in this location greater flexit large strateg Borough are	Ints within that hierarchy is logical and presents a pole strategy for future development in the Borough. Interaction is based on both currently committed sites and used allocations contained at Draft Policy LP3. As has ted above, the Council has not published evidence that rates the extent to which this collection of sites will meet is of the Borough both in terms of quantum within the plan and timing of delivery. The insertion of such percentages in therefore not supported. It is not clear to what extent the intends to use these percentages as a monitoring tool or as through which to refuse development proposals that would each percentage. Such an approach would not promote in land supply. In the absence of evidence regarding the delivery ons of each site it is not possible to conclude whether the has placed too much emphasis on the higher levels of the <i>y</i> and the Leicester and Loughborough urban area (and ns) in particular. Please see comments made in answer to 3b relating to the delay of permitted development. RSL to make further representations on the Council's housing <i>y</i> and reliance upon these larger sites when associated is published. Id option that informs the selection of sites in the nent strategy includes an additional 1000 homes to be to Service Centres such as Barrow upon Soar. Whilst it is at the capacity of selected sites does not correspond with the numbers in the proposed option, table 4 indicates 931 dwellings are proposed to be allocated to the Service As is detailed in answer to further questions below, Land Road in Barrow upon Soar is confirmed as being a development location within the Strategic Housing Land ty Assessment 2018 ("SHLAA") and the allocation of land cation is not in conflict with the hybrid option. The of land in this location would therefore assist in providing exibility in land supply, particularly given the reliance upon thegic sites, to ensure that the housing needs of the are met in the plan period.	The Hybrid option appraised the potential impacts of a distribution strategy that has 1,000 new dwellings in the Service Centres. The impacts documented show the effect of such a scale of new development. The draft local plan, at Table 4 and in Draft Policy LP3 show the total new dwellings in the Service Centres as 931. To this extent, the SA has considered a greater level of development (and set of impacts) than is proposed in the draft local plan, the Council will produce a housing trajectory and a more detailed account of the delivery expectations for the proposed allocations.
Sue Barry risk to the er	ilding on flood plain, Greenfield sites because of increased e environment due to continuing weather pattern change. are joining up in Charnwood with large developments,	Flood risk is a critically important issue for the Council. The site assessment work has considered the flood risk category for

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	more tarmac, concrete, less green garden areas and more fields being taken between villages, leaving less space for natural flood plain. It isn't cost effective and is devastating for people when their houses flood, difficult insurance wise etc etc Counterproductive when building takes over. We need more natural wildlife areas for biodiversity, lots more. What's the point of building more and taking up natural landscape, destroying our earth, destroying wildlife we need them for our survival.	each site in the SHELAA database. Further flood risk assessment work will be taking place prior to the next draft of the local plan being produced.
EDCLP/121 Marie Birkinshaw	Yes, but important to consider how future house-dwellers can best work and live by using public transport, cycles or walking (especially as Charnwood is seen in the plan as a commuter base for those working in the cities closeby).	Draft Policy LP33 sets out the requirements to consider and provide sustainable transport infrastructure as part of new development.
EDCLP/125 Tim Birkinshaw	This looks satisfactory; I believe it is one that has largely worked in previous Local Plans. On retail needs ensure that suitable provision is made in the SUEs in order to reduce the need to travel, especially for food. Provision of a small (weekly) market in the Garendon SUE should be tried to encourage a local approach to shopping.	Noted – retail is a component part of the plans for the SUEs.
EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	The initial key question under this topic is - what is the make-up of the supply which is relied upon. This is vital to the draft Local Plan, where only approximately one third of future supply (7,252 dwellings from a total of 19,716) is to come from new allocations, with the remaining 12,464 comprising existing planning permissions and allocations. We note that the evidence base supporting the consultation fails to set out the detail behind this figure, so consultees cannot understand the sites comprising this supply or the assumptions which have been made about their deliverability or build-out rates. Data contained in the Council's 5-year housing land supply (as of 31 March 2019) only relates only to sites with planning permission. It reveals only their delivery for the 5-year period 2019 – 2024. No additional information is given regarding assumed delivery beyond 2024, either in total or within the plan period. It is impossible to know which sites, if any, have been discounted or had their delivery delayed or build-out rates reduced, and what assumptions the Council are making about likely lapse rates for consents which are not implemented. In this regard there should be proper scrutiny of current allocations proposed to be retained; and if proposed to be retained they should be the subject of new policies within the emerging Local Plan, with clear evidence and justification given for their retention and	In preparing the next draft of the local plan, the Council will produce a housing trajectory and a more detailed account of the delivery expectations for the proposed allocations.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/131 Dr M. & Dr R. Goodwin	accurate delivery rates that can be relied upon. Their contribution to meeting housing requirements in not insignificant and accordingly it would be inappropriate for them to be retained without further detailed scrutiny given it is around 6 years since their initial examination. It is clear that two thirds of the Local Plan's housing supply cannot be considered to be justified or effective, and significantly more detail is required as to how the total housing requirements are to be met, and the extent of additional allocations which the Local Plan needs to provide. Only once this has been established is it possible to consider the proposed distribution in a meaningful way. Notwithstanding the above, the principle of focusing development for new homes, in accord with the proposed spatial strategy, including Service Centres, which the Council's evidence has demonstrated are best placed to deliver the required quantum of development, is supported. The draft Local Plan notes page 24 that the strategy has been informed by individual site assessments. In this regard, it is important that this strategy continues to be refined through the plan-making process, as further information about individual sites becomes available. In the local plan there is no mention of bringing empty homes back into use. Before we start building new properties we should be exhausting existing housing stock and bringing any empty properties back into use. This would help mitigate the need to build some of the extra houses, particularly on smaller sites such as HS33. Bringing empty homes back into use should form part of the strategy. It's not clear what consideration has been taken regarding the number of student properties acto the strategy and has this been accounted for in the numbers? Again this would help alleviate the need to build so many new houses. It also mentions in section 5.36 that with an aging population there will be an increased requirement for specialist housing options. In many cases this would involve moving into a care h	Noted – whilst the number of long term empty properties in the borough is very low, it is a corporate priority to assist in bringing these properties back into use. This response will be used to inform the next stage of the draft local plan. The HEDNA report includes an assessment of specialist housing needs, and the Council has commissioned a Housing Needs Assessment, which will also calculate the need for specialist housing across the borough. This assessment will take account of the latest demographic data.

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CONSULTEE EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 numbers of new homes required by making better use of existing properties. We suggest that this should be taken into consideration before developing on more green spaces. We have an overall concern that the Plan has been written in the context of the Leicester and Leicestershire Strategic Plan (SGP), which Charnwood supports, a major component of which is the proposal for a new A46 Expressway through the attractive countryside of High Leicestershire to the east and south of Leicester. For an Expressway to connect to the A46 North it would need to pass through about five miles of Charnwood in the vicinity of Syston / Queniborough. In CPRE's view, the SGP is a flawed plan which emphasises development and road building and fails to address a number of key issues including climate change, sustainable transport and the protection of countryside and natural environment. The SGP's emphasis on the Expressway and its associated car based housing proposals appear to be at variance with the Charnwood Local Plan draft policies dealing with climate change, protection of biodiversity, countryside and green spaces as well as heritage assets. While we question the need for the number of houses required, we are broadly in agreement with an urban concentration and intensification strategy. However we have strong reservations about the way the numbers are distributed to different parts of the Borough. a) A focus on the edge of Leicester and on Loughborough is consistent with such a strategy. However, these sites have to be well served by public transport and an integrated transport system, take careful account of their impact on the built and natural environment and provide green spaces and green infrastructure as well as contributing to carbon neutral development. b) The SGP promoted the idea of the Leicestershire International Gateway around the A42, M1 and Midlands Airport. There has been much development, related to logistics and strategic distribution facilities, in this	The proposed Expressway is set out in the Strategic Growth Plan for Leicester and Leicestershire. Any final proposals will be delivered by Leicestershire County Council. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. A comprehensive plan for the development sites in Shepshed is proposed under the terms of Draft Policy LP3.

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EDCLP/147 Hoton Parish	 suggested in para. 5.7 it will be important to have a biodiversity strategy. With so many allocations proposed, a comprehensive plan for development around Shepshed would be beneficial. c) In addition, we consider that the proposed allocation of more new homes in the Soar and Wreake Valley service centres and settlements should be reconsidered with a view to preserving undeveloped land to absorb excessive rainfall and thus help to contain the evident flood risk to people and properties which is predicted to worsen. To summarise, CPREs main concerns relate to the size, number and distribution of new homes, the protection of green spaces and biodiversity, flood risk management, sustainable travel including the need for an integrated public transport system as well as measures to tackle climate change and poor air quality. 	Noted – support is welcomed.
Council EDCLP/263 Shearsby Parish Councillors: Martin Reynolds (Chair), David Durran, Lynn Cosgrove, Andy Sharp & Jon Gunnell	The undersigned as members of Shearsby Parish Council would like to raise the following comments regarding the Charnwood Local Plan, specifically, relating to the proposed A46 Expressway. - The local plan recognises climate change issues, which are underpinned by a number of environmental policies, yet the overall plan is dependent upon more roads and private car usage rather than improvements to public transport. - The A46 Expressway would carve a huge swathe through some of Leicestershire's finest countryside. Yet the actual route, it's impact on the environment & local communities, and a sound business case for the development are largely missing. - The Local Plan is not clear on what proportion of the proposed 38,000 houses to be built along the route of the Expressway, would actually fall within the boundaries of the Charnwood Borough. What is clear, is that the demand for housing is based on population growth figures which are out of date, and by adding a buffer of 1,300 additional houses. Recent published figures show a significant reduction in the rate of population growth and therefore future demand. We trust that you will take into account our comments when considering the Charnwood Local Plan.	The proposed Expressway is set out in the Strategic Growth Plan for Leicester and Leicestershire. Any final proposals will be delivered by Leicestershire County Council. The draft local plan proposes to deliver 19,716 dwellings over the plan period – 7,252 of these are new dwellings identified to be delivered through the 73 proposed allocations set out in Draft Policy LP3.
EDCLP/165	The wording in Draft Policy LP1 is "The overall spatial strategy for	The development strategy and distribution strategy have been analysed

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Dr S.J.Bullman	Charnwood, between 2019 and 2036, is urban concentration and intensification." So my response is: No. Table 4 says the preference is for zero new homes in Small villages/hamlets, Table in LP1 (unnumbered) says the current share of new homes	via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
	currently is only 0.1% of the total required. Almost excluding small villages/Hamlets from the burden of new homes gives them preferential status and heightens what is often considered to be	Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	exclusivity – and makes all homes in smaller places even harder for locals to afford.	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	Your policy appears to be directed to cram more and more housing into non-village ghettos. Housing need does not conform to this – it a widespread requirement across all areas, possibly more so in small villages than not.	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/168 Sue Norledge Rearsby Parish Council	Rearsby is a small medieval village designated as another settlement in the Charnwood hierarchy due to the lack of services available in this village of some 450 homes. The Pre-submission Version of the Rearsby Neighbourhood Plan looked at how to achieve sustainable development in Rearsby given the 58 recently completed properties and the 16 with planning permission on the former Convent site. Space has been identified within the NP for a small ribbon development along the old Gaddesby lane. This has been wrongly interpreted by the Charnwood Local Plan as a much larger site for 47 houses. The recent appeal for land along Melton road noted that "the provision of up to 66 dwellings in a village of 407 households (2011 census) would be considerably large development and in the context of the settlement hierarchy, in my view would not accord with CS policy CS1" Appeal ref APP/X2410/W/17/3190236. This would apply to this site of 47 houses as well.	The Other Settlements are identified to accommodate 5% of the total number of dwellings across the plan period. The sites identified in Draft Policy LP3 are those that have been appraised through the SHELAA and have been shown to be suitable, available and achievable.
	With the lack of services in the village, this size of development is not sustainable and would require private vehicle movements because of the limited public bus service, to access all local facilities for shops, doctors and chemists and employment.	
	Rearsby welcomes sustainable small-scale development and has work with landowners and planners on bringing the Convent site re development to fruition and the Rearsby House Farm development. The Parish Council has done multiple consultations with the villagers about the future provision for housing in the village and	
	has identified some areas suitable for exception site development	

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	for affordable housing but has not yet secured landowner approval for such development. For the borough council to suggest that the village can support such a large development is not in accordance with its own core strategy need to find sustainable locations for development and given the village has no demonstrable need for this housing as evidenced by the recent rural housing need survey, conducted on behalf of Charnwood. Further we note that the ribbon of Wreake valley villages of Queniborough, East Goscote and Rearsby are identified with a combined total of 425 houses within a space of two miles along the Melton Road. There is no identified local housing need at this level, so provision of these houses would be beyond the capacity of the local housing market to absorb them, making this uneconomic for the house builders. We request that the Local Plan be adjusted to reflect a development of 10 houses along Gaddesby Lane and not the 47 in the current version of the local plan. Table 3 sets out the Settlement Hierarchy for Charnwood. Within this, Shepshed is stated to the an 'Urban Settlement' which is the second to top tier and is defined as "A settlement that has a range and choice of services and facilities that meet the day to day needs of residents and physically or functionally forms part of a wider Leicester or Loughborough Urban Area". Other settlements included in this definition are Birstall, Syston and Thurmaston. We support Shepshed's designation as an 'Urban Settlement'.	OFFICER RESPONSE Noted – the Council considers that Draft Policy LP1 is in conformity with the NPPF and is sufficiently flexible to deliver the housing needs for the borough. Nevertheless, this response will inform the next draft of the local plan, where amendments to the policy wording will be considered.
	an urban concentration and intensification strategy with some growth dispersed to other areas in the Borough". Our Client supports this approach, particularly in focusing growth towards Shepshed.	
	Draft Policy LP1 states that Shepshed is to take 15% share of the housing provision, exceeded only by Loughborough Urban Centre and Leicester Urban Area. Our Client supports this, in that it recognises the sustainability of Shepshed. However the "Implementation of Spatial Strategy" section of the Policy, in particular the first paragraph which states that "Development proposals which do not accord with the pattern of development in the spatial strategy will not be considered compatible with the vision and will not meet the objectives of the plan and as a result	

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	will not be supported, even where there is a proven shortfall in the supply of homes" is inflexible. It is recommended that this is revisited and "unless exceptional circumstances are demonstrated" should be added in order to incorporate an appropriate level of flexibility.	
EDCLP/178 Mark Rose	Spatial Strategy The CLP must "provide a clear strategy for bringing sufficient	Draft Policy LP1 is clear that the plan is making provision for "at least" 19,716 new homes between 2019 and 2036.
Define obo Bloor Homes	amount and variety of land can come forward where it is needed" (NPPF para 23 & 59) in order to facilitate a continual supply of both market and affordable housing. Specifically the NPPF requires the CLP to "identify a sufficient supply and mix of sites, taking account	A more detailed housing trajectory will be provided as part of the next draft of the local plan.
	of their availability, suitability and likely economic viability" to meet the identified LHN, including a supply of specific deliverable sites for years 1 to 5 of the plan period, specific developable sites or broad locations for growth for years 6 to 10 of the plan period and,	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
	where possible, years 11 to 15 of the plan period (para. 67 & as defined in the Glossary). Later it states (para. 72) "the supply of large number of new homes can often be best achieved through planning for larger scale development, such as new settlements or	Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities". It requires that the plan-making authorities "identify suitable locations for such development where	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	this can help to meet identified needs in a sustainable way".	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (which includes Anstey as a Service Centre) is the spatial strategy option
	In that light, it is agreed that the preferred development strategy, based on the settlement hierarchy set out in Table 3, would be a	that has the fewest significant negative effects, and the greatest significant positive effects.
	robust and sound approach to meeting the identified housing needs in the plan period, in a manner that appropriately reflects the	
	geography of the Borough and wider HMA. However, in terms of the distribution of new homes as set out in Table 4 and Policy LP1,	
	it is not clear whether the figures given for each tier of the hierarchy are a minimum requirement or an anticipated supply. Either way,	
	the CLP should not seek to be unduly prescriptive in this respect. The settlement hierarchy puts an appropriate framework in place to ensure that a sustainable pattern of development is realised. It	
	would be entirely inappropriate to seek to restrict otherwise sustainable development in suitable locations, such as	
	Loughborough, Shepshed and the Service Centres, by setting an artificial cap within the policy, particularly if that prevents the	
	housing needs of the Borough, or of a specific locality, being addressed. There must be scope within the policy to allow the site	

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	specific merits of any given opportunity, and how it might address the specific needs of a locality, to be considered when allocating sites and determining planning applications.	
	Indeed, to accord with the NPPF's policy requirements, the CLP must facilitate a continual supply of housing from a substantial and wide "portfolio" of deliverable development sites (varying in scale, nature and location) with sufficient flexibility in the planned housing land supply to meet the identified housing needs of both urban and rural communities in the plan area. That will ensure a rolling 5 year housing land supply is maintained, that the overall housing requirements are met within the plan period, and that everyone actually has the opportunity of a decent home in a sustainable community. The CLP will then truly reflect the objective of the Housing White Paper 2017: Fixing our broken housing market (para. 1.29) that seeks to ensure "policies in plans allow a good mix of sites to come forward for development so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector".	
	Anstey	
	A key policy imperative of the NPPF is the provision of rural housing and the support that provides for rural communities. It requires planning policies and decisions to be "responsive to local circumstances and support housing developments that reflect local needs" (para. 77) and "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities" (para. 78). The PPG expands (Reference ID: 67-008-20160722): "People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities. Strategic policies will need to be informed by an understanding of these need and opportunities"	
	Given the widely accepted evidence of household sizes continuing to fall resulting in population decline in those rural towns and villages where no housing development is proposed, and that an ageing population historically results in reduced household expenditure, planned growth is essential to ensure that those communities continue to thrive and do not stagnate or even go into	

communities continue to thrive and do not stagnate or even go into

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	decline. The CLP must, therefore, ensure that the development needs of rural communities in the Borough are positively addressed and that the on-going role and function of the Service Centres such as Anstey, that are at the heart of those communities, is supported. The CLP should, therefore, consider and address the specific development needs of those key settlements as a fundamental part of the spatial development strategy to ensure their continued sustainability in the long term.	
EDCLP/179 Mark Rose Define obo Bloor Homes (HS37)	Spatial Strategy The CLP must "provide a clear strategy for bringing sufficient amount and variety of land can come forward where it is needed" (NPPF para 23 & 59) in order to facilitate a continual supply of both market and affordable housing. Specifically the NPPF requires the CLP to "identify a sufficient supply and mix of sites, taking account of their availability, suitability and likely economic viability" to meet the identified LHN, including a supply of specific deliverable sites for years 1 to 5 of the plan period, specific deliverable sites or broad locations for growth for years 6 to 10 of the plan period and, where possible, years 11 to 15 of the plan period (para. 67 & as defined in the Glossary). Later it states (para. 72) "the supply of large number of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities". It requires that the plan-making authorities "identify suitable locations for such development where this can help to meet identified needs in a sustainable way". In that light, it is agreed that the preferred development strategy, based on the settlement hierarchy set out in Table 3, would be a robust and sound approach to meeting the identified housing needs in the plan period, in a manner that appropriately reflects the geography of the Borough and wider HMA. However, in terms of the distribution of new homes as set out in Table 4 and Policy LP1, it is not clear whether the figures given for each tier of the hierarchy are a minimum requirement or an anticipated supply. Either way, the CLP should not seek to be unduly prescriptive in this respect. The settlement hierarchy puts an appropriate framework in place to ensure that a sustainable pattern of development is realised. It would be entirely inappropriate to seek to restrict otherwise sustainable development in suitable loca	 Draft Policy LP1 is clear that the plan is making provision for "at least" 19,716 new homes between 2019 and 2036. A more detailed housing trajectory will be provided as part of the next draft of the local plan. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (which includes Loughborough as the main Urban Centre) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
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	artificial cap within the policy, particularly if that prevents the housing needs of the Borough, or of a specific locality, being addressed. There must be scope within the policy to allow the site specific merits of any given opportunity, and how it might address the specific needs of a locality, to be considered when allocating sites and determining planning applications.	
	Indeed, to accord with the NPPF's policy requirements, the CLP must facilitate a continual supply of housing from a substantial and wide "portfolio" of deliverable development sites (varying in scale, nature and location) with sufficient flexibility in the planned housing land supply to meet the identified housing needs of both urban and rural communities in the plan area. That will ensure a rolling 5 year housing land supply is maintained, that the overall housing requirements are met within the plan period, and that everyone actually has the opportunity of a decent home in a sustainable community. The CLP will then truly reflect the objective of the Housing White Paper 2017: Fixing our broken housing market (para. 1.29) that seeks to ensure "policies in plans allow a good mix of sites to come forward for development so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector".	
	Loughborough	
	It is entirely appropriate to continue to direct significant growth to the Urban Centre of Loughborough at the top of the hierarchy and the most sustainable location for growth in the Borough. As the Consultation Document highlights, Loughborough is a market and university town that functions as the social and economic focus for the Borough, and inevitably it is the primary location where significant housing need and demand is generated. It contains a range of employment opportunities and higher order services that meet all of the day-to-day needs of residents and are accessible to	
	the surrounding area. There is, therefore, the opportunity to make convenient linked trips that would not be available in a number of the other locations alsowhere in the Borough Eurthermore, many	
	the other locations elsewhere in the Borough. Furthermore, many trips to these services, facilities and employment areas would be shorter than in other less sustainable settlements where residents	
	would be required to travel outside of the settlement to reach them.	
EDCLP/180	Question 4 asks for comments on the Council's preferred	Noted – the Council acknowledges receipt of the submission for Land at
Alex Prowse	development strategy and the way it allocates development to	55 Main Street, Ratcliffe on the Wreake.

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Astill Planning Consultants obo Mr Fothergill	 different parts of the Borough. It is noted that Table 4 of the Draft Local Plan indicates that provision is only being made for 23 new homes in the 12 Small Villages and Hamlets, including Ratcliffe on the Wreake. This equates to approximately 0.1% of the proposed housing requirement. It is considered that in order to support the future vitality of these settlements and support the viability of the local services and facilities in these villages, it would be beneficial to allocate some small sites, such as the land adjacent 55 Main Street in Ratcliffe on the Wreake, for small-scale housing development and thus slightly increase the proposed number of homes that are to be delivered in these settlements. In the interests of avoiding repetition, further comments in respect of this matter are provided as part of the response to Question 6 below, which also concerns the proposed development strategy for the Borough. 	The site will be assessed as part of the next stage of preparing the local plan.
EDCLP/187 Jim Smith	There would appear to be an intention to build outside the current settlement boundaries without looking for suitable space within those boundaries, and that very few of the dwellings that are usually allowed are of a style and price to be suitable for first-time occupiers, even though that is the demographic most at need for housing. Possibly better use could be made of the many developments, especially within Loughborough, that are occupied on a short-time basis by students and use these locations for local people looking for their first home. Possibly the students could be accommodated on campus. The Service Centre villages have supplied many developments recently, with a disproportionately greater number of dwellings (compared to other areas) being either built or approved to be built in the first two decades of this century. This increase in their populations has been without a matching increase in amenities and facilities. I refer to the result of a recent inquiry by a Government Inspector (Alex Hutson MRTPI CMLI MArborA) that the service centre villages have supplied 4323 homes of the 3000 required in the current local plan, and that over 1000 of these have been committed in Sileby alone. He further states (referring to the Gladman application):	 Draft Policy LP4 and Draft Policy LP6 set out the requirements to meet the various local housing needs in the borough. This includes providing affordable housing. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (which includes Sileby as a Service Centre) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

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	"To provide a further 228 homes adjoining Sileby would add materially to the already excessive level of housing commitments in Service Centres, when compared with levels the CS plans for, and to the disproportionate level of housing provision within Sileby".	
	Clearly the villages have been disproportionately targeted for building and now they should be considered as a last resort for building land.	
	In the draft LP (section LP16, page 66) the plan states that: "supporting development where the scale and character is designed and operated so as to cause no detriment to the character and appearance of the countryside", yet on page 39 land (HS64) is allocated for development outside the development envelope of Sileby for 228 houses. This would involve the destruction of two large fields of productive agricultural land and change the character of that area permanently.	
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	Table 3 in the Draft Plan outlines a proposed settlement hierarchy and Table 4 shows the distribution of new homes across the settlement hierarchy. The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements.	Noted – support is welcomed.
	The upgrading of Syston to an urban settlement that, along with Birstall and Thurmaston, physically or functionally forms part of the wider Leicester urban area is supported. This properly reflects the sustainability of the town and the wide range of services and facilities available and its good public transport connections to Leicester City by bus and rail.	
	As one of the most sustainable larger settlements in the Borough, it is appropriate that the strategy proposes to locate further housing growth to Syston.	
EDCLP/191 Stephen Harris Emery Planning on behalf of Hollins Strategic Land	 Distribution of Development Policy LP1 then sets out the distribution of the overall requirement into the following categories: Leicester Urban Area (Birstall, Syston, Thurmaston) – 36%; Loughborough Urban Centre – 32%; Shepshed Urban Area – 15%; Service Centres (Anstey, Barrow upon Soar, Mountsorrel, Quorn, 	Noted – support is welcomed.

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 Other Settlements – 5%; and, Small Villages and Hamlets - 0.1% 	
The Charnwood Settlement Hierarchy Assessment (March 2018) ranks Queniborough as a fourth tier settlement due to the village benefiting from a range of services and facilities that enhance the sustainability of the village. These include but are not limited to; Food shop; Post office; Primary school; Pre-school; Village hall; Church; Pub; Sporting facilities; and bus services to neighbouring larger towns such as Thurmaston, Syston and Leicester.	
 HSL support the council's recognition that Queniborough is a sustainable village and is capable of accommodating housing growth that will be needed in 'other settlements' over the plan period. This would meet the aims and objectives in the Framework, for example; Para 16: "Plans should: a) be prepared with the objective of contributing to the achievement of sustainable development"; Para 78: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby". 	
Table 3 in the Draft Plan outlines a proposed settlement hierarchy and Table 4 shows the distribution of new homes across the settlement hierarchy. The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements.	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
The scale of growth for Shepshed, taking account of the levels of growth the settlement has already accommodated in recent years, is not justified and does not represent the most sustainable strategy for growth. There are also potential issues of market saturation with	option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
this scale of growth, combined with development west of Loughborough, potentially slowing the delivery of housing in this location. For the smaller Other Settlements, some 800 homes are proposed, including a larger allocation at East Goscote. This approach does not make best use of the development	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (which includes Anstey as one of only six Service Centres; and Shepshed as one of four Urban Settlements – with the other three forming part of the wider Leicester urban area) is the spatial strategy option that has the fewest significant negative effects, and the greatest
	 Small Villages and Hamlets - 0.1% The Charnwood Settlement Hierarchy Assessment (March 2018) ranks Queniborough as a fourth tier settlement due to the village benefiting from a range of services and facilities that enhance the sustainability of the village. These include but are not limited to; Food shop; Post office; Primary school; Pre-school; Village hall; Church; Pub; Sporting facilities; and bus services to neighbouring larger towns such as Thurmaston, Syston and Leicester. HSL support the council's recognition that Queniborough is a sustainable village and is capable of accommodating housing growth that will be needed in 'other settlements' over the plan period. This would meet the aims and objectives in the Framework, for example; Para 16: "Plans should: a) be prepared with the objective of contributing to the achievement of sustainable development"; Para 78: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby". Table 3 in the Draft Plan outlines a proposed settlement hierarchy and Table 4 shows the distribution of new homes across the settlement hierarchy. The Council's preferred hybrid development strategy involves an additional 2,000 homes at Service Centres and 800 homes directed towards Other Settlements. The scale of growth for Shepshed, taking account of the levels of growth the settlement has already accommodated in recent years, is not justified and does not represent the most sustainable strategy for growth. There are also potential issues of market saturation with this location. For the smaller Other Settlements, some 800 homes are proposed, including a larger allocation at East Goscote.

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CONSULTEE	Opportunities available in the more sustainable larger villages, including Anstey. Anstey is identified as one of 6 Service Centres in Table 3. Given the range of services and facilities available in the settlement and its strong functional connections with the Leicester Urban Area, including frequent public transport connections, there is a strong case for Anstey to be designated as an Urban Settlement, as it has a range and choice of services and facilities meeting day to day needs of residents and functionally forms part of a wider Leicester Urban Area. Leicester City Council's recent presentation on its emerging Draft Leicester Local Plan usefully highlights the strong relationship Anstey has with the wider Leicester Urban Area. Anstey is identified as an urban growth area within a 30 minute bus ride of the City Centre. Extract from Leicester City Presentation on Draft Leicester Local Plan	significant positive effects. The Council acknowledges receipt of the submission for Land at Groby Road, Anstey. The site will be assessed as part of the next stage of preparing the local plan.
	Davidsons Developments has interests in land off Groby Road, Anstey (site reference PSH389). The development opportunity lies to the north and south of Groby Road and provides options for different scales of development depending on the Borough	

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EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold)	Council's requirements. The site could provide up to 400 homes to help meet future housing requirements in a highly sustainable location. The proposals offer the opportunity to secure improvements to the local highway network to provide an all movement junction between Groby Road and the A50 Markfield Road. This would provide an alternative route into and out of Anstey offering potential local highway improvements. There is also the opportunity through the wider land holding to provide improved informal recreational access to Green Wedge land in the form of a new Country Park. There is also the potential to enable the expansion of Anstey Latimer Primary School through the transfer of existing school play space onto adjoining land. Further comments on the development opportunity south of Anstey are included in the response to Question 8a. Table 3 in the Draft Plan outlines a proposed settlement hierarchy and Table 4 shows the distribution of new homes across the settlement hierarchy. The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements. The scale of growth for Shepshed, taking account of the levels of growth. For the smaller Other Settlements, some 800 homes are proposed, including a larger allocation at East Goscote. This approach does not make best use of the development opportunities available in the more sustainable Other Settlements, such as Wymeswold. The development strategy should be reviewed to direct some additional growth towards the Other Settlements to provide for a more sustainable overall strategy. There is therefore a need for growth in Other Settlements, and this should be directed to those most sustainable overall strategy. There is therefore a need for growth in Other Settlements, and this should be directed to those most sustainable overall strategy. There is therefore a need for growth in Other Settlements, and this should be dir	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (which includes Wymeswold as one of 14 Other Settlements) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council acknowledges receipt of the submission for Land at East Road, Wymeswold. The site will be assessed as part of the next stage of preparing the local plan.

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	restaurant, pharmacy, village hall and scout hut, which meet the day-to-day needs of residents. Additionally, Wymeswold performs well in terms of access to employment opportunities; Wymeswold Industrial Park and The Defence and National Rehabilitation Centre are both within close proximity of the settlement. For these reasons, development should be distributed to Wymeswold, as one of the more sustainable Other Settlements. Davidsons Developments has interests in land at East Road, Wymeswold (site reference: PSH 167). The site provides the opportunity to provide up to 45 new dwellings, including 40% affordable housing in accordance with the Council's requirements, together with an area of children's play space, informal recreation areas and surface water balancing. An outline planning application was submitted to Charnwood Borough Council in January 2018	OFFICER RESPONSE
EDCLP/207	(application reference number: P/18/0081/2), which include an illustrative layout of the site. The proposals also include for improved pedestrian access, including a proposed zebra crossing facility. Further comments on the development opportunity at East Road, Wymeswold are included in the response to Question 8a. Table 3 in the Draft Plan outlines a proposed settlement hierarchy	The development strategy and distribution strategy have been analysed
Guy Longley Pegasus obo Davidsons Development Ltd	and Table 4 shows the distribution of new homes across the settlement hierarchy. The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service	via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
(Sileby)	Centres and 800 homes directed towards Other Settlements. The scale of growth for Shepshed, taking account of the levels of growth the settlement has already accommodated in recent years,	Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	is not justified and does not represent the most sustainable strategy for growth. For the smaller Other Settlements, some 800 homes are proposed, including a larger allocation at East Goscote.	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	This approach does not make best use of the development opportunities available in the more sustainable Service Centre settlements including Sileby. The development strategy should be reviewed to re-direct growth towards the Service Centre settlements to provide a more sustainable overall strategy.	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (which includes Sileby as one of six Service Centres) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Davidsons Developments Limited has interests in land at Peashill Farm, Sileby that is a committed site with planning permission. There is scope for additional development on the site and this should be recognised in the plan.	The Council acknowledges receipt of the submission for Land at Peashill Farm, Sileby. The site will be assessed as part of the next stage of preparing the local plan.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Field Head)	The National Planning Policy Framework (NPPF) advises that local planning authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries (para 24). Paragraph 27 requires strategic plan making authorities to prepare and maintain statements of common ground, documenting how cross-boundary matters are being addressed. The Profile should be amended to explicitly record the cross-boundary interrelationships with larger settlements in adjoining districts. The relationship with Markfield to the west of the Borough boundary should be noted. The Council does not appear to have considered the scope for new development well related to adjoining settlements to help meet its requirements, and the relative sustainability of locations that adjoin and are well related to settlements in adjoining areas. This is less an issue about meeting any unmet needs but more about recognising that locations may offer more sustainable development opportunities due to their links with adjoining area. This is the case with the proposal to locate development in the south of the Borough, well related to the Leicester Urban Area. A similar assessment should be undertaken of opportunities for sustainable growth in locations in Charnwood adjoining larger settlements in neighbouring districts such as Markfield in Hinckley and Bosworth. Table 3 in the Draft Plan outlines a proposed settlement hierarchy and Table 4 shows the distribution of new homes across the settlement hierarchy. The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements. The scale of growth for Shepshed, taking account of the levels of growth. For the smaller Other Settlements, some 800 homes are proposed, including a larger allocation at East Goscote. The Settlement Hierarchy set out focuses on the settlements in the Borough boundary and does not consider the links betwe	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council acknowledges receipt of the submission for Land at Field Head. The site will be assessed as part of the next stage of preparing the local plan. The Council is engaging with Hinckley and Bosworth Borough Council to discuss cross-boundary opportunities. As part of meeting the requirements under the Duty to Co-operate the Council will be analysing joined-up solutions with Hinckley and Bosworth. Any development proposals would be agreed via a Statement of Common Ground.

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	more sustainable settlements in adjoining districts such as Markfield. The adopted Hinckley and Bosworth Core Strategy identifies Markfield and Field Head as one of four Key Rural Centres relating to Leicester. As a result, land at Field Head within Charnwood Borough also represents a potential location for growth in a location well related to the Leicester Urban Area. Davidsons Developments has interests in a parcel of at Field Head, south of Markfield Lane, extending to some 1.87 ha. The site is enclosed by existing residential development off Markfield Lane and Leicester Road and represents a suitable and sustainable development opportunity that should be allocated to provide some 50 dwellings. Further comments on the development opportunity are included in the response to Question 8a.	
EDCLP/209 Amy Smith Pegasus obo Jelsons	The Draft Local Plan sets out a proposed settlement hierarchy, explains how the preferred strategy was arrived at and summarises the preferred hybrid option as including an additional 2,000 homes on the edge of Leicester, 2,000 homes at Loughborough, 2,000 homes at Shepshed , 1,000 homes to Service Centres and 800 homes to Other Settlements. The proposed hierarchy is broadly similar to the hierarchy set out in the adopted Core Strategy, except that Syston is promoted to an urban settlement adjoining Leicester and Seagrave and Swithland are demoted to the lowest category of Small Village or Hamlet. The adopted Core Strategy hierarchy identified the Leicester Principal Urban Area as the priority location for growth, with the majority of the remaining growth directed to Loughborough and Shepshed. The Draft Plan explains the preferred development strategy as focusing housing and employment on the edge of Leicester, managed growth at Loughborough, some growth to Shepshed and smaller scale growth to Service Centres and Other Settlements. As currently framed, the proposed draft strategy does not adequately reflect the important role played by Loughborough as the most sustainable urban centre in the Borough. Whilst, in terms of overall distribution across the plan period, it is expected to take some 32% of the overall growth, in terms of new allocations proposed, Loughborough accommodates 26.5% of the growth whilst Shepshed is proposed to take some 28%. As a potential	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (which includes 2,000 new dwellings at Shepshed) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

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	location for growth, compared with development adjoining Loughborough, Shepshed does not offer the same level of access to services and facilities including access to higher order services in Loughborough Town Centre, employment opportunities and access to rail services at Loughborough rail station.	
	The scale of growth proposed to be directed to Shepshed, taking into account the scale of growth it has already accommodated, is not justified and does not represent the most sustainable strategy for growth that should seek to focus development on the most sustainable sites around the Loughborough Urban Area. The settlement hierarchy defines Shepshed as an urban settlement on the basis that it has a range and choice of services meeting day to day needs and physically or functionally forms part of the wider Loughborough Urban Area. The proposals for allocation should therefore be considered in the context of Shepshed's relationship with the wider Loughborough Urban Area.	
	The proposals to direct some 2,000 homes to Shepshed, with over 1,300 homes on sites to the west of the town, do not represent the most sustainable option for directing growth to the wider Loughborough urban area. The scale of growth proposed to be directed towards Shepshed should be reviewed in the context of opportunities for sustainable growth well related to the Loughborough Urban Area.	
	Paragraph 4.33 of the Draft Plan suggests that the growth directed to Shepshed is intended to support the Leicester and Leicestershire's Strategic Growth Plan proposals for a Leicestershire International Gateway. This aims to focus significant development close to the M1 and M42 junction close to the larger employment centres at the East Midlands Gateway Rail Freight terminal and the East Midlands Airport. The Growth Plan Strategy is to build more development in major strategic locations and to reduce the amount that takes place in existing towns, villages and rural areas, allowing planning for new housing and employment together with new and improved roads and other infrastructure. It is not clear how the proposal to focus some 2,000 homes at Shepshed supports this strategy or the extent to which good connections to the major employment locations around the East Midlands Airport could be achieved.	

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	Jelson Limited has interests in land to the east of Loughborough at Cotes where there is the opportunity to secure the development of a highly sustainable new village (Riggets Green), well related to the Loughborough Urban Area with the potential to provide 1,500 new homes, 5 hectares of employment land and supporting community services and facilities including a new primary school, local centre and formal and informal recreation. The opportunity for sustainable growth in this location has been promoted through the earlier stages of the preparation of the plan. Further commentary on the opportunity is provided in response to Question 8.	
	In our response to Question 3, we have argued for an increased level of housing provision to address potential shortfalls in delivery from the SUEs and to provide resilience in the plan through the provision of a reasonable buffer of additional housing sites. This additional provision should, in part, be directed towards the Loughborough Urban Area as the most sustainable urban centre in the district. Land at Riggets Green, represents a suitable, sustainable and deliverable option that should be included as a proposed allocation under Draft Policy LP 3.	
EDCLP/215 Lynette Swinburne Savills obo Trustees of the Garendon Estate	Within Table 3: Charnwood Proposed Settlement Hierarchy, Shepshed is identified as one of four Urban Settlements within the District. The Draft Plan defines Urban Settlements as follows: "A settlement that has a range and choice of services and facilities that meet the day to day needs of residents and physically or functionally forms part of a wider Leicester or Loughborough Urban Area."	Noted – support is welcomed.
	Our client supports the settlement hierarchy, and the inclusion of Shepshed as an Urban Settlement. The general approach in Table 4: Preferred Development Strategy 2019-36, for allocating growth to Urban Settlements after the Leicester Urban Edge and Loughborough is supported.	
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	The first issue to consider with the proposed Development Strategy is the make-up of the supply which is relied upon. This is particularly important in the draft Local Plan, where only approximately one third of future supply (7,252 dwellings from a total of 19,716) is to come from new allocations, with the remaining 12,464 comprising existing planning permissions and allocations. However, the evidence base supporting the consultation does not set out the detail behind this figure, so consultees cannot understand the sites comprising this supply or the assumptions	In preparing the next draft of the local plan, the Council will produce a housing trajectory and a more detailed account of the delivery expectations for the proposed allocations. Further housing market and housing need data is being prepared to inform the next stage of the local plan. The information in this response will be included in that further work.

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	which have been made about their deliverability or build-out rates. It is understood that this exercise will be completed ahead of the next round of consultation on a submission version of the Local Plan and we reserve the right to comment upon the trajectory when it is publicly available.	
	Some data is set out in the Council's most recent paper on 5-year housing land supply (as of 31 March 2019), but this relates only to sites with planning permission, and furthermore shows only their delivery for the 5-year period 2019 – 2024. No information is provided about assumed delivery beyond 2024, either in total or within the plan period. Furthermore, it is impossible to know which committed sites, if any, have been discounted or had their delivery delayed or build-out rates reduced, and what assumptions the Council are making about likely lapse rates for consents which are not implemented.	
	It is clear that two thirds of the Local Plan's housing supply cannot currently be considered to be either justified or effective, and significantly more detail is required as to how the total housing requirements are to be met, and the extent of additional allocations which the Local Plan needs to provide. Only once this has been established is it possible to consider the proposed distribution in a meaningful way.	
	Notwithstanding the above, we support the principle of focusing development on the Borough's largest settlements, which the Council's evidence has demonstrated are best placed to deliver the required quantum of development. In this regard Loughborough is particularly well placed to accommodate significant additional development, being the economic and social focus of the Borough, with the Housing Delivery Study (Dec 2017) concluding that the town's Market Absorption Capacity (MAC – the extent of housing which can be delivered without flooding the market and impacting upon viability) is High, stating:	
	"Submarket area offers highly convenient access to quality of life attractions (cultural, sports, leisure, and/or natural assets), and highly convenient access to employment, education and/or amenities. We have assumed that transport infrastructure capacity is currently good. These factors are not fully reflected in what are low average residential sales values in the submarket area (see	

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	commentary at Section 6.13)."	
	Considering the potential future MAC of Loughborough, the report states:	
	"In future, housing demand may increase in line with new employment opportunities at Loughborough Science and Enterprise Park. We have assumed that transport infrastructure would be improved in line with delivery. There may be some demand for a more aspirational housing offer relative to the current submarket area."	
	The proposed distribution of development fails to reflect the proposed development strategy however. In terms of new allocations only 1,945 homes are directed towards Loughborough together with the 4,412 existing planning permissions/allocations (the makeup of which requires further examination, as above). In comparison 2,074 new homes are directed to Shepshed in addition to the 830 existing planning permissions and allocations.	
	There is concern that the extent of these allocations do not take fully into account the quantum of housing which has already been delivered in Shepshed in recent years, with a significant number of developments approved and constructed (or at least commenced) in the town. This is reflected in the Housing Delivery Study, which concludes that Shepshed's MAC is only Moderate, indicating a lower capacity for the market to sustain additional growth when compared to Loughborough.	
	Furthermore, the draft Local Plan also states on p24 that the strategy has been informed by individual site assessments, so it is important that this strategy continues to be refined through the plan-making process, as further information and evidence about the deliverability of individual sites becomes available.	
EDCLP/217 Councillor Emma Ward Borough Councillor for Dishley &	Dishley & Hathern As a councillor for Dishley & Hathern, I have consulted with Hathern Parish Council to hear their views on the development planned for this area (Hathern specifically as nothing is planned development wise in Dishley). As I know the chair of Hathern Parish Council has pointed out, a number of new estates have	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures.
Hathern	increased the population of the village by 25% over recent years, and infrastructure is already under strain – Hathern Primary does	Impacts on the highway network have been considered through the Transport Modelling work and through the Sustainable Transport Study.

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	not have enough school places to accommodate the children of families who have moved into the village, and the local Doctor's surgery has also been put under pressure. Work is soon to begin on the Stonebow Village development, and this will undoubtedly further increase pressure on these services, as well as significant disruption to the A6 between Hathern and Loughborough, followed by a higher volume of traffic. Although only a small number of houses are planned for Hathern as part of the new Local Draft Plan, I can only suggest that Hathern has had their fair share of development over the last few and coming years.	The outcomes of this work will shape the final list of development sites that are proposed in the local plan. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	Loughborough Whilst I am in favour of converting former retail space into housing in the town centre (such as Carillon Court), space there is limited. Perhaps if so much student accommodation hadn't been developed in disused sites in the town centre we may have more sites available. I have concerns about the pressure on infrastructure in areas that have seen particularly high levels of development over the last few years, such as Shelthorpe and Shepshed. I also believe that the congestion in the town needs dealing with – the A6 from Kegworth to Loughborough and Epinal Way are particular problem areas. Underpasses or bridges over Epinal Way would help ease this, as often the problem is compounded by students halting traffic to cross between the University and the College campus.	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Charnwood in general I am disappointed that there are some areas that are being overloaded with developments (as already mentioned, Shelthorpe and Shepshed, for example), whilst others, which have land that could be utilised for new developments, are being left untouched (the Wolds villages and Cotes, for example). I note this is explained in the LDP as being because these areas have 'limited services and facilities'. Surely these could be developed? Development seems to be concentrated on one side of the borough, and infrastructure is not growing at a parallel rate. Access to schools, medical services and public transport are inadequate.	
EDCLP/218 Emma Holyoak	The settlement hierarchy seems to be incorrect. There is little justification as to why Cossington is as high as it is when put against the other villages in the category. Given the footprint of the village and the severe lack of facilities (1 pub and a playing field) it should be in the same lower Hamlet category as Cropston for	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger

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	example. Cropston actually has 2 pubs a playing field, playground, motor repair centre and a cricket club!There is nothing in the appraisal or the plan that sets out when the hierarchy was last updated or when it would be re-examined. Given that the housing distribution is predicated on this table being accurate and fair there is a due diligence piece here in getting it	urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
EDCLP/221 Nick Baker Lichfields on behalf of CEG	correct. CEG supports the preferred strategy of planning for a 'low growth' scenario whilst encouraging some additional housing supply to take account of changing circumstances. We agree that housing and employment growth should be focussed around the edge of Leicester. This approach appears to be based on evidence of need, whilst providing sufficient flexibility to maintain a supply of housing and employment land. The emerging local plan should do more to recognise and support the emerging role and function of the SUEs in meeting needs. CBC has established a growth strategy based on a small number of strategic locations in the adopted Core Strategy, so the emerging Local Plan should fully embrace and support the potential of these strategic sites to deliver comprehensive and sustainable development, with appropriate infrastructure provided alongside new homes, employment opportunities and services. This should include a recognition of the commercial considerations which may affect development decisions in some locations. As noted in our previous representations (April 2018), Table 3: Charnwood Proposed Settlement Hierarchy should recognise the emerging new settlements, including Thorpebury as an 'urban settlement'. The SUEs will be related to existing urban areas but will have a distinct character and function as sustainable settlements in their own right. The extent of Thorpebury is clearly defined in the approved parameter plans, and consequently the limit of Thorpebury as an emerging 'urban settlement' can be identified from approved Parameter Plan 1: Development Extent (attached). [PDF available]	The delivery of the SUEs (including Thorpebury) remain critical part of the development strategy for the borough. The Council is pleased with the progress on each of the SUEs, with sites gaining planning permission, and bringing greater certainty to the plan- making process. The Council expects to draft and agree a Statement of Common Ground with each of the promoters / developers of the SUEs to clarify progress and set out delivery expectations.
EDCLP/224 Paul Newton	The proposed scale of housing at Shepshed will overload the existing infrastructure and services (eg roads, health and social care, schools). Eg what will happen to congestion on Fairway Road, Leicester Road, Ashby Road, Tickow Lane, Anson Road, Belton Street, Hathern Road. I cannot see that the plan includes	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures.

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EDCLP/226 Eleanor Hood EDCLP/230 Barbara Fisher	 the necessary improvements and development of infrastructure and services to accompany the proposed housing. As such, the plan is not whole and coherent. Shepshed deserves a large decent supermarket – see my answer to Q20b. Developmental strategy. It is important to use brown field sites within towns rather than increased expansion. This will reduce costs with regard to extra infrastructure. 4.23 Baxter Gate/Pinfold Gate Development. No plans for a bus station in all of this. Why not? Essential if you wish people to make more use of public transport services that there is a coherent, accessible bus station/hub in the town centre. Town Centres and Retail – supporting retail. How? I know this is only a Draft Plan, but why even consider expanding retail into Baxter Gate and Pinfold Gate when there are so many empty shops in the town centre, Market Street and Church Gate, in Loughborough. 	Impacts on the highway network have been considered through the Transport Modelling work and through the Sustainable Transport Study. The outcomes of this work will shape the final list of development sites that are proposed in the local plan. Noted – Draft Policy LP1 sets out the requirements for making the efficient use of land, in particular, brownfield land. The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. Impacts on the highway network have been considered through the Transport Modelling work and through the Sustainable Transport Study. The outcomes of this work will shape the final list of development sites
		that are proposed in the local plan. It will also influence the necessary infrastructure that will need to be delivered to support growth. In line with the intention set out in Draft Policy LP33, this will include sustainable transport infrastructure.
EDCLP/246 Andrew Collis Gladman Developments Ltd	 Gladman is supportive of the proposed settlement hierarchy. The inclusion of Barrow upon Soar and Sileby as Service Centres within the settlement hierarchy is supported. Gladman agree that both settlements form some of the most sustainable locations for new development within the Borough beyond Loughborough, the urban edge of Leicester, and Shepshed. Both Barrow upon Soar and Sileby feature a wide range of services and facilities including a primary school, nursery, food store, doctor's surgery, dentist, pharmacy, and village hall/community centre. Both villages are located on the route of the half hourly bus service between Loughborough and Leicester, and benefit from direct hourly railway services to Loughborough, Leicester and Nottingham providing an alternative faster link to these settlements. Reflecting on the above, it represents a sound strategy for the Council to identify both within the Service Centre tier, with new development directed towards both settlements through subsequent policies of the Local Plan. 	 Noted – the support for the overall strategy is welcomed. The proposed growth figure stems from the Local Housing Need, which in turn is derived from the Standard Methodology. This represents the starting point for the growth strategy. In order to build flexibility into the development strategy, and help maintain a long-term supply of new housing, an additional 1,300 homes (over and above the Local Housing Need) are planned to be delivered across the plan period. The draft growth scenarios have been considered through the Sustainability Appraisal process; and it is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment.

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	Gladman also support the identification of East Goscote as an "other settlement". As illustrated by the Council's Settlement Hierarchy Assessment, East Goscote represents one of the more sustainable settlements listed as "other settlements" in the draft settlement hierarchy. The village features a Primary School, Post Office, Library, Pharmacy and Food Store. The village is also home to a fairly large employment area at its south west and is served by a highly regular bus services to Leicester (four buses per hour) and Melton Mowbray (Half hourly). East Goscote therefore represents a good opportunity at which to concentrate the growth needs of this tier to ensure that new housing can be accommodated sustainably.	
	Table 4 sets out the preferred distribution of housing growth. This confirms that growth is to be concentrated at the urban edge of Leicester and Loughborough, followed by Shepshed, the Service Centres and other settlements. Gladman support this strategy and consider this to reflect the key spatial influences of the Borough and the sustainability and capacity of these areas to absorb new development. The proposed spatial strategy ensures that new housing will be accommodated proportionately across the Borough, resulting in less pressure on infrastructure in any one area, promoting housing delivery through increased choice in location, and ensuring that the development needs and sustainability requirements of the Borough's rural settlements are responded to and safeguarded for the plan period.	
	As set out in our response to Question 3b, Gladman consider that there is a need for at least a further 1,437 dwellings to be accommodated through the Local Plan. This additional housing supply should be met proportionately, and according to capacity, amongst identified sustainable settlements of the borough focused first at proposed allocations. New settlements/broad locations for growth should also be identified in order to respond to longer term development needs as outlined through the Leicestershire Strategic Growth Plan (See Question 6 response below). The detail of these should be the subject of a focused plan review.	
EDCLP/254 Ian Deverell	<i>'Low Growth' Vs 'High Growth'</i> Charnwood's preferred spatial strategy is based upon a 'low	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of
Turley on behalf	growth' approach, with the draft Local Plan identifying that a 'High	the SHELAA, IDP, and SA. The Council is working directly with the
of Rainier Developments	Growth' approach was discounted as a result of "inadequate infrastructure" and "possibilities of being unable to maintain a five	statutory providers to understand the impacts of development and agree any necessary mitigation measures. An IDP is being prepared and will

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Ltd)	year housing land supply".	inform the next stage of the draft local plan.
	As set out further in response to Question 41a, Charnwood are yet to prepare an Infrastructure Delivery Plan (IDP) and so it is uncertain what evidence the Council are relying upon in their dismissal of a high growth strategy. Rainier are therefore concerned that the new Local Plan has arrived at a premature conclusion on housing need without due consideration of the unmet need arising from Leicester City and without the opportunity to appropriately consider the possibility of new development addressing constraints in existing infrastructure. Rainier contend that Charnwood should first prepare their IDP and then seek to identify a suitable level of housing need and spatial distribution which can anticipate and respond to long-term requirements and opportunities in line with NPPF para 22. Spatial Distribution The spatial strategy broadly reflects that which was previously adopted within the District, with an overreliance on strategic urban extensions. This strategy effectively rolls forward sites already allocated, some of which have been allocated for some time. These sites include: • North East Leicester Sustainable Urban Extension (SUE) for	 The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The SUEs benefit from planning permission, and reserved matters applications are progressing. This gives greater confidence and certainty to the development strategy. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure
	 3,325 dwellings; West of Loughborough SUE for 3,200 dwellings; North of Birstall SUE for 1,950 dwellings; Other consents for 3,949 dwellings; Saved 2004 allocation for 40 dwellings; Total of 14,464 dwellings 	that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
	With a clear focus on directing development to the PUA, this leaves a residual 5,930 dwellings to be found to meet the LHN starting point for the additional eight years beyond the adopted Local Plan end date (2028).	The Council acknowledges receipt of the submission for Sites to the east and west of Iveshead Road, Shepshed. The site will be assessed as part of the next stage of preparing the local plan.
	The existing Local Plan spatial strategy was ineffective in delivering the District's housing needs. This is exemplified by the continued allocation of a site for 40 dwellings saved from 2004 (some 15 years) despite no evidence being made available to demonstrate its deliverability. Also the fact that the Leicester North East SUE (and the wider PUA) has not delivered as expected, with the first	

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	reserved matters submission for the first phase of 600 dwellings being submitted to Charnwood in summer 2019 despite being allocated since 2015, this emphasises the significant time taken for sites of a strategic scale to begin delivering in Charnwood, and raises questions over the proposed spatial strategy which maintains the same approach as the Local Plan before it.	
	The new LP spatial strategy should therefore not continue the same failing spatial strategy of the adopted Local Plan, it should seek to move away from a PUA focus and adopt a more 'blended' approach which directs development to the most sustainable locations within the district. If the Council is to pursue a strategy including with a significant proportion of development being met through SUEs, it should consider whether it is more appropriate to allocate it for a smaller amount of growth in this plan period, and distribute the remainder to sites which are more likely to deliver in the short term to de-risk the spatial strategy.	
	In any event, Rainier are concerned with the Local Plan's strategy to distribute the residual housing requirement (taking account of all proposed site allocations) through the neighbourhood planning process. There is a lack of information available and limited guidance within the draft plan to demonstrate how the residual housing requirement would be split between settlements and there is no guidance on what happens to this residual housing need in the event that the neighbourhood planning process does not identify suitable sites for allocation.	
	NPPF paragraph 103 recognises that significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The new LP should therefore not restrict the scale of potential residential growth at settlements such as Shepshed. A greater level of growth at a site can deliver more significant infrastructure, such as improved bus services, and new health care facilities.	
	In this respect and in the context of Charnwood responding to the distinct housing shortfall arising from Leicester City, it is essential that the new LP seeks to deliver housing in the most sustainable locations, where it can maximise access to existing services and	

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	facilities. New market and affordable houses can maintain and enhance the vitality of rural communities and help existing services grow and thrive, as recognised by NPPF paragraph 78.	
	Given the level of services and facilities available in Shepshed, it is a location where growth should be focussed, and Rainier's sites to the east and west of Iveshead Road have the potential to deliver a significant level of growth in a highly sustainable location.	
EDCLP/255 lan Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	'Low Growth' Vs 'High Growth' Charnwood's preferred spatial strategy is based upon a 'low growth' approach, with the draft Local Plan identifying that a 'High Growth' approach was discounted as a result of " <i>inadequate</i> <i>infrastructure</i> " and " <i>possibilities of being unable to maintain a five</i> <i>year housing land supply</i> ".	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. An IDP is being prepared and will inform the next stage of the draft local plan.
	As set out further in response to Question 41a, Charnwood are yet to prepare an Infrastructure Delivery Plan (IDP) and so it is uncertain what evidence the Council are relying upon in their dismissal of a high growth strategy. Rainier are therefore concerned that the new Local Plan has arrived at a premature	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
	conclusion on housing need without due consideration of the unmet need arising from Leicester City and without the opportunity to appropriately consider the possibility of new development	Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	addressing constraints in existing infrastructure. Rainier contend that Charnwood should first prepare their IDP and	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	then seek to identify a suitable level of housing need and spatial distribution which can anticipate and respond to long-term requirements and opportunities in line with NPPF para 22.	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Spatial Distribution The spatial strategy broadly reflects that which was previously adopted within the District, with an overreliance on strategic urban extensions. This strategy effectively rolls forward sites already allocated, some of which have been allocated for some time.	The SUEs benefit from planning permission, and reserved matters applications are progressing. This gives greater confidence and certainty to the development strategy.
	These sites include: • North East Leicester Sustainable Urban Extension (SUE) for 3,325 dwellings; • West of Loughborough SUE for 3,200 dwellings;	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is
	 North of Birstall SUE for 1,950 dwellings; Other consents for 3,949 dwellings; 197 	address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed

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RESPONSE NO/ CONSULTEE	 Saved 2004 allocation for 40 dwellings; Total of 14,464 dwellings With a clear focus on directing development to the PUA, this leaves a residual 5,930 dwellings to be found to meet the LHN starting point for the additional eight years beyond the adopted Local Plan end date (2028). The existing Local Plan spatial strategy was ineffective in delivering the District's housing needs. This is exemplified by the continued allocation of a site for 40 dwellings saved from 2004 (some 15 years) despite no evidence being made available to demonstrate its deliverability. Also the fact that the Leicester North East SUE (and the wider PUA) has not delivered as expected, with the first reserved matters submission for the first phase of 600 dwellings being submitted to Charnwood in summer 2019 despite being allocated since 2015, this emphasises the significant time taken for sites of a strategic scale to begin delivering in Charnwood, and raises questions over the proposed spatial strategy which maintains the same approach as the Local Plan, it should seek to move away from a PUA focus and adopt a more 'blended' approach which directs development to the most sustainable locations within the district. If the Council is to pursue a strategy including with a significant proportion of development being met through SUEs, it should consider whether it is more appropriate to allocate it for a smaller amount of growth in this plan period, and distribute the remainder to sites which are more likely to deliver in the short term to de-risk the spatial strategy. In any event, Rainier are concerned with the Local Plan's strategy to distribute the residual housing requirement (taking account of all proposed site allocations) through the neighbourhood planning 	OFFICER RESPONSE Statements of Common Ground. The Council acknowledges receipt of the submission for the site South of East Road, Wymeswold. The site will be assessed as part of the next stage of preparing the local plan.
	process. There is a lack of information available and limited guidance within the draft plan to demonstrate how the residual housing requirement would be split between settlements and there is no guidance on what happens to this residual housing need in the event that the neighbourhood planning process does not identify suitable sites for allocation.	

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	NPPF paragraph 103 recognises that significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The new LP should therefore not restrict the scale of potential residential growth at settlements such as Wymeswold. A greater level of growth at a site can deliver more significant infrastructure, such as improved bus services, and new health care facilities.	
	In this respect and in the context of Charnwood responding to the distinct housing shortfall arising from Leicester City, it is essential that the new LP seeks to deliver housing in the most sustainable locations, where it can maximise access to existing services and facilities. New market and affordable houses can maintain and enhance the vitality of rural communities and help existing services grow and thrive, as recognised by NPPF paragraph 78.	
	Given the level of services and facilities available in Wymeswold, it is a location where growth should be focussed, and Rainier's site to the south of East Road has the potential to deliver a significant level of growth in a highly sustainable location.	
EDCLP/258 Sam Heaton Heaton Planning on behalf of	Heatons would agree with the general principles of the preferred development strategy. A dispersed pattern of residential development across the Borough would support the economic and social viability of smaller settlements. Similarly, there is lesser risk	Noted - The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
Swithland Homes Ltd	of significant public opposition attributed to a more dispersed pattern of development as opposed to fewer (but large-scale) Sustainable Urban Extensions across the Borough.	Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	The Company are positioned to offer bespoke housing solutions sympathetic to the requirements of each site on an individual basis. The high-quality developments produced by Swithland Homes would make an important positive contribution, where required, to	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	settlements across Charnwood in terms of design, form, and contribution to the character and functions of the surrounding landscape.	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/202 Planning and Design Group	GC No. 37 Limited (Godwin Developments) support the preferred development strategy, which aspires to direct growth to Shepshed as a defined Urban Area. New growth in Shepshed is required and supported in order attract inward investment, onbancing the vitality	Noted – support is welcomed.
(UK) Limited obo GC No 37 Limited	supported in order attract inward investment, enhancing the vitality and viability in the town. Housing delivery should be proportionate	

 contended that if the Council work proactively with landowners and developers, a new sustainable settlement could be delivered within a reasonable timeframe. Dependent upon the progress on the Local Plan, a new settlement would have a longer delivery rate but this would be benefricial for the longer-term needs of the Borough and it may insist in meeting housing need within the next Local Plan period. As outlined in response to question 3a, the Borough Council need to opt for a high growth strategy to ensure that the Local Plan has been prepared in line with the legal requirements, including the duty to cooperate and the test of 'soundness' contained within the Revised Framework (2019). The most appropriate strategy for delivering this growth in a sustainable way of meeting housing needs. Paragraph 72 of the Revised Framework (2019) states that new settlements and larger scale proposals can provide well-located and designed developments that are supported by the necessary infrastructure and facilities. 	RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
As set out in the proceeding response to Question 5, the delivery of	(Godwin Developments) EDCLP/201 Boyer Planning obo Knightwood	 is identified within the second tier of the settlement hierarchy and should be a focus for growth. The preferred settlement strategy has been defined by the Local Planning Authority as an 'urban concentration and intensification strategy with some growth dispersed to other areas of the Borough.' It is understood that previous consultation responses raised concerns that focusing development in too few areas would result in too much pressure being placed on existing infrastructure. We share this concern, however consider that appropriate growth within these areas can be achieved alongside the provision of a new settlement. The Council have set out that previous consultation responses raised concerns about the timescales and potential uncertainty associated with a new settlement. However, it is strongly contended that if the Council work proactively with landowners and developers, a new sustainable settlement could be delivered within a reasonable timeframe. Dependent upon the progress on the Local Plan, a new settlement could have a longer delivery rate but this would be beneficial for the longer-term needs of the Borough and it may insist in meeting housing need within the next Local Plan period. As outlined in response to question 3a, the Borough Council need to opt for a high growth strategy to ensure that the Local Plan has been prepared in line with the legal requirements, including the duty to cooperate and the test of 'soundness' contained within the Revised Framework (2019). The most appropriate strategy for delivering this growth in a sustainable manor would be to support development within existing settlements and promote a new settlement within the Borough. New settlements are strongly advocated by the Government as a sustainable way of meeting housing needs. Paragraph 72 of the Revised Framework (2019) states that new settlements and larger scale proposals can provide well-located and designed developments that are supported by the necessary infrastructure<	 intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were defined, three of which included the idea of new settlements. One further option defined the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Again, two out of the seven options included the idea of new settlements. Whilst appraising these options, the Council also developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects,

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	a new settlement can result in a number of benefits for the Borough and the local community. The Local Planning Authority need to take a positive and proactive approach by significantly boosting the supply of homes and meeting the longer terms needs of the Borough.	
	There are a number of examples which demonstrate how new settlements can successfully provide a long-term consistent supply of housing once the initial infrastructure has been delivered. Knightwood Trust Farms Limited have experience in developing new settlements and they were the landowner and promoter of Witham St Hughes whereby approximately 2,250 dwellings have planning permission on site and now half are complete.	
	In summary, we strongly support the growth of existing urban areas but consider that allocating a new settlement would provide significant benefits for the Borough and the local community.	
EDCLP/192 Severn Trent Water	Severn Trent understand the approach taken to identify the key area of development and do not foresee any issues with providing capacity for development within the plan period, provided that surface water is managed and discharged in a sustainable way, focusing on the use of infiltration and discharge to watercourse (Drainage Hierarchy Paragraph 80 Planning Practice Guidance), and that certainty of development is provided sufficiently ahead of development occurring.	Noted – the Council welcomes the opportunity to liaise with STW on the proposed allocations and the potential impacts on their infrastructure assets.
EDCLP/185 LRM Planning obo William Davis	 Development opportunities should be maximised in Loughborough. Consequently, a modest increase in the proportion of development should be directed towards Loughborough and specifically South Loughborough than proposed in Policy LP1. Loughborough has consistently been identified in successive development plan strategies as a focus for development on the basis that it is a sustainable location for new development. 	The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
	• Loughborough is rightfully afforded a primacy as the Borough's only urban centre. This is status is reflected in Table 3 of the Draft Local Plan. The settlement should therefore have the central role in meeting the Borough's development	Initially 10 high-level options were defined, three of which included the idea of new settlements. One further option defined the concept of a standalone new settlement.
	 requirements in the period up to 2036. Loughborough houses 36% of the Borough's population. In contrast, collectively the settlements of Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley and Sileby (the Service) 	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Again, two out of the seven options included the idea of new settlements. Whilst appraising these options, the Council also developed a 'Hybrid'
	201	

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	 Centres) house 23% of residents. It also has a significantly higher quantum of employment stock and consequently has a high level of self-containment and is indeed a net importer of labour. In contrast, the highest level of self-containment from the Service Centres is 9% (Sileby). Analysis demonstrates that around 1 in 5 economically active residents from Barrow upon Soar and Quorn and Mountsorrel Castle, and around 1 in 6 economically active residents from Mountsorrel and Sileby commute to Loughborough for employment purposes Such a strategy would ensure that homes are provided closest to where most jobs are likely to arise, where there is already a significant retail and leisure offer and where there is the greatest potential to secure increased public transport investment and usage. This approach is firmly based on sustainable development objectives, including those contained within the NPPF (paras. 103, 104 and 150 refer). Such a distribution of development was considered through the Sustainability Appraisal process Table 5 of the Settlement Hierarchy Assessment (2018) and was found to perform well. Indeed, the option was assessed as having 'significant positive effects' for addressing deprivation and for the local economy, with another potential significant positive effect for accessibility. As regards potential harm, to a large extent this is influenced by the individual sites chosen. For instance, taking landscape effects as an example, there remains the opportunity to accommodate additional housing growth to the south east of Loughborough in a manner that does not have adverse landscape and visual impacts. This area is considered to have a high capacity in landscape terms to accommodate development. This conclusion mirrors that presented within the accompanying Vision document and LVIA, which concluded that up to 1,000 dwellings could be accommodated in a landscape-led approach without significant landscape and visual harm. 	option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/182 Pegasus obo David Wilson Homes	 The Council's preferred (hybrid) development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements. The scale of growth for Shepshed, taking account of the levels of growth the settlement has already accommodated in recent 	The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and

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	 years, is not considered to be justified and does not therefore represent the most sustainable strategy for growth. For the smaller Other Settlements, some 800 homes are proposed, including a number of larger allocations at Cossington, East Goscote and Queniborough. This approach does not take advantage of the development opportunities available in the more sustainable Other Settlements, such as Queniborough. The development strategy should be reviewed to direct some additional growth towards the Other Settlements to provide for a more sustainable overall strategy. Queniborough is served by a range of services and facilities, including a primary school, convenience store, a butchers, two pubs/restaurants, a football club, village hall and scout hut, which meet the day to day needs of residents. Additionally, Queniborough performs well in terms of access to employment opportunities; both within Queniborough, as one of the more sustainable Other Settlements. David Wilson Homes has interests in land at Barkby Road, Queniborough (site reference: 316). The site can deliver approximately 150 new homes, including affordable housing, together with an area of public open space located centrally within the site, and along the route of the public right of way, as well as an area of children's play located to the south of the site, and a surface water attenuation pond located to the west. An outline planning application has previously been submitted (P/18/0309/2). Further comments on this opportunity are provided further below, under Question 8a. 	these were set against two growth scenarios. Initially 10 high-level options were defined, three of which included the idea of new settlements. One further option defined the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Again, two out of the seven options included the idea of new settlements. Whilst appraising these options, the Council also developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council acknowledge the submission of Land at Barkby Road, Queniborough. This site will be re-assessed and considered as part of the next draft of the local plan.
EDCLP/160 Persimmon Homes	• We agree with the development strategy proposed, which not only reflects the Strategic Growth Plan for Leicester and Leicestershire, but also can be accommodated by the settlements involved	Noted – support is welcomed.
EDCLP/253 Ann Irving	 So-called 'other settlements' are vulnerable and can quickly change to being unsustainable. As commuting has been made easier, as online ordering from conglomerates has become easier, the footfall in local shops, services and businesses cannot be guaranteed. Secondly, 18,000 new homes is such a huge rise. Where are the data to support this? The connection between new jobs and 	Noted – Other Settlements are identified to accommodate 5% of the proposed housing growth across the plan period. The local plan is required to provide for objectively assessed needs for housing. This figure stems from an assessment of Local Housing Need, which in turn is derived from the Standard Methodology. This represents the starting point for the growth strategy.

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	new homes has long since gone, as it has become so easy to commute quite long distances. Some of the housing numbers allocated to villages would seem to add to their local congestion issues and, with shopping habits already changing, do little for village sustainability. You have little control over bus services, so as people retire, villages could soon become unsustainable, and simply increase travel by car to access facilities and services. Some of this is already evident in my parish e.g. more jobs than workers, who have to commute in, traffic and parking problems, shops struggling to survive.	
EDCLP/247 Fisher German obo Mr S W Taylor and Mr P A Taylor	 The identification of Shepshed, as an 'Urban Settlement' (the second tier of the hierarchy) is supported. Shepshed is a sustainable settlement with a wide range of existing services, facilities and employment opportunities available within the settlement. It also benefits from a strong functional relationship with neighbouring Loughborough. Medium sized sites, such as this site for 174 dwellings, can deliver new homes quickly. Sites of this size attract a range of housebuilders and can from planning permission being granted, be built out within five years, immediately making a positive contribution to the Council's housing land supply. Strategic sites cannot deliver at this pace. 	Noted – support is welcomed.
EDCLP/ 244 Fisher German obo Rearsby Trust	 The identification of 'Other Settlements', which includes Rearsby, to deliver some of the Borough's need is supported. Settlements such as Rearsby are sustainable and can meet the day to day needs of residents. Rearsby has access to employment opportunities at Rearsby Business Park, access to a good bus service to Leicester via Thurmaston, and a Primary School. Development in settlements such as Rearsby will ensure that services such as the village Primary School are able to thrive and enable the Borough is able to meet its housing need over the Plan period. Small sites, in settlements such as Rearsby can deliver quickly. Sites of approximately 50 dwellings attract a range of housebuilders and can from planning being granted, be built out within two years, immediately making a positive contribution to the Councils housing land supply. Strategic sites cannot deliver at this pace. In addition, distribution of housing across the Settlement Hierarchy will provide flexibility and a choice of sites and is more likely to ensure that the housing needs are met over the Plan period, and that the needs of communities are 	Noted – support is welcomed.

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	 also met. The proposed strategy to not make any new provision for employment land over the Plan Period to 2036 is not supported. Rearsby Business Park is a thriving employment site and plays a modest but an important role in the local economy. Employment sites, such as Rearsby Business Park, need the opportunity and flexibility to expand to meet the needs of both the existing occupiers of the site and to meet the needs of new businesses. It is considered that additional land, adjacent to the Business Park should be allocated for employment uses, to provide flexibility and support the local economy in this area. Figure 3 below illustrates the land proposed for allocation for employment use. 	
EDCLP/239 Jonathon Barratt- Peacock	 Agree with urban development. Development in addition to that should be focused on new settlements to North East of Loughborough (e.g. Cotes/Wymeswold airfield). Regular bus routes already serve these locations. Smaller villages, hamlets and other settlements have been exempt from development for many years. These should be allocated a significant amount of development to help them to become viable communities and to protect what's left of the larger villages which have been severely overdeveloped in the last 10 years. There is absolutely no development proposed for the north east of Charnwood (e.g. Wolds villages). This needs to be addressed as these villages must be expected to share the burden of development. There are 14 Other Settlements but development is only planned in 5 of them. Please look at the other 9 and allocate some to them. The small villages and hamlets are not represented at all in this list. More development in the Service Centres. Investing in a more regular bus service would enable building to take place in many locations, particularly those to the North East of Charnwood. Cotes and Hoton are already served by a regular bus service so development could take place there without the need to improve this. 	 The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were defined, three of which included the idea of new settlements. One further option defined the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Again, two out of the seven options included the idea of new settlements. Whilst appraising these options, the Council also developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/239 Vivienne Barratt-	 I support urban growth, especially if empty building can be returned to use. 	The overall spatial strategy is one of urban concentration and intensification.

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Peacock	•	I would also favour a new settlement and growth in the 'Other settlements' and 'Small Villages/hamlets'. I consider that a new settlement near to Cotes or on Wymeswold airfield would be of great benefit to Charnwood as it would distribute development more evenly.	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
	•	The gap in population and housing stock between small villages and larger villages has been allowed to widen more and more. For example, Rothley's population has expanded by 40% since 2001, whereas Rearsby has only grown by 14% and Wymeswold by 20%. I would support allowing higher levels of	Initially 10 high-level options were defined, three of which included the idea of new settlements. One further option defined the concept of a standalone new settlement.
		growth in the smaller villages for a number of years to restore the balance and then using proportional representation after this.	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Again, two out of the seven options included the idea of new settlements.
	•	I have noticed that some of the details in the Settlement Hierarchy Assessment were incorrect, meaning that the proposals in this Local Plan are based on flawed information. For example, Wymeswold has 2 churches, 3 pubs, a very large	Whilst appraising these options, the Council also developed a 'Hybrid' option.
		modern Community Hall, a Scout Building, 2 parks, a cricket pitch and a bowling green. This means that it should score much higher in the assessment than it does. The omission of	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	•	these community assets from the assessment makes me query the reliability of the rest of the information that the assessment is based upon. At present, much development has been concentrated on the villages along the A6. These villages are suffering due to over 10 years of overdevelopment and lack of services (e.g education, roads, health services). On the other hand, the	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. An IDP is being prepared and will inform the next stage of the draft local plan.
		other settlements, smaller villages and hamlets have had very little development. This means that services to such villages are often not viable. If development were allowed in the smaller villages, they would be able to support a bus service, a shop etc.	Draft Policy LP1 identifies that the Areas of Local Separation are an important policy approach within Charnwood, and have been successful in focusing growth in more sustainable locations. The Area of Local Separation (ALS15 – Birstall/Rothley) and (ALS 3 – Mountsorrel/Rothley)
	•	The population in some communities (Walton, South Croxton, Thurcaston and Cropston and Barkby) is actually falling so sensitive developments in these locations may save these villages. If development is not allowed in the smaller villages and hamlets, these become affluent commuter villages as property is expensive and only people who have a car can afford to live there. The communities in such small villages are far less mixed in terms of socio economic background than they used to be. Instead, the social/affordable housing is all	remain as part of the local plan.

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	 concentrated in Loughborough, Shepshed and the Service Centres. Previously, each village/hamlet had a proportional number of Council houses built to accommodate those needing affordable homes. This maintained a balanced community. Because many of these home shave now been sold, new affordable homes need to be built in the smaller villages to allow them to cater for those who are not so affluent. Rothley has experienced significantly more growth and housing stock has increased by almost 70% since we moved here 13 years ago. Had we known that such development was going to be allowed, we would never have moved to Rothley. The high level of development and lack of services have made it a very different place to the one we initially chose for our home. The roads, schools and health care facilities cannot support the existing population. Despite the large increase in population in Rothley, there is still no GP surgery in Rothley and residents have to travel to Birstall, Mountsorrel and Quorn. Appointments are very hard to obtain. Rothley should not be classed as a Service Centre because it does not have healthcare facilities. I agree with the comments made by the inspector of the Core Strategy stating <i>There are commitments for around 3,500 homes in the Service Centres. This is sufficient to meet the levels of planned provision and we only expect to see small scale windfall developments within the settlement boundaries between 2014 and 2028. (4.45, Charnwood Local Plan 2011 - 2028 Core Strategy Adopted November 2015) –</i> I believe all remaining areas around Rothley should be protected and included as areas of separation. There is absolutely no development proposed for the north east of Charnwood (e.g. Wolds villages). This needs to be addressed as these villages must be expected to share the burden of development. There are 14 Other Settlements but development is only planned in 5 of them. Please look at the other 9 and allocate some to them. 	
	list. More development should be allocate in these locations to allow them to become viable communities again and to alleviate the overdevelopment in the Service Centres. Investing in a more regular bus service would enable building to take place in	
	many locations, particularly those to the North East of	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/195 Greg Hutton Davidsons Developments Ltd	 existing village. Conclusively, we consider it appropriate that the emerging Local Plan provide a greater focus on delivering an increased quantum of development in the 'Other Settlements' of the Borough through diversifying the location, size and type of sites selected. This will make a positive and material contribution towards assisting the Council achieve its aspiration of delivering 10% of new homes on small sites of 1ha or less and will ensure improved consistency in deliverability across the plan period. The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements. The scale of growth for Shepshed, taking account of the levels of growth the settlement has already accommodated in recent years, is not justified and does not represent the most sustainable strategy for growth. For the smaller Other Settlements, some 800 homes are proposed, including a larger allocation at East Goscote. The recognition of the sustainability of Queinborough through further proposed allocation is supported. Davidsons Developments has developed the highly successful housing site east of Barkby Road (Barley Fields). The development has provided attractive to house buyers and makes an attractive addition to the village. Queniborough is one of the more sustainable smaller settlements. The Council's Settlement Hierarchy Assessment, March 2018, identifies Queinborough as the third most sustainable Other Village just behind Hathern and Woodhouse Eaves, based on an assessment of services and facilities, access to employment and public transport accessibility. The assessment concludes that Queniborough has seven of the services and facilities and services, including key services of a food shop, primary school and high-speed broadband. There is also good access to employment and with frequent bus services connecting to Th	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council acknowledges receipt of the submission for the site south- east of its Barley Fields development off Barkby Road. Queniborough. The site will be assessed as part of the next stage of preparing the local plan.

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EDCLP/193 Richard Webb	 requirements. Further comments on the development opportunity are included in the response to Question 8a. I agree that the development strategy should be weighted towards the urban environment but think this could be more strongly weighted to protect the nature of the villages. I also agree that a settlement hierarchy should be used in classifying the many varied villages, towns and hamlets that Charnwood has. However I believe the settlement hierarchy is no longer valid and needs examining based on more accurate and up to date information. Potentially the selection criteria here too is flawed and should be part of the consultation process. 	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
EDCLP/204 Guy Longley Pegasus obo Davidsons Development Ltd (Rothley)	 The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements. The scale of growth for Shepshed, taking account of the levels of growth the settlement has already accommodated in recent years, is not justified and does not represent the most sustainable strategy for growth. There are also potential issues of market saturation with this scale of development, combined with development west of Loughborough, potentially slowing the delivery of housing in this location. For the smaller Other Settlements, some 800 homes are proposed, including a larger allocation at East Goscote. This approach does not make best use of the development opportunities available in the more sustainable Service Centre settlements to provide a more sustainable overall strategy. Davidsons Developments has interests in land south of Brookfield Road, Rothley (site reference PSH 400). The site provides the opportunity to provide some 80 new homes along with provision for a much-needed extension to Rothley C of E Primary School. Davidsons has been in ongoing discussions with Leicestershire County Council and the Head Teacher about these expansion needs. The expansion of the school to provide new classrooms and a hall, a relocated ball court and additional staff parking have been incorporated into the 	 The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council acknowledges receipt of the submission of additional information for the Land South of Brookfield Road, Rothley. The site will be assessed as part of the next stage of preparing the local plan. The Council notes the discussions between Davidsons Developments and Leicestershire County Council, and, in particular, reference to the expansion of Rothley C of E Primary School. This information will be used to inform the Council's own discussions with Leicestershire County Council.

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EDCLP/215 Lynette Swinburne Sa vills obo Trustees	 development proposals for the site. A Vision document for the site has been prepared and is included as part of these representations. As outlined above, the Council has not properly considered the need for school expansions in its development strategy, contrary to the requirement in the NPPF for local planning authorities to give great weight to the need to create, expand or alter schools through the preparation of plans. Further comments on the development opportunity south of Rothley are included in the response to Question 8a. Within Table 3: Charnwood Proposed Settlement Hierarchy, Shepshed is identified as one of four Urban Settlements within the District. The Draft Plan defines Urban Settlements as follows: "A settlement that has a range and choice of services and facilities that meet the day to day needs of residents and 	Noted – Support is welcomed.
	 Physically or functionally forms part of a wider Leicester or Loughborough Urban Area." Our client supports the settlement hierarchy, and the inclusion of Shepshed as an Urban Settlement. The general approach in Table 4: Preferred Development Strategy 2019-36, for allocating growth to Urban Settlements after the Leicester Urban Edge and Loughborough is supported. 	
DCLP 265 Silver Fox obo Ms J & Ms A Kimber	 The initial key question under this topic is - what is the make-up of the supply which is relied upon. This is vital to the draft Local Plan, where only approximately one third of future supply (7,252 dwellings from a total of 19,716) is to come from new allocations, with the remaining 12,464 comprising existing planning permissions and allocations. We note that the evidence base supporting the consultation fails to set out the detail behind this figure, so consultees cannot understand the sites comprising this supply or the assumptions which have been made about their deliverability or build-out rates. Data contained in the Council's 5-year housing land supply (as of 31 March 2019) only relates only to sites with planning permission. It reveals only their delivery for the 5-year period 2019 – 2024. No additional information is given regarding assumed delivery beyond 2024, either in total or within the plan period. It is impossible to know which sites, if any, have been discounted or had their delivery delayed or build-out rates reduced, and what assumptions the Council are making about likely lapse rates for consents which are not implemented. 	In preparing the next draft of the local plan, the Council will produce a housing trajectory and a more detailed account of the delivery expectations for the proposed allocations.

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EDCLP/151 Andrew Thomas Thomas Taylor Planning Ltd obo Mr W Murdoch	 In this regard there should be proper scrutiny of current allocations proposed to be retained; and if proposed to be retained they should be the subject of new policies within the emerging Local Plan, with clear evidence and justification given for their retention and accurate delivery rates that can be relied upon. Their contribution to meeting housing requirements in not insignificant and accordingly it would be inappropriate for them to be retained without further detailed scrutiny given it is around 6 years since their initial examination. It is clear that two thirds of the Local Plan's housing supply cannot be considered to be justified or effective, and significantly more detail is required as to how the total housing requirements are to be met, and the extent of additional allocations which the Local Plan needs to provide. Only once this has been established is it possible to consider the proposed distribution in a meaningful way. Notwithstanding the above, the principle of focusing development for new homes, in accord with the proposed spatial strategy, including Service Centres, which the Council's evidence has demonstrated are best placed to deliver the required quantum of development, is supported. The draft Local Plan notes page 24 that the strategy has been informed by individual site assessments. In this regard, it is important that this strategy continues to be refined through the plan-making process, as further information about individual sites becomes available. The draft Plan's Development Strategy and intention to distribute an element of housing provision throughout the Service Centres is supported. Furthermore, proposed Housing Allocation HS52 (Land adj. 84 Melton Road, Barrow upon Soar – see Figure 1 below) is supported. Proposed Housing Allocation HS52 lin Draft Policy LP3 amounts to approximately 0.8Ha (gross) although the net developable area is less reflecting the land occupied by the existing house. The development of t	Noted – support is welcomed

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	 Local Plan which contain a range of services and facilities. It would therefore be in accordance with the proposed Development Strategy. Number 84 Melton Road occupies a small gap between Seagrave Nurseries to the north and recent large-scale housing development immediately to the south that has recently taken place. Having regard to its surroundings, redevelopment of 84 Melton Road, together with its extensive curtilage and range of outbuildings would result in a sensitive "rounding off" on the eastern edge of the settlement. Proposed Housing Allocation HS52 would provide a smaller-scale development on previously developed land at the edge of the settlement which would be readily assimilated into the landscape and enclosed by neighbouring development to the north and south without causing any harm to the character or appearance of the area. As previously developed land, the site 	
	represents an area of the limited environmental or amenity value. The development of this site would be largely contained by existing natural boundaries including mature trees and hedges and would respect the shape and form of Barrow Upon Soar.	
DCLP 266 Leicester City Council	The City Council notes the intention carry forward Core Strategy policies relating to certain sites, including the North East of Leicester Sustainable Urban Extension. Specifically, the draft Plan proposes to save three policies from the Core Strategy (paragraphs 4.11 & 4.21) that deal with: - the North East of Leicester (NEOL) and - West of Loughborough SUEs - Loughborough Science and Enterprise Park The City Council would question the legitimacy of saving Core Strategy policies when proposing to adopt a full new local plan. With regard to the Thorpebury (NEOL) development it is essential to retain and protect the commitment to secure delivery of the transport infrastructure, in particular the strategic spine road through the development which is required to mitigate development	The Council considers that the draft local plan provides a policy framework to bring forward the SUEs and proposed major development sites across the borough.
DCLP 266	impacts in the city. The City Council notes that this paragraph [4.16] refers to evidence	Noted – the draft local plan references the demand analysis from the
Leicester City Council	of need totalling 55.9ha, comprising 11.4ha offices and 44.5ha industrial units and warehouses, but does not include 10ha contingency referred to later in the sentence.	HEDNA report. The next draft of the local plan will include the latest analysis of employment needs.
DCLP 266	The City Council notes that, on page 24, a reference is made to the 213	The figures set out on page 24 are an account of the appraisal

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Leicester City Council	development strategy including 2,000 homes to be directed to the edge of Leicester. However this appears to conflict with Table 4 (page 25) which shows, under the preferred distribution of new homes column, 1,567 attributed to Leicester Urban Edge.	undertaken via the SA work. The SA has considered a scale of growth which is greater than that currently proposed in the draft local plan. As such, the Hybrid option can be seen to have accounted for a greater set of impacts that is currently presented in the draft local plan.
DCLP 266 Leicester City Council	The City Council considers that the preferred strategy broadly aligns with the SGP and therefore supports this approach, subject to continued cross-boundary co-operation to address infrastructure and related issues associated with the growth of the wider urban area of the City. The Charnwood Local Plan should be flexible enough to support development of Leicester City's Local Plan and development needs to meet an increasing demand for services and facilities generated	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
	by a growing city, which may be exacerbated by the Charnwood Local Plan desire to concentrate development on the city's edge, such that where due to constraints these demands cannot be provided within the City they may be developed on the edge of Leicester, including in the Charnwood area. This would appear to support draft Policy LP1 whereby the overall spatial strategy is for urban concentration and intensification.	The Council looks forward to engaging with L.City to discuss common issues and agree a pragmatic way forward.
EDCLP/252 Leicestershire County Council	 Strongly welcome the emphasis on strategic sites in the 'right' locations; clearly expressed through saving the policies from the current Core Strategy regarding the North East of Leicester at Thurmaston SUE and west of Louqhborough SUE, and the draft Local Plan which contains updated policies for the north of Birstall (confirming as a SUE allocation), and the Watermead Regeneration Corridor (confirming as an allocation as a regeneration corridor to support the regeneration of Thurmaston, help meet the needs for jobs and maximise the potential of the Country Park). County Council strongly supports the development and further expansion of the Loughborough University Science and Enterprise Park, and note the continued support for this in the draft Local Plan, recognising the scope to be one of the largest science parks in the UK. Reference is made to the wider needs for larger strategic distribution units in Leicestershire and the current study being undertaken at a Housing Market Area level to ensure a combined approach is taken to address the needs of this sector. The County Council supports this approach and understands the results will inform the Pre-Submission Draft 	Noted – support is welcomed. The Council looks forward to engaging with LCC to draft and agree a Statement of Common Ground on key matters set out within the draft local plan.

 Plan. Charnwood Borough Council has reviewed existing employment commitments and considers these continue to 	
 [Strategic Property] will be substantial unmet needs within Leicester City which will need to be accommodated within neighbouring authorities; the distribution of which will be set out in a Statement of Common Ground (SOCG) to be agreed by all authorities across the HMA. It is therefore essential that the plan is flexible enough to take account of the both the unmet needs of the City and potential economic growth. It is therefore considered that the proposed allocation of 7252 homes be regarded as a minimum and that further consideration be given to increasing this allocation on the finalisation of the MoU. In relation to employment needs the strategy needs to address any potential areas of market failure particularly in relation to providing the ability for fledgling business to be established and 	of L.City's unmet housing figure. The Council will all which sits behind the headline figure to ensure derstanding of the unmet need. Ongoing discussions strategic policy-making authorities across the HMA) Co-operate will establish how the unmet need is n how to effectively plan for unmet need will be ate time, and formally confirmed through agreed on Ground. The sthat Draft Policy LP1 is sufficiently flexible to bring tes, of the right quality, in the right locations to ble development strategy. The submission of the Land at Farley Way, be considered through the SHELAA and will inform

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	 The Settlement Hierarchy is seen as sound and the distribution of new homes across the hierarchy as logical as it concentrates on larger urban sites that have the ability to deliver the infrastructure required to support the new communities. In addition, the allocation of housing to Service Centres is seen as essential to maintaining the sustainability of these communities. However, the allocation of specific sites removes the flexibility essential to good plan making by reducing the ability to bring forward sites on an opportunity basis to meet any shortfalls in supply. Further, the reliance on small sites to deliver 10% of the allocation is questioned as is their ability to deliver the infrastructure required to mitigate their impact on local services. The aspiration that development is of good design meets that of the Strategic Plan and Strategic Growth Plan and is therefore welcomed. To reiterate, with the exception of the three sustainable urban extensions (sites HS1 – HS3) the allocation of specific sites reduces the opportunity for other sites in sustainable locations to be brought forward to meet shortfalls in 5-year supply. In relation to its own land interests within Charnwood Borough the County Council would seek to promote the following housing site as a potential alternative to that proposed in Policy LP3: Land at Farley Way, Quorn – The Council owns 8 acres of land at Farley Way, Quorn situated to the west of the A6 Bypass adjoining existing development. Whilst, the land had previously been considered as being located within a flood risk area, exhaustive survey and technical appraisals have been undertaken in consultation with the Environment Agency which clearly demonstrate that the current flood map is flawed and that the development of the site is capable of contributing at least 48 new homes towards the housing needs of the village in a sustainable location more remote from the village centre and extends into the area of separation between Quorn and Loughbor	

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	provide confidence that the site provides a deliverable development option.	
DCLP/261 Edward Argar MP	 I have previously set out my concerns and opposition to the current plans for the A46 Expressway, and would strongly argue that the city of Leicester should absorb its full housing needs, and not reallocate any shortfall out to other areas in the county. I would also argue that 794 additional homes in 'other settlements' is too high. 	The Council continues to support the objectives of the SGP and is working with the other local authorities to establish how the aims can be delivered. The planning, costing, and delivery of sub-regional scale infrastructure (such as the A46 Expressway) will be determined via the SGP partnership and organisations such as Leicestershire County Council.
EDCLP/155 Gemma Yardley Blaby District Council	Blaby District Council is at the early stages of reviewing its own Local Plan and considering a wide range of issues some of which have the potential to require cross boundary discussions. We welcome the opportunity to continue to discuss such cross boundary matters	Noted – The Council looks forward to working with Blaby District Council to draft and agree a Statement of Common Ground on key matters.
EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	 The development strategy identified by the Council focussing new development in Loughborough and the edge of Leicester is agreed with. The provision of new homes within these areas will support these existing facilities whilst also providing opportunities to improve these and increase the range and availability of services to existing communities. This also reflects the Strategic Growth Plan for Leicester and Leicestershire (2018) which illustrates the A46 Priority Growth Corridor wrapping to the east and north east of Leicester. The identification of Syston as an Urban Settlement in the Council's Proposed Settlement Hierarchy is supported (Table3). 	Noted – support is welcomed. The Council continues to support the objectives of the SGP and is working with the other local authorities to establish how the aims can be delivered. The planning, costing, and delivery of sub-regional scale infrastructure (such as the A46 Expressway) will be determined via the SGP partnership and organisations such as Leicestershire County Council.
EDCLP/177 Sue Green House Builders Federation	 It is important that the spatial distribution of development meets the housing needs of both urban and rural communities (also see answer to Question 6 below). The 2019 NPPF states that "in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs" (para 77) and concludes that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services" (para 78). For rural communities, housing affordability can be acute. In Charnwood Borough, the median house price to median earnings ratio has more than doubled increasing from 3.19 in 1997 to 7.23 in 2018 however these Borough-wide 	Draft Policy LP1, Draft Policy LP4, Draft Policy LP5, and Draft Policy LP6 facilitate the delivery of a range of housing sites, in a range of locations, of the right type / quality / tenure to deliver the local housing needs for the borough.

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	 figures may disguise even more acute housing affordability in rural areas. Furthermore, all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council's focus should be ensuring that appropriate sites are allocated to meet the needs of specifically identified groups. The Local Plan should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations. 	
EDCLP/194 Guy Longley Pegasus on behalf of Hallam Land Management	 The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements. The scale of growth for Shepshed, taking account of the levels of growth the settlement has already accommodated in recent years, is not justified and does not represent the most sustainable strategy for growth. For the smaller Other Settlements, some 800 homes are proposed, including a number of larger allocations at Cossington, East Goscote and Queniborough. This approach does not make best use of the development opportunities available in the more sustainable Service Centre settlements including Sileby. The development strategy should be reviewed to re-direct growth towards the Service Centre settlements to provide a more sustainable overall strategy. Hallam Land Management has interests in land off Seagrave Road, Sileby that is a committed site with planning permission. There is scope for additional development on the site and this should be recognized in the plan. 	 The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council acknowledges receipt of the submission of additional information for the Land Off Seagrave Road, Sileby. The site will be assessed as part of the next stage of preparing the local plan.
EDCLP/199 Rob Foers Hinckley and Bosworth Borough Council	• The plan proposes an allocation for around 110 dwellings to the west of Anstey, some 300 metres from the boundary with Hinckley and Bosworth and around 1km from Groby. There are no other significant proposals set out in the plan close to the borough boundary with Hinckley and Bosworth. Nevertheless any proposals for development, regardless of proximity to Hinckley and Bosworth Borough should be planned alongside necessary infrastructure requirements to minimize any impact on the services and infrastructure within Hinckley and Bosworth.	Noted – the Council welcomes the opportunity to liaise with Hinckley and Bosworth on key matters, including housing sites and infrastructure provision. As part of these discussions, the Council would expect to draft and agree a Statement of Common Ground with Hinckley and Bosworth Borough Council.
EDCLP/252 Leicestershire	 In comparison to the existing core strategy, the proposed distribution of new homes in the draft local plan contains a 	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
County Council	 greater number of relatively smaller sites, more widely spatially distributed. It will be important for the local plan to have strong policies around the identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives. With regard to specific locations, the identification of Shepshed as forming part of the Strategic Growth Plan's "Leicestershire International Gateway" suggests that it will be necessary to revisit transport connectivity assumptions for this area. Notwithstanding growth being relatively more scattered than the existing core strategy, Charnwood Borough Council's transport evidence suggests that the draft Local Plan proposals are nonetheless likely to place considerable additional pressure on Loughborough's transport system, which will require a coordinated strategy for mitigation. Equally, the proposed concentration of further growth around the north and west edges of the Leicester Urban Area, when combined with growth within the City and Blaby District, means that a coordinated strategy will similarly be needed to develop and underpin delivery of transport mitigation measures in this area. Additionally, the proposed further growth in settlements in and around the Soar Valley is likely to put pressure on a highway network which is subject to significant resilience issues (i.e. regular flooding, limited cross-river connectivity). As above, this will need to be considered as part of strategies for mitigation in this area. 	the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. Impacts on the highway network are being considered through the Transport Modelling work and through the Sustainable Transport Study. This work is being prepared in conjunction with LCC. The outcomes of this work will shape the final list of development sites that are proposed in the local plan.
EDCLP/252 Leicestershire County Council	 Paragraph 3 [4.3] mentions protecting our most environmentally sensitive locations but perhaps should include the word 'enhance'-this reflects the ambition outlined in the Environment Bill. 	Noted – Draft Policy LP1 is clear that development proposals should conserve and enhance the built and natural environment.
EDCLP/252 Leicestershire County Council	 Last Sentence penultimate paragraph should read 'good natural environment' [Section 4 page 17]. 	Noted – any typographical errors will be corrected.
EDCLP/252 Leicestershire County Council	 Should Public Health not also be a consideration for the Development Strategy [page 24] 	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. This includes Public Health England.
EDCLP/252 Leicestershire	 Paragraph 1 the regeneration corridor should also support maximising the potential of other open space assets such as the 	Noted – Draft Policy LP37 provides a direct reference to Draft Policy LP21, which in turn sets out the strategy for the protection and

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County Council	Grand Union Canal and River Soar.	enhancement of the Gran Union Canal and the River Soar.
EDCLP/271 Lichfields on behalf of St Philips	 St Philips supports the preferred development distribution strategy and the way it allocates development to different parts of the Borough. In particular, St Philips supports the hybrid approach which focuses housing towards the urban areas but also proposes some growth to the Service Centres. We agree that directing some growth to the Service Centres 'improves the prospects for delivery' (paragraph 4.34); this is particularly given that 36% of proposed housing provision is to be directed to the Leicester Urban Area. The hybrid approach therefore recognises that lead-in times for the larger Sustainable Urban Extensions has the potential to restrict housing delivery early on in the plan period, and therefore to some extent decreases the reliance on the SUEs. 	Noted – support is welcomed.
EDCLP/273 Seagrave Parish Council	We have noticed that the classification of the type of village that Seagrave is, has changed from Small or Hamlet to Other Settlement. We understand that this change means that Seagrave is now considered suitable for small scale infill type development. We were a little concerned about this as we could not see any reason for this change. Seagrave does not appear to have gained any facilities since the production of the last plan. In fact, the bus service is now less frequent than it was when the original classification was made. We would be grateful if you could give this matter some consideration and let us know the reasons for this reclassification. We would ideally wish to request that it is put back to its original classification of Small Hamlet.	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
EDCLP/272 Centre for Sustainable Energy via Cllr Needham	 As above, the gradualist approach within policy LP1 is not equal to the scale and rate of change required, either by the climate science (summarised in the IPPC 1.5 degree report) or our legislative commitments around carbon reduction in the Climate Change Act. I've suggested wording to reflect the paradigm shift needed, which needs to flow through to all other policies. I've also suggested changed wording to sentence two to suggest a more equal balance between objectives to prioritise sustainable patterns of development and the protection of environmentally sensitive areas. It would be beneficial to clarify what is meant by "most environmentally sensitive areas". Does this mean areas which are sensitive in landscape and visual terms? 	 The Council welcomes the constructive and helpful comments on the draft local plan, and the proposed amendments to the policy wording. This response will be used to inform the next stage of the draft local plan. In considering any changes to policy wording it is important to reflect that any policy proposed in the local plan must be capable of being implemented and criteria within policies should not compromise the viability of future development. In terms of adapting to, and mitigating against, climate change, Draft Policy LP30 sets out a series of requirements for future development.

REPRESENTATION SUMMARY

Draft Policy LP1

Development Strategy

The overall spatial strategy for Charnwood, between 2019 and 2036, is urban concentration and intensification. <u>An environmentally sustainable pattern of</u> <u>development, consistent with a zero carbon future will be promoted, with</u> a balance between homes, jobs and facilities; and the most environmentally sensitive areas will be protected and the pattern of development will provide. We will support sustainable development within defined Limits to development and in the allocations defined in this plan. Development proposals will be supported which:

- minimise the need to travel, particularly by private car and <u>deliver</u> encourage the use of public transport, walking and cycling a significant modal shift to sustainable and active transport modes
- <u>Are zero carbon in use and contribute to mitigating and adapting to climate</u> change, <u>securing radical reductions in carbon emissions in line with the UK's</u> <u>carbon emission reduction commitments in the Climate Change Act (Net zero by</u> <u>2050);</u>

Suggested new bullet:

- Safeguard and deliver a net gain in biodiversity
- I'd also make the following additional comments:
- The environment section of this policy below concentrates overwhelmingly on landscape and visual impact and flooding suggesting these issues should be given preference over other environmental concerns. In directing development, weight should also be given to the protection of biodiversity and to climate change adaptation and mitigation.

Environment

Development will be directed to those locations of the least environmental or amenity value and to locations within the Borough at the lowest risk of flooding, applying the Sequential Test and if necessary, applying the Exception Test.

Development proposals should conserve and enhance the built and natural environment, in accordance with policies in this plan.

Areas designated as Countryside, Areas of Local Separation, Green Wedges and Charnwood Forest Regional Park are identified on the Policies Map. These designations are an integral part of the spatial strategy that has been identified to deliver growth in the context of the objective to conserve and protect the character of our towns and villages and the intrinsic character and beauty of the countryside. Development proposals which do not accord with Draft Policies LP18 Landscape, Countryside, Green Wedges and Areas of Local Separation and LP19 Charnwood Forest and National Forest will not be in accordance with the spatial strategy as set out in this policy.

We note that the majority of your housing need to 2036 is

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	 already committed through extant planning permissions. Given their scale, we would encourage these consents to be reviewed to see whether there is still scope for the council to require the inclusion of district heating networks within these sites, for example where bare outline consents have been granted. In general looking at the process of allocating development sites, we would encourage that specific consideration be given to whether allocated development sites are large enough and at a high enough density to make their connection to district heating systems economically viable and technically feasible, large enough to fund good quality strategic transport infrastructure, and well connected enough to enable non-car dependent lifestyles. Essentially the question could be asked: what scale of housing, density and use mix is needed to make district heating, the provision of good quality sustainable transport infrastructure and sustainable communities feasible and viable? Research and modelling would be necessary to provide an answer, but in general it suggests that the majority of development should be accommodated within fewer, larger allocations of mixed housing and employment, urban extensions and gardens towns. We have a new tool, Thermos (released for testing – introduction: https://www.thermosproject.eu/home/tool: https://tool.thermos-project.eu/login?redirect-to=/) which will semi-automate the process of designing and optimizing district heating networks for existing neighbourhood. We are also looking at applications. CSE may be able to help here in testing potential strategic allocations for their likely feasibility for district heating. We are in the process of developing a bid for another local authority to help them determine the lowest emission heating approaches suitable for different parts of their district heating. Please contact us if you would like more details. 	
EDCLP/274	• The proposed settlement hierarchy presented in Table 3 is	The evidence base for the draft local plan includes the Charnwood
Avisons obo	broadly similar to that in the adopted Core Strategy. The main	Settlement Hierarchy Assessment (March 2018). This work analyses the

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Jelsons	 difference being that Syston has been elevated into the 'urban settlement' category. Jelson's supports the Council's proposed settlement hierarchy and in particular that Syston is now classed as an Urban Settlement. Insofar as the Development Strategy is concerned, the Preferred Options paper confirms that the Authority anticipates the vast majority of housing and employment growth being focussed at the edge of Leicester City, managed growth within and adjacent to Loughborough and some growth to Shepshed and smaller scale growth of the Service Centre and Other Settlements. Jelson broadly support the principle of the Settlement Hierarchy and in particular that Loughborough is the preferred focus for growth after the Leicester Urban Edge. However, it does have concerns about whether there is sufficient capacity within Shepshed to accommodate the additional 2,041 dwellings that the Authority intends to allocate to it over the Plan period. In addition, our Client is concerned about the approach that the Authority has taken to assessing the 'sustainability' of some of the lower order settlements. This appears to be based purely upon the range of services, facilities and employment opportunities that are available within a particular settlement. However, in Jelson's view settlement sustainability needs to be looked at in the round. For example, it needs to be needs and Rearsby have limited services and facilities provision themselves, they are nevertheless extremely well related geographically to Loughborough (in the case of Burton) and East Goscote (Rearsby) and therefore are able to benefit from the wider range of services, facilities and employment opportunities available within these higher order settlements. Moreover, local residents would be able to use existing public transports evices to make these journeys where necessary. The NPPF is clear that the planning system should deliver a wide choice of high quality homes. As a consequence, any strategy that focuses deve	role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	should in Jelson' view, evenly distribute a greater proportion of housing across the Borough, based on a comprehensive assessment of settlement sustainability / capacity, with priority being given to: Service Centres as these locations are likely to represent the most sustainable development options; and, lower order settlements / villages that are located a short distance away from higher order settlements and which can therefore take benefit from the wide range of services and facilities available in the larger settlement – for example Burton on the Wolds which is located close to Loughborough; and, c) growth in lower order settlements / villages, proportionate to the size of the settlement so as to meet the needs of rural communities thereby helping those places to grow and thrive in accordance with the NPPF.	
EDCLP/275 Define obo William Davis	 To address the aforementioned risk, housing delivery from small-medium sites that are suitable, available and achievable is critical in building a portfolio of housing types and sizes in order both to meet CBC's housing requirements to 2036, and to maintain a rolling five-year supply of deliverable housing. Given that the lead in times from planning to housing delivery on smaller sites is significantly shorter than that of larger developments, small-medium sites would fall into the schedule of deliverable supply immediately, thereby contributing immediately towards CBC's supply of deliverable housing required to meet the Borough's housing need. This is reflected within NPPF paragraph 68 that highlights the merit of such sites. WDL appreciates CBC's concerns that further large-scale growth may not be able to accommodated therefore it is suggested that further development should be accommodated within those 'Other Settlements' where there is sufficient pre-existing infrastructure to accommodate growth, or where development could clearly assist in the maintenance and enhancement of services and facilities. Specifically, development at sustainable settlements such as Burton on the Wolds would provide additional flexibility within CBC's housing land supply portfolio in a location that is sustainable and suitable. It is WDL's contention that the Settlement of Burton on the Wolds and its potential, therefore, to 	The draft local plan provides for a balanced portfolio of large-scale and small-scale sites to be developed over the plan period. This is to cater to the different market conditions across the borough, and to allow for different landowners and developers to progress a variety of schemes that meet local housing needs. The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood. This response will be used as an input to the next draft of the local plan.

 accommodate further development and thus enhance this further. This assessment fails to consider other merits of Burton on the Wolds as a settlement and the opportunities that exist to enhance existing facilities and infrastructure that have a good baseline. The assessment overlooks the opportunity to enhance the existing transport services available in the settlement in order to establish a good transport link between the settlement and the main urban centre of Loughborough. Burton on the Wolds' 'Limited' SHA score is, therefore, hampered by the frequency of public transport services, rather than the speed and distance. That is, the SHA criteria indicates that a frequency of 30 minutes for bus or train services to a main 	RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
 urban centre is required for such services to be considered 'Good.' However, as NPPF paragraph 78 reflects, residential development in smaller, rural settlements can enhance the vitality of rural communities, with development able to support or enhance services in groups of vilages. That is the case here, whereby a commitment to residential development within the settlement would naturally create a higher demand for more frequent transport services. Thus, residential development within Burton on the Wolds would likely enhance Higher Order Service Access to a 'Good' level. In turn, the settlement would also achieve a 'Good' Employment Access due to its enhanced connection with Loughborough. This would also be supplemented by the existing Wymeswold Industrial Park that is located within 10 minutes walking distance from the proposed site and the settlement's relative proximity to the employment opportunities at Barrow upon Soar. This significant enhancement to transport and employment infrastructure and services can only be achieved, however, through a commitment to residential development in Burton on the Wolds. The SHA also fails to capture the settlement's pre-existing retail offer, paricularly with regards to a Food Shop. Again, a Food Shop exists, in the form of the Wolds Garage, but is not yet open 7 days a week for the equivalent of a weekly shop. However, the Wolds Surger on on the Wolds to enable ti to provide for a wider range of convenience goods is supported.'' As such, it is again evident that residential 		 further. This assessment fails to consider other merits of Burton on the Wolds as a settlement and the opportunities that exist to enhance existing facilities and infrastructure that have a good baseline. The assessment overlooks the opportunity to enhance the existing transport services available in the settlement in order to establish a good transport link between the settlement and the main urban centre of Loughborough. Burton on the Wolds' 'Limited' SHA score is, therefore, hampered by the frequency of public transport services, rather than the speed and distance. That is, the SHA criteria indicates that a frequency of 30 minutes for bus or train services to a main urban centre is required for such services to be considered 'Good.' However, as NPPF paragraph 78 reflects, residential development in smaller, rural settlements can enhance the vitality of rural communities, with development able to support or enhance services in groups of villages. That is the case here, whereby a commitment to residential development within the settlement would naturally create a higher demand for more frequent transport services. Thus, residential development within Burton on the Wolds would likely enhance Higher Order Service Access to a 'Good' level. In turn, the settlement would also achieve a 'Good' Employment Access due to its enhanced connection with Loughborough. This would also be supplemented by the existing Wymeswold Industrial Park that is located within 10 minutes walking distance from the proposed site and the settlement's relative proximity to the employment to residential development in Burton on the Wolds. The SHA also fails to capture the settlement's pre-existing retail offer, particularly with regards to a Food Shop. Again, a Food Shop exists, in the form of the Wolds Garage, but is not yet open 7 days a week for the equivalent of a weekly shop. However, the Wolds Submission Neighbourhood Plan (WSNP) Policy WV11: Village Shop outlines an aspiration for "the extension of t	

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	 development within the settlement can enhance preexisting services and facilities to promote the self-sufficiency and sustainability of the settlement, in accordance with paragraph 78 of the NPPF. Furthermore, WSNP Policy WV12: Infrastructure indicates that new housing development would also fund the provision of additional school places and additional community meeting space as a result of developer contributions. 	
EDCLP/276 Pegasus obo Wilson Enterprises	 The Council's preferred hybrid development strategy involves an additional 2,000 homes on the edge of Leicester, 2,000 homes at Shepshed, 1,000 homes at Service Centres and 800 homes directed towards Other Settlements. The strategy to focus growth on the edge of Leicester is supported. We have referred to the need for the Council to consider pursuing a medium-growth strategy and to make provision for a greater flexibility allowance through the inclusion of additional sites in the plan. In allocating further sites, the Council should look at the opportunities for the allocation of further sites in sustainable locations adjoining Leicester. Land to the east of Thurcaston provides an opportunity to provide for further growth in a sustainable location on the edge of Leicester. 	 The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/277 RPS obo Bellway Homes	 Whilst we do not object to the proposed spatial strategy and have no issue with a dispersed pattern of development, we do consider that a greater proportion of smaller sites should be developed, to provide flexibility and support growth, by enabling developments to come forward over the entirety of the plan period up to 2036. This will meet the needs of both urban and rural communities, and allow for a buffer to be incorporated within the housing allocations to take account of the possibility of non-delivery of any extant permissions, and the potential for delay in the delivery of some of the strategic allocations. It also allows for adjustments to the Council's assumptions on lapse rates, windfall allowances, delivery rates and/or if any of the proposed site allocations are found to be unsound. As 	The Council acknowledges receipt of the submission of additional information for Land to the east of Thurcaston. The site will be assessed as part of the next stage of preparing the local plan. The draft local plan provides for a balanced portfolio of large-scale and small-scale sites to be developed over the plan period. This is to cater to the different market conditions across the borough, and to allow for different landowners and developers to progress a variety of schemes that meet local housing needs. The Council acknowledges receipt of the submission of additional information for the promoter's site at Thurmaston, and the revised proposal for HS16. These will be assessed as part of the next stage of preparing the local plan.

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	outlined previously, the smaller the contingency becomes, the lesser the flexibility of the plan, therefore a sufficient contingency is embedded within the high growth option which	
	 should be applied. Based on this, the Council's Strategy should consider incorporating a greater number of unconstrained smaller scale 	
	non-strategic sites in sustainable locations, to avoid delivery issues with the current Core Strategy. As set out in the Second	
	Interim SA, there are a number of suitable, available and deliverable sites including Bellway's site at Thurmaston, which could also include the land to the north adjacent to Syston, that	
	are favourable against the Second Interim SA's assessment criteria, and would lead to an appropriate pattern of housing	
	growth. This approach provides for and is complimentary to the Council's higher level of growth proposed.These sites by their very nature are less constrained, in	
	sustainable locations with direct and good access, and as such are better able to provide for early delivery whilst the SUEs will	
	inevitably take their time in progressing through the system. It also means that the Council are able to supply for the widest possible range of sites, by size and market location on suitable	
	land, to ensure the best possible range of products and maximum delivery. In this way, a good mix of sites can provide	
	choice for purchasers and allow for places to grow in a sustainable manner and create opportunities to diversify the construction sector.	
	 In addition to this, to ensure that the proposed draft allocation site HS16 makes effective use of land, a larger area/context for the site should be considered (see Appendix 2 showing the 	
	additional deliverable land parcel on the edge of Syston). This will allow for a well-designed development that is not only	
	respectful of the surrounding landscape character and environment but also retains an agreed amount of separation between the two settlements, and applies an appropriate	
	mitigation strategy. This will help to strengthen each settlement's distinctive character, retain and enhance local	
	landscape (not considered to be of high landscape value), and design for appropriate densities within that locality.	The droft least plan provides for a belanced particlic of large acate and
EDCLP/278 Savills obo Mr and Mrs Grainger	• Our principal issue is the implementation of the spatial strategy. We have significant concerns over the inflexible, rigid approach to accommodating housing in rural areas and would make the	The draft local plan provides for a balanced portfolio of large-scale and small-scale sites to be developed over the plan period. This is to cater to the different market conditions across the borough, and to allow for

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	 following points and recommendations in the interests of a sound local plan. Firstly, these representations should also be read in the context of a national drive to encourage small and medium sized housebuilders (SMEs) and as a means to ease the current housing crisis and dominance of larger developers. The need is further highlighted through, paragraph 1.29 of the February 2017 White Paper (titled 'Supporting small and medium sized sites, and thriving rural communities') states: "Policies in plans should allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector. Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive.' At present, there is reference in the text at paragraph 4.36, however this does not go far enough. With only 23 homes allocated in other villages – the locations which are likely to make up this supply the policy and aspiration is largely ineffective. Paragraph 68 of the Revised NPPF is clear. This states that local authorities should accommodate at least 10% of their housing requirement on SME sites. This 10% need is not effectively met, however ensuring a positive, flexible approach to rounding off settlement boundaries in small villages would achieve this. Recommendation 2: Create an additional policy confirming how the 10% requirement will be met in smaller villages. In the interests of planning which is compliant with the NPPF. 	different landowners and developers to progress a variety of schemes that meet local housing needs. Notwithstanding, the Council will review the policy framework for small sites in light of this consultation response. Where appropriate and necessary revisions to the policy framework may be made as part of the next draft of the local plan.
DCLP/61 Mr I Relf	 Thank you for your reply to my letter to the Leader of Charnwood Borough Council. I have made my concerns known to the Police Commissioner, Lord Willy Bach. However, you have managed to 'pass-the-buck' very conveniently and have ignored my comments about Shepshed being a dumping ground for Loughborough and other Councils overspill population. I note, from the Shepshed and Hathern Community Eye, that there is a planning application for 210 dwellings on land off Ashby Road West. Shepshed appears to be the preferred dumping ground for much of Charnwood's housing. 	 The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.

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	 I would be good if the NIMBY councillors, who live in the Wymeswold/Burton-on-the-Wolds and Cossington areas, thought about modest development throughout the Borough, instead of overloading Shepshed, continually. Not only is there problems with road access but also destruction of natural habitat, flooding and a lack of increase in appropriate infrastructure, including school provision, health provision and other amenities. Thank you for your very informative letter in response to the one from me, received on the 18th February, by you. The Table of Settlement proved most illuminating, especially the explanation of Service Centres and 'other settlements.' The figures for Loughborough and Shepshed are most interesting. If, as I suspect, the figure for Loughborough includes the Garendon Development, then there has been a very clever manipulation of data. Garendon, has historically, always been part of Shepshed – it is only the coming of the M1 in the sixties that gives the illusion that it is of Loughborough. That, of course, confirms any argument that Shepshed, has for several decades, been Charnwood Borough Council's dumping ground – probably longer! Please would you forward all my correspondence to the consultation on the draft Charnwood Local Plan. 	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. An IDP is being prepared and will inform the next stage of the draft local plan.
	think we can best achieve our aspiration of delivering 10% of new	
DCLP/17 Dr Catharine Ferraby	To be honest this looks like cramming houses in wherever possible. Garden grabbing, selling off public amenities.	Noted – The proposal for 10% of new homes to be delivered on small sites is underpinned by the intention set out in Paragraph 68 of the NPPF.
DCLP/27 Ms Suzanne Collington	Using the neighbourhood plans and building on brownfield sites only.	The Council expects to make effective use of NPs and brownfield land, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare.
DCLP/85 Mr Dennis Marchant	To publicise in the communities that smaller packages of land are required for new home development and encourage and assist site owners to come forward. Often the smaller packages are in the ownership of older family members who do not realise that there is a need for their land. In addition, Town and Parish councils could be asked to suggest sites using their local knowledge.	Noted – the Council welcomes this proactive suggestion. Ensuring there are transparent mechanisms in place to document, track, and deliver this proposal would be something that the Council would need to work closely with Town and Parish Councils to adopt. But, subject to the correct terms of reference and operating protocols being in place, could generate a response.
DCLP/186	The Quorn Neighbourhood Plan (QNP) does have a policy covering	This response will be used to inform the next draft of the local plan. Noted – the Council would support this proposal, subject to the process

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Quorndon Parish Council	'Windfall Development' so QPC would support a publicity campaign notifying that smaller packages of land are required for new home development and encourage and assist site owners to come forward. The QPC would be prepared to assist in suggesting possible sites using their local knowledge of the Parish.	being transparent and capable of being reviewed / audited for probity reasons, where necessary.
DCLP/218 Professor David Infield	These smaller developments should be restricted to brown field sites so as to avoid loss of open green space.	The Council expects to make effective use brownfield land, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare.
DCLP/227 Mr Gideon Cumming	With the prospective change in the way people shop and the prevalence of empty shops the council should consider the possibility of repurposing some existing spaces as residential dwellings. This would have a two-fold benefit of removing empty shops and increasing the demand for town centre shopping from the new residents. It would also generate a body of residents within the town centre who are keen to see the improvement of their immediate environment. When considering the reuse of existing buildings within the town centre, especially those of an historic nature, the council should seek to preserve any remaining vestiges of the historic architecture.	Noted – the Council expects to see a number of residential proposals to emerge in town centres / district centres as the traditional high street evolves.
DCLP/309 Dr Satbir Jassal	When viewing proposals of developing on small sites particularly with a view of the smaller villages and hamlets we would like the council to consider the following issues. The infrastructure of existing smaller villages and hamlets need to be able to cope with any new builds particularly in terms of transport and facilities such as mains and gas. In addition the builds should not overwhelm the size and existing communities. The housing should be appropriate for the historical style and structure of the settlements.	Noted – the sites in question would be of one hectare or less, and so are not anticipated to have significant impacts on infrastructure. The Council is preparing an IDP, which will account for the infrastructural needs and demands across the borough.
DCLP/327 Mrs Alison Lawton-Devine	Look to develop brownfield sites, or regenerate disused buildings into flats and low cost homes.	The Council expects to make effective use of brownfield land, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare.
DCLP/336 Sturdee Poultry Farms Ltd (Mr John Wheeler)	Government policy in paragraph 68 is straightforward: the development plan and brownfield register need to accommodate at least 10% of the housing requirement on sites of 1ha or smaller. The plan needs to be transparent and include the site size of its allocations and include the sites from the brownfield register that it is intended should contribute to this requirement. As it stands, only 489 dwellings are allocated on small sites which is well short of the 725 minimum.	Noted – the Council expects to comply with Paragraph 68 of the NPPF, including the potential to not provide land to accommodate 10%, if and where it might be shown that there are strong reasons why this target cannot be achieved.
DCLP/349 Mr John Barton	Yes. But note it is too easy for small-scale planning applications to get beaten to a stand-still by the cost of bureaucracy. Just get and build houses.	Noted – the draft local plan provides a policy framework to meet the objectively assessed needs of the borough.

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DCLP/390 Dr Martin Field	Prioritise the means for local communities to steer the shape and tenure of small settlements to meet housing needs identified by local and objective Housing Needs Assessments - through community-led projects, exception site developments and other similar approaches.	Noted – the Council supports communities preparing local housing needs assessments to better understand the need in their local area. Community-led projects, sites identified through Neighbourhood Planning, and rural exceptions sites are expected to deliver a significant
LDCLP/02 Anonymous	No more affordable housing	amount of small-scale residential development. Noted – affordable housing is a fundamental component of the future supply of housing – helping the Council meet the full range of housing needs across the borough.
LDCLP/15 Anonymous	Use brownfield sites	The Council expects to make effective use of brownfield land, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare.
LDCLP/22 Anonymous	I think this is a good aspiration – using land in towns & cities that isn't currently used is the best approach. Eg derelict and unused factories, shops, should be demolished & the land used for housing.	Noted - the Council expects to make effective use of brownfield land, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare.
LDCLP/34 Anonymous	Location in the Charnwood villages appears to be part of such placement.	Noted – small sites are expected to be delivered across the borough in accordance with the development strategy set out in Draft Policy LP1.
LDCLP/51 Anonymous	Look at land that is derelict/abandoned and under used first.	Noted - the Council expects to make effective use of brownfield land, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare.
EDCLP/34 Cllr Mary Draycott	This could apply to the building of social housing. There are a number of small sites that could be utilised for its building. It does need to be across the Borough.	Noted – small sites are expected to be delivered across the borough in accordance with the development strategy set out in Draft Policy LP1.
EDCLP/55 Sileby Parish Council	Sileby Parish Council consider that greater recognition should be given to enabling the conver and re-use of existing buildings and the redevelopment of previously developed land on small s outside Limits to Development - but only where such sites are reasonably well-related to Ser Centre settlements or higher in the settlement hierarchy. A policy should be developed which would enable this and would also compliment Policy LP16 wh encourages the growth and expansion of businesses in rural areas. (Also refer to detailed comme	 ^{sic}The Council expects to make effective use of NPs and brownfield land, ^{site}vicbut it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare. ^{site}nt:
	attached) Sileby Parish Council would suggest that the responsibility for identifying small sites (less 1Ha in size) should be delegated to those communities preparing neighbourhood plans. Sites of below 1 hectare should not be considered to be strategic in nature. Neighbourho	00
	plans were established through the Localism Act to enable local communities to help sha future development within their areas. Enabling neighbourhood plan areas to identify sm sites across the Borough will demonstrate that the Borough Council recognise the role th	hal

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	neighbourhood plans should be taking. This approach will necessitate the local plan including targets for neighbourhood areas as suggested above by Sileby Parish Council. Fo those areas not preparing neighbourhood plans the Borough Council could either prepare small sites allocations document or else encourage such developments through the inclusio of criteria based policies.	a
	Sileby Parish Council also consider that greater recognition should be given to enabling the conversion and re-use of existing buildings and the redevelopment of previously developed land on small sites outside Limits to Development - but only where such sites are reasonab well-related to Service Centre settlements or higher in the settlement hierarchy. A policy should be developed which would enable this and would also compliment Policy LP16 whice encourages the growth and expansion of businesses in rural areas. A mix of homes will be needed to accommodate differing life-styles and the conversion and more intensive re-use existing houses, commercial and business properties for smaller households (such as students, single-persons and the elderly) will all have a role to play and contribute to overall housing delivery. Within the urban area and more densely developed higher-order settlements these forms of development are more likely to take place on smaller sites of 1H or less and the contribution these make to the overall supply of homes should be encouraged explicitly provided for through positive policies and monitored.	i ly o
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	 These are sites suitable for small local house-builders and should be encouraged. Over the plan period many opportunities should come forward including: Redevelopment sites within the main towns and service centre settlements; Infill and small edge of village sites in the smaller settlements – this may require some flexibility in the determination of settlement boundaries and the extent to which sites outside settlement boundaries are well related to that settlement; Redevelopment of redundant barn complexes in the countryside – this will require a more pragmatic and flexible approach to the redevelopment of barns on what is termed agricultural land in the NPPF and where Prior Approval Class Q for the conversion of barns is not a suitable route. 	Noted – the Council welcomes the suggestions and will consider these opportunities in preparing the next draft of the local plan
EDCLP/74 Mr Hussain	See above (Q4), the same strategy applies in the preservation of time-binding energies & home life efficiencies & in compliance with an acceptable & positive form of human engineering that intrinsically develops a healthier mind-set for better collaboration in respect of community bonding and community cohesion.	Noted – meeting the needs of the local community is the primary role of the local plan.
EDCLP/108 Sue Barry	Smaller development better than large ones on brownfield sites, replacing buildings. Rothley the William Davis development 250 houses built so far	Noted - the Council expects to make effective use of brownfield land, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare.

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	 which was original plan. Object to additional 39 houses in new proposal as not part of original 250 on this site. Rothley does not have infrastructure for additional housing. Large developments look like Fort Knox with all the fences and so many trees being taken down takes ages for them to be replaced Junction 23 area horrendous !! 	
EDCLP/121 Marie Birkinshaw	Again it is important to see whether these sites are the last remaining refuges for nature and how they relate to green corridors before final building decisions are made. Also keep in mind that all people in the Borough should live within 10 minutes' walk of a green space as an ideal aim.	Noted – small sites are expected to be delivered across the borough in accordance with the development strategy set out in Draft Policy LP1.
EDCLP/125 Tim Birkinshaw	As long as most of the small sites are within urban settlements (and do not encroach on industrial and commercial uses) this should help to make settlements more compact, and should help increase sustainability. Working with small building companies and housing associations may help. Could Charnwood use small sites to increase its stock of council houses? It may be too ambitious but should be tried.	Noted – small sites are expected to be delivered across the borough in accordance with the development strategy set out in Draft Policy LP1.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	The Council needs to adopt a proactive approach to bringing potential sites forward and working with partners. Identification of suitable sites, particularly in 'other settlements', through Neighbourhood Plans should be encouraged and Rural Exception sites for affordable homes should be actively promoted. Housing for local people connected to their local community is important for viability and sustainability of rural communities.	Community-led projects, sites identified through Neighbourhood Planning, and rural exceptions sites are expected to deliver a significant amount of small-scale residential development.
EDCLP/147 Hoton Parish Council	The strategy in urban areas will differ from that in rural locations and villages. It should take into consideration the contents of Neighbourhood Plans.	The Council expects to make effective use of NPs, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare. Small sites are expected to be delivered across the borough in accordance with the development strategy set out in Draft Policy LP1.
EDCLP/165 Dr S.J.Bullman	What better way to address my response to Q4 above than to implement this policy across a number of smaller villages/hamlets?	Noted – small sites are expected to be delivered across the borough in accordance with the development strategy set out in Draft Policy LP1
EDCLP/180 Alex Prowse Astill Planning Consultants obo Mr Fothergill	The Housing White Paper 2017 ¹ sets out the Government's desire to see planning policies support more small sites. Additionally, the Government's response to the Housing White Paper 2017 consultation ² set out that "Small sites can make an	Noted – support is welcomed. A more detailed housing trajectory will be prepared as part of the next draft of the local plan.
	important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."	The Council acknowledges the submission of "Land adjacent 55 Main Street in Ratcliffe on the Wreake". The site will be assessed as part of the SHELAA.

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CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	The Government reaffirmed its ambition to encourage a greater use of small sites in paragraph 68 of the NPPF in the hope that this would support SME builders, increase the number of schemes that can be built-out quickly, speed up the delivery of housing and diversify the house building market.	
	The Charnwood Borough Housing Delivery Study (December 2017) also makes the following statements in support of allocating more small sites across Charnwood: "Releasing more large sites alongside a good mix of smaller and medium sized sites will be essential if the Borough is to have the best possible chance of meeting its housing need." (paragraph 1.4); and "small and medium sites are able to be brought forward quickly to fill in demand "gaps". This reflects the inherently more dynamic and responsive nature of smaller sites compared with large sites with long lead in times and more significant infrastructure requirements." (paragraph 8.10)	
	The above factors clearly demonstrate that allocating small sites for development should help to increase the number of sites that can be built-out quickly. This has the potential to improve the Council's ability to demonstrate a deliverable five year housing land supply and perform well in the Housing Delivery Test.	
	Charnwood Borough Council's aspiration to deliver 10% of new homes on small sites of one hectare or less is therefore welcomed. However, the list of proposed Housing Sites in Draft Policy LP 3 does not indicate the size of the proposed site allocations. Consequently, it is not clear from the information available in the Draft Local Plan whether the proposed residential allocations, together with the sites on the Council's brownfield land register, meet the 10% small sites requirement set out in paragraph 68 of the NPPF.	
	In light of this, it is considered that more could be done to increase the prospects that 10% of new homes will be delivered on small sites of one hectare or less. For instance, it is suggested that allocating a greater number of small sites for residential development would help to provide added certainty that the 10% target can be delivered in practice.	
	As the site in question measures approximately 0.64 bectares in	

As the site in question measures approximately 0.64 hectares in

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RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land EDCLP/205 Guy Longley Pegasus obo Davidsons Development Ltd (Anstey) EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold) EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold) EDCLP/208	 extent, it would qualify as a small site based on the definition in the NPPF. It is therefore considered that the land adjacent 55 Main Street in Ratcliffe on the Wreake should be allocated for residential development in the new Charnwood Local Plan. The NPPF requires local planning authorities to deliver 10% of new homes on sites of 1 ha or less. Some 27 of the proposed draft housing allocations involve development on smaller sites of less than 1 ha. Whilst this provides for a mix of sites of varying sizes, the risk is that, very often, the deliverability of these smaller sites can be uncertain, due to landownership or access issues. As outlined in response to Question 3b, this is a further reason why the plan should build in sufficient flexibility to ensure that the plan is sufficiently resilient to deal with potential under delivery on smaller sites. 	Noted – the proposed allocations have been assessed to determine whether they are suitable, available, and achievable; and as such whether they are deliverable or developable. The Council appreciates challenges associated with delivering smaller sites, but evidence (and the strength of consultation responses) would indicate that the deliverability of larger sites is uncertain due to landownership or access issues. As such, a balanced and mixed portfolio of sites is needed to reduce risk and optimise deliverability.
EDCLP/209 Amy Smith Pegasus obo Jelsons	 The NPPF requires local planning authorities to deliver 10% of new homes on sites of 1 ha or less. Some 27 of the proposed draft housing allocations involve development on smaller sites of less than 1 ha. Whilst this provides for a mix of sites of varying sizes, the risk is that, very often, the deliverability of these smaller sites can be uncertain, due to landownership or access issues. In proposing to allocate smaller sites, the Council needs be confident that these allocations are deliverable. There are significant questions on the delivery of a number of the smaller sites proposed for allocation. As outlined in response to Question 3b, this is a further reason why the plan should build in sufficient flexibility to ensure that the plan is 	Noted – the proposed allocations have been assessed to determine whether they are suitable, available, and achievable; and as such whether they are deliverable or developable. The Council appreciates challenges associated with delivering smaller sites, but evidence (and the strength of consultation responses) would indicate that the deliverability of larger sites is uncertain due to landownership or access issues. As such, a balanced and mixed portfolio of sites is needed to reduce risk and optimise deliverability.

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	sufficiently resilient to deal with potential under delivery on smaller sites.	
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	Whilst it is a requirement of the NPPF that 10% of housing needs should be met on small sites, it is important that a positive and plan-led approach is taken to identifying these sites now. In order to provide certainty, the distribution of these sites should be identified in broad terms and, as required by paragraph 65 of the NPPF, a specific quantum of required development allocated to individual settlements, so that Neighbourhood Plans have the certainty they require to ensure their contribution to meeting the Borough's housing needs.	Noted – the Council believes that the development strategy (as tested through the SA process) facilitates a sustainable pattern of development. Similarly, the type and range of housing sites across the borough would suggest that the Council will be able to demonstrate that 10% of new dwellings is to be delivered on sites that are less than one hectare. Further site assessment work is taking place, and the outcome of this additional analysis will inform a revised list of proposed housing allocations. These will be set out in the next draft of the local plan.
	For locations where no Neighbourhood Plan is brought forward, the Local Plan should also include permissive policies which allow development within or adjacent to these settlements in order to meet each settlement's identified requirement, subject to other criteria ensuring their overall suitability. A good local example of this policy is GD2 from the Harborough Local Plan, which was adopted in April 2019, and provides a plan-led approach without requiring site-specific allocations for all sites. We would also reiterate that settlement-specific housing targets must also be expressed as minima.	
EDCLP/226 Eleanor Hood	Developmental strategy. Possibly brown field sites could be more suited to housing for students.	Noted - the Council expects to make effective use of brownfield land, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare.
EDCLP/254 Ian Deverell Turley on behalf of Rainier Developments Ltd)	 Paragraph 68 of the NPPF, seeks to 'promote the development of a good mix of sites' and specifically identifies the opportunity got at least 10% of the housing requirement to be delivered on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target. For Charnwood 10% of the proposed low housing growth scenario is 1,839 dwellings. It is unclear how many allocated sites in Draft 	Noted – the Council believes that the development strategy (as tested through the SA process) facilitates a sustainable pattern of development. Similarly, the type and range of housing sites across the borough would suggest that the Council will be able to demonstrate that 10% of new dwellings is to be delivered on sites that are less than one hectare. Further site assessment work is taking place, and the outcome of this
	Policy LP3 are less than 1 hectare, and generally what sites are to be delivered to align with this policy. If this is less than 10% the Council should ensure that the Local Plan is consistent with national policy. The identification of small sites should not be deferred to Neighbourhood Plans. Notwithstanding this, and reflecting upon paragraph 68 of the NPPF, Rainier considers that the distribution of housing as	additional analysis will inform a revised list of proposed housing allocations. These will be set out in the next draft of the local plan. A detailed housing trajectory will be provided as part of the next draft of the local plan.
	currently drafted does not promote a good mix of sites, and instead	

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EDCLP/255 lan Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	 is status quo with the effective rolling forward of the adopted spatial strategy. As set out above, the Plan should seek to recognise the important contribution which small and medium sized sites can make in meeting the housing requirement of an area and seek to direct additional growth to the most sustainable settlements within the District, such as Shepshed. Paragraph 68 of the NPPF, seeks to 'promote the development of a good mix of sites' and specifically identifies the opportunity got at least 10% of the housing requirement to be delivered on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target. For Charnwood 10% of the proposed low housing growth scenario is 1,839 dwellings. It is unclear how many allocated sites in Draft Policy LP3 are less than 1 hectare, and generally what sites are to be delivered to align with this policy. If this is less than 10% the Council should ensure that the Local Plan is consistent with national policy. The identification of small sites should not be deferred to Neighbourhood Plans. Notwithstanding this, and reflecting upon paragraph 68 of the 	Noted – the Council believes that the development strategy (as tested through the SA process) facilitates a sustainable pattern of development. Similarly, the type and range of housing sites across the borough would suggest that the Council will be able to demonstrate that 10% of new dwellings is to be delivered on sites that are less than one hectare. Further site assessment work is taking place, and the outcome of this additional analysis will inform a revised list of proposed housing allocations. These will be set out in the next draft of the local plan.
	NPPF, Rainier considers that the distribution of housing as currently drafted does not promote a good mix of sites, and instead is status quo with the effective rolling forward of the adopted spatial strategy. As set out above, the Plan should seek to recognise the important contribution which small and medium sized sites can make in meeting the housing requirement of an area and seek to direct additional growth to the most sustainable settlements within the District, such as Wymeswold.	
EDCLP/258 Sam Heaton Heaton Planning on behalf of Swithland Homes	It is considered that small sites should play a much greater role in housing delivery to achieve the new local plan targets within the Borough. It would be to the benefit of the local planning authority to allocate	Noted – the Council welcomes the constructive feedback and suggestions. Carrying out a more focused analysis of small-sites across the borough, and engaging with the development industry to better understand how
Ltd	smaller housing sites in the emerging local planning authority to allocate smaller housing sites in the emerging local plan. The scale and nature of development should be clarified through appropriate definitions included within the supporting text of the respective policy.	and engaging with the development industry to better understand how these sites are delivered, does appear to be a proactive approach. The Council will be reviewing the sites assessed through the SHELAA (along with new sites received during the recent Call for Sites process) to
	Furthermore, the Council could be more proactive in how they aid the identification and promotion of prospective allocations. In addition to the opportunities through the Strategic Housing Land	identify sustainable and deliverable development sites.

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EDCLP/202 Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	Availability Assessment (SHLAA), a separate housing land register or action plan which specifically outlines measures to ensure the delivery of small sites may clarify and provide a further understanding of available land. Additional opportunities to bring small sites forward may come through a specialist small developer forum, which is becoming an increasingly popular method of engagement throughout the Midlands region. It is widely accepted and proven in the examination of Local Plans that higher housing delivery is achieved by allowing development on more sites (number), in all settlements, and on sites of varying sizes. To achieve the Council's above aspiration, more small sites of 1ha or less should be allocated in the Plan to avoid unintentional preclusion of these sites by other Plan policies.	Noted – the Council intends to satisfy the requirements of Paragraph 68, either by identifying land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; or demonstrate through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.
EDCLP/182 Pegasus obo David Wilson Homes	The NPPF requires local planning authorities to deliver 10% of new homes on sites of 1 ha or less. Some 37% of the proposed draft housing allocations involve the development of sites of less than 1ha. Whilst this provides for a mix of sites of varying sizes, the risk is that, very often, the deliverability of these smaller sites can be uncertain, due to landownership or access issues. For this reason, the Charnwood Local Plan should build in sufficient flexibility to ensure that it is sufficiently resilient to deal with any under-delivery on smaller sites.	Noted – the proposed allocations have been assessed to determine whether they are suitable, available, and achievable; and as such whether they are deliverable or developable. The Council appreciates challenges associated with delivering smaller sites, but evidence (and the strength of consultation responses) would indicate that the deliverability of larger sites is uncertain due to landownership or access issues. As such, a balanced and mixed portfolio of sites is needed to reduce risk and optimise deliverability.
EDCLP/160 Persimmon Homes	Paragraph 68a of the revised NPPF states that, 'identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.' As such, the council need to identify a mix of different sites in various locations in order to provide a greater level of choice for consumers	Noted – the Council intends to satisfy the requirements of Paragraph 68, either by identifying land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; or demonstrate through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.
EDCLP/239 Vivienne Barratt- Peacock	Concentrate on windfall sites and bringing empty buildings back into use. Small sites are best for existing residents as they have less of an impact on the community.	The Council expects to make effective use of windfalls and bringing empty buildings back into use, but it is likely that further sites will be needed to achieve 10% of all new dwellings on sites less than one hectare. Small sites are expected to be delivered across the borough in accordance with the development strategy set out in Draft Policy LP1.
EDCLP/210 Boyer Planning obo Stagfield	We consider that the solution to achieving the aspiration of 10% of new homes on small sites of 1ha or less can be found in increasing the distribution of housing to the 'Other Settlements' as defined in	Noted – the development strategy is one of urban concentration and intensification. As such, the Council would expect 10% of the housing requirement to come forward on sites throughout the borough. Indeed,

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Group	the Settlement Hierarchy. The delivery of housing on such sites is typically more appropriate for 'Other Settlements' due to the comparatively modest level of service provision and infrastructure, which otherwise could be unduly over-stretched by larger residential-led schemes.	the effective use of brownfield sites in urban areas is seen to be an important supply of such sites. The Council expects a balanced and mixed portfolio of sites to come forward through the local plan to reduce risk and optimise deliverability.
EDCLP/195 Greg Hutton Davidsons	The NPPF requires local planning authorities to deliver 10% of new homes on sites of 1 ha or less. Some 27 of the proposed draft housing allocations involve development on smaller sites of less	Noted – the proposed allocations have been assessed to determine whether they are suitable, available, and achievable; and as such whether they are deliverable or developable.
Developments Ltd	than 1 ha. Whilst this provides for a mix of sites of varying sizes, the risk is that, very often, the deliverability of these smaller sites can be uncertain, due to landownership or access issues.As outlined in response to Question 3b, this is a further reason why the plan should build in sufficient flexibility to ensure that the plan is sufficiently resilient to deal with potential under delivery on smaller sites.	The Council appreciates challenges associated with delivering smaller sites, but evidence (and the strength of consultation responses) would indicate that the deliverability of larger sites is uncertain due to landownership or access issues. As such, a balanced and mixed portfolio of sites is needed to reduce risk and optimise deliverability.
EDCLP/193 Richard Webb	Where planning allows I believe that small scale in fill development should be favoured when in the limits of development of villages.	The Council expects that infill development would take place during the plan period – and, for example, Draft Policy LP1, Draft Policy LP14, Draft Policy LP15, and Draft Policy LP17 all provide the ability to deliver small-sites and infill across the borough.
EDCLP/204 Guy Longley Pegasu s obo Davidsons Development Ltd (Rothley)	The NPPF requires local planning authorities to deliver 10% of new homes on sites of 1 ha or less. Some 27 of the proposed draft housing allocations involve development on smaller sites of less than 1 ha. Whilst this provides for a mix of sites of varying sizes, the risk is that, very often, the deliverability of these smaller sites can be uncertain, due to landownership or access issues. As outlined in response to Question 3b, this is a further reason why the plan should build in sufficient flexibility to ensure that the plan is sufficiently resilient to deal with potential under delivery on smaller sites.	Noted – the proposed allocations have been assessed to determine whether they are suitable, available, and achievable; and as such whether they are deliverable or developable. The Council appreciates challenges associated with delivering smaller sites, but evidence (and the strength of consultation responses) would indicate that the deliverability of larger sites is uncertain due to landownership or access issues. As such, a balanced and mixed portfolio of sites is needed to reduce risk and optimise deliverability.
EDCLP/151 Andrew Thomas Thomas Taylor Planning Ltd obo Mr W Murdoch	The draft Plan's Development Strategy and intention to distribute an element of housing provision throughout the Service Centres is supported. Furthermore, proposed Housing Allocation HS52 (Land adj. 84 Melton Road, Barrow upon Soar – see Figure 1 below) is supported. Proposed Housing Allocation HS52 in Draft Policy LP3 amounts to approximately 0.8Ha (gross) although the net developable area is less reflecting the land occupied by the existing house. The development of this site would help to contribute towards the draft Plan's aspiration of delivering 10% of new homes on sites of 1.0Ha or less although Draft Policy LP3 should be amended to refer to a development of "up to" 18 dwellings to reflect	Noted – support is welcomed.

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	site constraints and net developable area.				
DCLP/261 Edward Argar MP	cf. note above. I would also argue that 794 additional homes in 'other settlements' is too high	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a distribution of 800 additional dwellings in the Other Settlements) is the spatial strategy option with the fewest significant negative effects, and the greatest significant positive effects.			
EDCLP/177 Sue Green House Builders Federation	The HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided therefore SUEs should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. Under the 2019 NPPF, the Council should identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). For Charnwood 10% of the proposed low housing growth scenario is 1,839 dwellings. It is unclear how many allocated sites in Draft Policy LP3 are less than 1 hectare. If this is less than 10% the Council should ensure that the Local Plan is consistent with national policy. The identification of small sites should not be deferred to Neighbourhood Plans.	The Council expects 10% of the housing requirement to come forward on small-sites throughout the borough. The Council expects a balanced and mixed portfolio of sites to come forward through the local plan to reduce risk and optimise deliverability A more detailed housing trajectory will be produced as part of the next draft of the local plan.			
EDCLP/194 Guy Longley Pegasus on behalf of Hallam Land Management	No comments.	Noted.			
	Q6 - LP1 - Development Strategy				
Do you have any	Do you have any comments on this draft policy? If you don't agree with the proposed policy please set out why and what alternative approach would you suggest?				
Do you think we h	nave missed something?				
DCLP/18 Dr Catharine	 I'd prefer to see expansion Confined to Loughborough and new amenities focused there. Otherwise development around the 	The overall spatial strategy is one of urban concentration and intensification. The policy framework is there to ensure that the most			
DCLP/18 Dr Catharine	 I d prefer to see expansion Confined to Loughborough and new amenities focused there. Otherwise development around the 	intensification. The policy framework is there to ensure that the most			

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Ferraby	•	Borough seems piecemeal with too few services at each site earmarked for housing. I have serious concerns about destruction of the environment with excessive house building on greenfield sites. There is not enough specific information about preservation of environment, habitat and wildlife.	environmentally sensitive areas will be protected.
DCLP/24 Ms Suzanne Collington	•	It is disappointing as it ignores the people's voices and goes against the Neighbourhood Plans. One can only feel that commenting on this draft policy is a pointless exercise as you won't listen anyway. You should listen to the local people who have spent hours investing in and contributing ideas to Neighbourhood plans to accurately reflect the issues in their areas.	The draft local plan has regard to all 'made' Neighbourhood Plans. Together the new local plan and made NPs will form the development plan for the borough. Once the draft local plan is adopted NPs will need to be in conformity with the local plan.
DCLP/76 Mr Paul Unwin	•	The development plan for Shepshed fails to provide a social/community central space for the people who live there. There is little opportunity to create a commercial town centre, given the changes in shopping habits, but a town square/plaza for public gatherings and cultural events is needed. The market place and Glenmore park are both out of view and unsuitable. The developments of the 1970s & 80s are not well served by bus services and these proposed developments follow this trend. My home (built in 1979) is a mile from the nearest 126/127/16 bus stop. The North and West sides of Shepshed are car dependent communities. I would expect public transport to be a greater focus in the plan and not left to commercial operators to develop. I raised this issue at the public display. And was told that the developments are 800m from a bus stop. This is the nearest point of each, quite large, development. Much of this new housing will not be near a bus stop to make public transport and environmentally sustainable living viable. Build in a bus system that is easily accessible to the whole of Shepshed including established developments. Tackle the issue of on-road parking on Leicester Road and Charnwood road to ease the ingress and egress of the town and reduce pollution due to idling traffic queues.	The regeneration of Shepshed is a corporate priority, and this is reflected in the draft local plan. Draft Policy LP15 and Draft Policy LP17 are focused on facilitating the regeneration of Shepshed and improving the vitality and vibrancy of the town centre. Specific investment schemes for the Bull Ring and Market Place are being directly supported by the Council. Sustainable transport solutions across the borough are being explored through the Sustainable Transport Study. Proposals can be facilitated through Draft Policy LP33.
DCLP/88 Mr Dennis Marchant	•	Basically agree but see Q4 above, the 'Share of Housing Provision' percentages should be adjusted to increase the Small Villages and Hamlets percentage and reduce the Service Centre percentage.	The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and

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		these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
		From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
		Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
DCLP/152 Mr David Campbell-Kelly	 See earlier comments on housing numbers and Leicester unmet need (Q3a and 3b) Do you think we have missed something? Leicester City's unmet need 	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
DCLP/178 Mr Joseph Hall	 It is agreed the following is a positive approach to promote walking and cycling; "minimise the need to travel, particularly by private car and encourage the use of public transport, walking and cycling;" the approach recommended by Manual for Streets – delivering a hierarchy of travel to prioritise active travel and use of sustainable travel methods – should be coordinated with other parties to ensure this policy can be achieved. 	Noted – Draft Policy LP33 facilitates the delivery of sustainable transport measures across the borough.
DCLP/193 Miss Shirley Dixon	 The 'Share of Housing Provision' percentages should be adjusted to increase the Small Villages and Hamlets percentage and reduce the Service Centre percentage. Do you think we have missed something? A reality check and listening to the people who live in Rothley and the other" service centres". New building has taken environment and green space and the services are at their limit. 	The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
		From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.

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DCLP/197	 Concerned that he plan appears to be based on the assumption 	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements and 1,000 new dwellings allocated to Service Centres) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. Noted – the HEDNA, LHN, and the forthcoming Housing Needs
Mr. John Catt	 that we will continue living as we do now. However, the growth in online shopping, an aging population, and home-working means will have to make different choices about where to live and how to use places. We need to look to build apartments (see towns and cities on the continent) which will enable a higher density of population and avoid the need to build on further green field sites that are remote from facilities. Also suggest that all urban developments should be of 4 stories with the upper stories used for apartments. The town centre would be much more attractive if it had a substantial balanced (not all students) resident population. 	Assessment provide the evidence on what type of housing is needed across the borough, looking ahead to 2036. Draft Policy LP2 and Draft Policy LP4 will ensure that the right type of housing will be built, in the right locations, to meet the locally defined need.
DCLP/205 Mr John Owens	 It is strangely weighted away from the north east, the wolds area. This has good road links to LEICESTER and Ultimately, m1 south. Good road links ne and thus a1 north. We should add a new road linking Kegworth m1north to Melton. No mention of rail links or use of east midlands airport and parkway. The 'small bits' approach is initially attractive but runs the risk of a series of stretched, inadequate, centres Ultimately,ly to become dormitories. Do you think we have missed something? Transport / Leisure / Hubs with a success plan and roles for independent traders. 	 The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements and 1,000 new dwellings allocated to Service Centres) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
DCLP/208 Mr John Barradell	• I cannot understand how you can compare the likes of Hathern and Wymeswold with Cossington and place them in the same category.	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the

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	• Any future development in Cossington will only put a further burden on surrounding villages due to there being no facilities in Cossington other than a small primary school, Church and Public House. Surely this must be obvious to the planning professional employed to produce this draft document.	range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
DCLP/231 Mr Gideon Cumming	 I disagree with the proposal to provide an additional 3,000m² – 4,500m² of additional retail space, until such time as the existing retail spaces are more effectively occupied. 	The draft local plan makes provision for retail floorspace to meet the need and demand from comparison retail (i.e. non-food retail). This small provision will help ensure the vibrancy and vitality of town centres, and in particular Loughborough town centre.
DCLP/249 Vale Planning Consultants	• We welcome the proposed Spatial Strategy outlined within Draft Policy LP1, and believe that a focus for new development within Leicester Urban Area, followed by other areas identified within the hierarchy will deliver a sustainable approach to the provision of new homes. We would encourage an element of flexibility within the percentage split between the locations for new development, in order to allow a responsive approach where necessary and appropriate.	Noted – the distribution strategy is predicated on the analysis in the SA, which shows the Hybrid options is the is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. Draft Policy LP1 allows for flexibility in considering proposals which align with the overall vision in those circumstances where a five-year housing land supply position cannot be demonstrated.
DCLP/274 East Leicestershire & Rutland Clinical Commissioning Group	The draft policy needs to consider impact on GP surgeries in the area and ensure adequate provision is made via s106 funding.	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on primary and secondary healthcare is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures.
DCLP/310 Dr Satbir Jassal	We disagree with the draft policy specifically around the issues of areas of separation and green wedges around the hamlet of Woodthorpe. The policy repeatedly mentions the importance of maintaining the local villages and hamlets and their historical character. The hamlet of Woodthorpe is mentioned in the Doomsday book and so should be recognised as a historical village. It is maintained the same number of housing for the last 400 years. The original area of separation and green wedges allowed the building of a massive housing estate up to the Borders of the village protected by a nature reserve. The amendments made in April 2018 did not seek the views of any of the residents of Woodthorpe. The amendments that the firm have proposed in terms of building up to the railway line go directly against the original local plan and will mean that the historical hamlet of Woodthorpe will be absorbed into the town of Loughborough.	Proposals at Loughborough / Woodthorpe are shaped by the Areas of Local Separation – ALS1 and ALS14.
DCLP/328 Mrs Alison	I'm concerned around the lack of provision for schools in Loughborough, Drs, road network etc.	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of

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Lawton-Devine	Increasing the number of residents without increasing the facilities access with drive up house prices near schools even higher. My children are going through the education system currently and even living in catchment area does not guarantee a place in the local school. There are a large number of empty business units in the town centre and I would like to see these filled before creating more. Snells Nook is horrendous for traffic at peak times and will only get worse if no road improvements are made before adding the science park. Arterial routes in and out of the town are heavily congested and become gridlocked if the M1 is shut. The green wedges between Outwoods and Loughborough which were only a few years ago promised to be retained are once again subject to erosion in the name of expansion. Resolve the amenities supply before increasing demand for already over subscribed services. Fill vacant business and residential properties before looking to expand into Greenfield areas and protect the green wedges.	the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. Impacts on the highway network have been considered through the Transport Modelling work and through the Sustainable Transport Study. The outcomes of this work will shape the final list of development sites that are proposed in the local plan.
DCLP/337 Sturdee Poultry Farms Ltd (Mr John Wheeler)	It is considered that the text of the first paragraph of the policy needs to make reference to sites allocated in neighbourhood plans. We would suggest the following wording; "We will support sustainable development within defined Limits to Development, in the allocations defined in this plan and in the allocations defined in neighbourhood plans" As noted in our responses to question 4, the development strategy does not sufficiently recognise the role that a wide range of settlements can play in securing sustainable development in rural areas. Therefore, the proportion of development to Other Settlements should be increased.	 Noted – this response will be used to inform the next version of the policy, and the draft local plan. Where policy wording can be strengthened to improve clarity and meaning, this will be taken forward by the Council. The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
DCLP/350	I broadly agree but note the points above about retail. We don't 245	Regenerating Loughborough and the other town centres is a corporate

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Mr John Barton	have much money to spend. If you want us to spend our precious money in Charnwood, you had better make our towns (especially Loughborough) a better place to visit. Free toilets etc. Otherwise the existing and newly built retail space will remain empty and unused.	priority. Draft Policy LP14, Draft Policy LP15, and Draft Policy LP17 seek to ensure that the towns remain vital and vibrant for the future.
DCLP/392 Dr Martin Field	The bald percentage of new provision in Other Settlements and Hamlets can permit uneven development in a few locations that could be the focus of unbalanced speculative development. See the answer given earlier for setting limits to the extent of any growth in household numbers within 'Other Settlements' and 'Hamlets' as a maximum percentage of new household numbers in any one given location (Q4). The extent to which small local communities could support the right scale of development in relation to their area's current size may be under-estimated - many local communities can support small-scale growth but wish to avoid this support enabling larger speculative interests from ruining local environments.	 The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 800 new dwellings allocated to Other Settlements) is the spatial strategy option that has the fewest significant negative effects, and the
DCLP/408 Mr Martin Smith	Do you have any comments on this draft policy? Great focus on sustainability If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? An ageing population; developed of urban centres to cater for the elderly in sustainable manner. Much greater planning required for public transport. Many roads and junctions are currently close to capacity and increasing road capacity is not desirable with a climate emergency. Do you think we have missed something? Tree planting, parks, healthcare,	greatest significant positive effects. Noted – the policy framework set out in the draft local plan can facilitate those aspects set out in the consultation response.
LDCLP/02 Anonymous	More balance and more services for young people/workers	Noted – the draft local plan responds to the defined local needs of all age groups.
LDCLP/22 Anonymous	Consideration needs to be given to pollution – more housing = more cars= increased global warming poorer air quality increased levels of sickness in the community I feel development should be small local developments on brownfield sites rather than huge estates that change the character of the whole area.	The overall spatial strategy is one of urban concentration and intensification. This includes a strong focus on delivering new development on brownfield sites and bring empty/derelict homes back in to use.

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	Please note there are derelict houses in ?? that would be developed without taking green field sites.	
LDCLP/51 Anonymous	Stop big greedy houses and encourage more affordable simpler builds that don't line the pockets of rich house builders.	Noted – the draft local plan responds to the defined local housing needs. Draft Policy LP2 and Draft Policy LP4 will ensure that affordable, good quality housing is delivered in the borough.
EDCLP/17 Roger Collier	My main concern is the amount of proposed development in Shepshed. We have yet to see the effect of all the approved planning applications especially on the traffic getting out/into Shepshed on the A512 including when the housing on Garendon is completed with the possibility that many of the new residents there will be heading East and or for the A42/M42 on the A512. There will be a lot of internal traffic (on narrow roads with on street parking) during school term time as most school runs will be beyond walking distance. There is one proposed area for housing outside the line of current/approved/other proposed housing and on the opposite side of Black Brook! This will open up for planning applications further along that side of Black Brook. There is also a narrow bridge and road between this area and Shepshed. Access in/out of Fairway Road South is already difficult without the added housing in that area which is adjacent to the M1. Do any of the people drafting the proposal live this near a motorway or major trunk road? Why are there no proposed developments in the NE, SE or SW? Should there be more development along the railway line in the Soar valley to encourage less road use. How about running a public service on the Great Central Railway linking to Loughborough and South Nottingham with extra houses on the route.	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. Impacts on the highway network are being considered through the Transport Modelling work and through the Sustainable Transport Study. The outcomes of this work will shape the final list of development sites that are proposed in the local plan.
EDCLP/34 Cllr Mary Draycott	SHEPSHED. 2074 new homes is not acceptable on top of the large number built and being built at the moment. In addition were this to go ahead it will mean Shepshed is joined to Loughborough and it is struggling now to keep any identity this will only make matters worse. People will be so far from its centre/s they will see themselves as living, working and socialising in Loughborough and from Loughborough. Enough is enough if more thought had been given then the total number of new housing could have been accomplished with one new large settlement/SUE in Cotes. See earlier comments (Q3b and Q4).	The decision to direct growth towards Shepshed is borne from the evidence base on technical matters, including: landscape sensitivity, transport and accessibility, regeneration opportunities, and the broader links to the ambitions set out in the Leicester and Leicestershire SGP. Alternative distribution strategies were defined and tested through the SA process. This also included the possibility of a new settlement. The new settlement concept was considered within the SA as part of four different 'high-level' housing growth scenarios / distribution options; and two of the 'refined' options.
		However, Ultimately, the Second Interim SA Report notes that the

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		 'Hybrid' option (which allocates 2,000 new dwellings to Shepshed) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The preferred development strategy is therefore an urban concentration and intensification strategy, with some growth dispersed to other areas.
EDCLP/42 Mrs J Vann	I have just spent a long time reading through the Draft local plan 2019-36. I live in Syston where there is a proposal to build in total 1323 houses. Whilst I appreciate the need for more housing my concern is how Syston copes with this increase in population. The traffic is already at a level that the roads can't cope with, parking in the town is virtually non existent. The schools are full and to get a Doctor's appointment is a nightmare. According to the plan this has all been taken into consideration. My personal feeling is that no houses should be built until the relevant infrastructure is in place.	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures. Impacts on the highway network are being considered through the Transport Modelling work and through the Sustainable Transport Study. The outcomes of this work will shape the final list of development sites that are proposed in the local plan
EDCLP/59 Anonymous	As a resident of Quorn, and in relation to draft Policy LP1, I commend the clarity and boldness with which specific principles are set out, including the following: 'Development will be directed to those locations of the least environmental or amenity value and to locations within the Borough at the lowest risk of flooding Areas designated as Countryside, Areas of Local Separation, Green Wedges and Charnwood Forest Regional Park are an integral part of the spatial strategy that has been identified to deliver growth in the context of the objective to conserve and protect the character of our towns and villages and the intrinsic character and beauty of the countryside Development proposals which do not accord with the pattern of development in the spatial strategy will not be considered compatible with the vision and will not meet the objectives of the plan and as a result will not be supported, even where there is a proven shortfall in the supply of homes.' I fully endorse these principles in the Spatial Strategy and the comments on its Implementation. As a resident of Quorn, the strong statements are crucially important. Not least (1) Quorn is at high risk of flooding (p.103), (2) there is a clearly designated Area of Separation between Quorn and Loughborough on Policies map 1, and (3) on page 38 it is specifically stated in relation to housing that Quorn would be expected to contribute 75 additional homes	Noted – support is welcomed.

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	only, and that these would be located on Loughborough Road (also identified on Policies Map 1). I highlight these three points because I support their consistency in terms of outcomes for Quorn and would hope that a similar consistency applies to other communities.	
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	Our comments on this draft policy is set down in our response to Question 4. In total provision should be made for at least 23,000 new homes over the plan period 2019-2036 to take into a proportion of Leicester City's unmet housing needs. Of these at least 9,000 (including existing commitments) should be provided on the edge of Leicester, 3,000 within and adjoining the main service centres and 6,800 at Loughborough. We support the policy statement that ' <i>Proposals for development</i> <i>which hare not allocated in this local plan but accord with the</i> <i>vision, pattern of development and other requirements of this policy</i> <i>are likely to be approved where a five year supply of homes cannot</i> <i>be demonstrated'.</i>	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/65 Mr W Leek	I see insufficient mention of the impact of yet more homes on essential services such as Doctors and Dentist surgeries, which are already either absent, or stretched to breaking point. The Healthcare centre mooted for the Birstall SUE is <u>absolutely</u> <u>essential</u> , not a "nice to have" option.	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures.
EDCLP/74 Mr Hussain	The policy fails because the LA has planned housing in complete disagreement with wider community objectives, which then creates pandemonium in all other environmental areas. According to the local authority's statement; "the preferred strategy is to protect the intrinsic character of the countryside whilst supporting the vitality and viability of our most rural communities". That said, it makes little or no sense for building new homes and disrupting that endeavour when we can easily increase the occupation of existing homes for social housing purposes that are already on the open market in order to deliver a much wider-margin of public appreciation that addresses a number of concerns associated with all forms of the housing crisis.	Noted – the local plan addresses the identified needs of the local area. Draft Policy LP4 facilitates affordable housing.
	High quality designs, tackling the climate change, improving biodiversity and facilitating healthier lifestyle options all connect under what I am proposing. Reducing stress related symptoms also reduces the valuable time consumed by our NHS addressing them who are already greatly understaffed. The problem with Charnwood LA, is that it thinks in affluence & not in impoverishment where their thought process as a responsible	

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	authority should to be.	
	Can't see any business critical need to engage in this just yet although it being a very important issue, not at least, whilst we have a housing crisis in the borough and surrounding areas. This has little bearing on the advancement of humans in terms of their mental wellbeing & sense of security. Resolve the housing crisis and stop wasting money!	
	You have missed lots and lots of homes for people that need them and not undignified uniformed rabbit hutches that ooze social stratification which sequentially offers no encouragement whatsoever to improve people's standard of living or even give them a semblance of hope that a meaningful existence awaits them. What a pathetic system of governance Charnwood has.	
EDCLP/83 Berrys on behalf of Moss Solicitors	• This representation is submitted on behalf of our client, Moss Solicitors, who are instructed to act in the Estate of Renee Elizabeth Lorrimer, late of 83 'Northfield', Cotes Road, Barrow upon Soar, Leicestershire.	Noted – the Council acknowledges receipt of the submission for Land at 83 (Northfield) and 87 Cotes Road, Barrow upon Soar. The site will be assessed as part of the next stage of preparing the local
	• It is considered that the Council's emerging draft Local Plan version as proposed complies with the Duty to Co-operate requirements. However, it is not considered that the emerging Local Plan is legally compliant or sound, as explained below:	plan.
	 Objection is raised to the Charnwood Borough Council's decision to exclude land at 83 ('Northfield') and 87 Cotes Road, Barrow upon Soar (the subject land) from the village Limits to Development. 	
	• The site is an edge-of-settlement location to the west of Cotes Road which abuts the main built-up framework of Barrow upon Soar at the western edge of the village. The site comprises two detached dwellings (nos. 83 'Northfield' and 87 Cotes Road), an outbuilding and extensive areas of garden land to the side and rear of both properties. The site extends to approximately 3.98	
	hectares in gross area and comprises a mixture of greenfield and brownfield land.	
	• The site is evidently part of the village built up area and site which forms part of the urban fabric of Barrow upon Soar. The site is integral to the built-up area, and merits inclusion within	
	the village Limits to Development.The subject land has no physical or legal constraints to	
	redevelopment of the site, and there are therefore no factors	

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	 which would hinder the suitability, achievability or delivery of sustainable housing at this location. The inclusion of the subject land within the designated Limits to Development would represent a logical 'rounding off' of both the physical urban boundary of Barrow upon Soar and the built form of the village in this area of the settlement, without resulting in harm to the openness of the countryside or the amenity of neighbouring properties. The development of the site would visually complement the existing housing along Cotes Road/Blake Close. Access will be taken from the existing access point along Cotes Road to no. 87. If necessary, the access will be upgraded to serve a residential/mixed use development within the site, and can be enhanced to sufficient width and provide adequate visibility splays in both directions along Cotes Road. CONCLUSION AND SUMMARY It is considered that the following changes are required to ensure the Local Plan is suitable, appropriate legally compliant and 'sound'. Charnwood Borough Council is required to ensure its Local Plan is positively prepared, justified, effective and consistent with national planning policy. To meet the criteria set out in national legislation the emerging Policies Map should be amended to include land at 83 and 87 Cotes Road, Barrow upon Soar (the subject land) within the Limits to Development boundary. Please refer to the attached plans and drawings, including the Site Location Plan (KA34731-001) and the Development Boundaries Plan (drawing ref. KA34731-004). 	
EDCLP/95 Barrow Upon Soar Parish Council	• The Strategic Growth Plan is the overarching plan that sets out the aspirations for delivering growth in Leicester and Leicestershire up to 2050.	 The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the

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• • T In u 2 2 su pl au T c c st e au T c c st e au T c c st e au T c c st e au T c c st e au T c c st e au T c c st e au T c c st e au T c c st o d c st o st o d c st o d c st o st o d c st o st o st o st o st o st o st o st	development strategy it is reasonable to see this proportion decline, but the new housing provision for Rural Centres will be 12.8%. Furthermore, in seeking to provide for new development, the Draft Local Plan has not considered the capacity of available services and infrastructure to accommodate growth. There are issues about the capacity of the transport network, primary school, doctors' surgery and village centre car parking. There are also concerns about the lack of a community centre. Traffic In response to ongoing concerns about traffic conditions in Barrow upon Soar and Sileby, Leicestershire County Council published the 2016 Sileby & Barrow upon Soar Transport Study. The report summarises transport conditions and known development proposals in Sileby and Barrow upon Soar to inform future highway divice on development proposals in these villages. Traffic entering and leaving Barrow upon Soar via the A6 concentrates onto the historic Barrow Road Bridge, a listed tructure. This is single lane and signal controlled. It has already exceeded its effective operational capacity and queuing and delays are a frequent issue. There is no easy way to improve the bridge. The alternative route to and from the A6 via Slash Lane to the east of the village is regularly inundated by River Soar and has been dentified by the Environment Agency (EA) as being susceptible to at in 1 year event. Barrow Road between Barrow and the A6 is also susceptible to flooding, with defences protecting the road to mit the risk to a 1 in 10-year event. When flooding occurs, road closures cause widespread congestion on the remaining available outes and can affect bus services as traffic travelling from Sileby is liverted through Barrow when Slash Lane and Mountsorrel are not passable. Within the village, many people have raised concerns about congestion – in Bridge Street, Beveridge Street, Church Street, Varmer Street, Grove Lane, High Street and North Street. This is often caused by bus stops and on-street parking on the narrow village cent	Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 1,000 new dwellings allocated to Service Centres) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures.

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	result in increased delays in the village especially at locations such as Bridge Street and Grove Lane. The 2016 Sileby & Barrow upon Soar Transport Study concludes that it is likely that any additional development, over and above that already committed, will have severe impacts unless suitable mitigation is secured. Suitable mitigation at the main pinch points within the village is not considered feasible, primarily due to lack of any extra physical highways capacity at the junctions, which have exceeded their capacity, and the general poor geometry of the highway network in these locations. Policy BuS13 of the 'made' Barrow upon Soar Neighbourhood Plan states that 'New housing developments of more than ten dwellings will not be supported unless it can be demonstrated that the residual cumulative impact will not make existing traffic conditions worse.' The Policy was supported by the Highway Authority and Charnwood Borough Council.	
	Rail Barrow upon Soar railway station is located on the Midland Main Line between Leicester and Loughborough. The station is served Monday to Saturday by East Midlands Trains, who operate local services from Leicester to Nottingham and Lincoln via Loughborough and Newark. There is no Sunday service or late evening service. The train station has limited ticket collection or purchasing facilities. There is no car parking or drop-off space and it is only accessible by many steps, so it is unsuitable for people with mobility problems. The station is unstaffed with isolated platforms with little in the way of shelter.	
	Primary School Hall Orchard C of E Primary School is the largest primary school in Charnwood Borough. The School has a net capacity of 525 and 611 pupils are projected on the roll; a deficit of 86 pupil places. This does not consider the additional growth planned by the Draft Local Plan. There are currently no pupil places at this school being funded from S106 agreements for other developments in the area. Barrow Hall Orchard C of E Primary School sits on a confined site and it has been working to increase capacity on a phased basis due to rising births and existing housing gain in the area, the final phase of expansion will increase the capacity to 630 places. This is	

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	the largest size for a primary school and utilises all available space for expansion. The school cannot be expanded any further to accommodate the pupils generated by the proposed housing growth in the Draft Local Plan. The Education Authority conclude that in the absence of any other school within 2 miles, a new school is needed to accommodate the proposed growth. There are no plans in the Draft Local Plan for a new school. If a new school is not built, the proposed growth will give rise to unsustainable patterns of transport with children having to travel to the nearest school with capacity. Barrow Health Centre The health Centre was purpose built in 1980 around which time the practice list of 5,500 was broadly comparable to the population. The current population of Barrow upon Soar is circa 6,000 but the practice list is around 8,800. The premises are the same size now as they were then but there have been adaptations in response to a rising population, with developer contributions being used for refurbishment in 2011, bringing into use rooms vacated by district nurses, health visitors and school nurses. The practice boundary has been redrawn to curtail pressure and patients are no longer accepted from outside the boundary. The health centre has already seen a 3% rise in patient registration over the past 5 years. It is understood that there is no prospect of NHS funded capital investment at present. Many people responding to our surveys raised complaints about the service, including difficulties in making appointments. Adding patients to the current practice list will cause deterioration in the services offered. The additional patients generated by the development proposed by the Draft Local Plan would have a significant impact to Barrow Health Centre.	
	Village Centre Car Parking In 2015 Charnwood Borough Council undertook a Car Parking Impact Assessment of the Borough's main centres, including Barrow upon Soar Village Centre. The results of the surveys showed that both the High Street and the Co-op/Health Centre car parks were over 100% occupied (i.e. some vehicles were observed parking in areas where restrictions are in place and/or outside marked spaces) in the 09:00-11:00 beat of the Thursday survey. The High Street Car Park was also over	

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	100% occupied in the 11:00-13:00 beat of the Thursday survey. The Borough Council's Car Parking Impact Assessment also considered parking demand taking account of future housing growth. The calculations of future parking demand in Barrow upon Soar indicate that overall occupancy levels at off-street locations will exceed 85% during the week and on Saturday's occupancy levels are estimated to exceed 85% during morning periods. The assessment concludes that to address the shortfall in parking in Barrow upon Soar in the period up to 2036, some 20 to 30 additional off-street car parking spaces should be provided.	
	Community Centre There is a good range of clubs, societies and social organisations in Barrow upon Soar. Some of these use the facilities at Humphrey Perkins School. The school has extensive facilities which are available for private hire on week day evenings and weekends. However, the facilities are used by the school during term-time and are also too large and expensive for many community groups. Although the village also has several small rooms that are available to hire on an hourly basis, they are under considerable pressure. As a result some groups are unable to find a permanent home and have left the village due to the lack of suitable space (table tennis, archery, ballroom dance) and there is no suitable space for other activities such as a day-care centre, soft-play area or youth centre. Other clubs and societies have long waiting lists. A dedicated community building is essential particularly if the village is to grow further.	
	Limits to Development The Policies Map shows preferred settlement Limits to Development for Barrow upon Soar. Limits to Development have already been defined for the village in the Barrow upon Soar Neighbourhood Plan. The Draft Charnwood Local Plan 2019-36 should take steps to ensure that Limits to Development are aligned or take other steps to avoid duplication.	
	Conclusions While the Parish Council supports an overall spatial strategy for Charnwood based on urban concentration and intensification, this is not compatible with continued growth in rural villages. Nor is ongoing growth in villages compatible with the Strategic Growth Plan.	

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EDCLP/96 Marrons on behalf of UCR Construction and Development Ltd	 a) Furthermore, it is very clear that new housing development cannot be accommodated within Barrow upon Soar without very significant investment in infrastructure and services. With no plans for such improvements, it follows that the housing provision for Barrow upon Soar should be deleted. The development strategy contained in the Draft Charnwood Local Plan is based upon a sensible assessment of services and facilities and resultant settlement hierarchy. The strategy proposes to meet the need for homes with a margin for flexibility, including the provision of 2,490 homes at Service Centres. The strategy also recognises the need to make efficient use of land including brownfield or underused land and buildings and conserve the built environment. It is our view that in general terms the Draft Plan sets out an appropriate development strategy; the plan seeks to meet the standard methodology, provides for a degree of flexibility in the amount of land released, sets out an appropriately through the hierarchy by way of a range of sites including those which are 	Noted – support is welcomed.
	smaller and likely to contribute to a deliverable supply of land. For clarity, we are supportive of this strategy and Sileby being identified as a Service Centre, capable of meeting the day to day needs of its residents.	
EDCLP/97 Marrons on	The development strategy contained in the Draft Charnwood Local Plan is based upon a sensible assessment of services and facilities	Noted – support is welcomed.
behalf of Clarendon Land & Development Ltd	and resultant settlement hierarchy. The strategy proposes to meet the need for homes with a margin for flexibility, including the provision of 945 homes at Other Settlements. The strategy also recognises that as settlements grow there is pressure on open land and impacts on the separation and identity of settlements. It is our view that in general terms the Draft Plan sets out an appropriate development strategy; the plan seeks to meet the standard methodology, provides for a degree of flexibility in the amount of land released, sets out an appropriate settlement strategy and, generally, distributes growth appropriately through the hierarchy by way of a range of sites including those which are smaller and likely to contribute to a deliverable supply of land. In recognition of the development pressure in Charnwood the plan	There is a typographical error in the references to the policies pertaining to landscape, countryside, green wedges, and areas of local separation; and to the Charnwood Forest ad National Forest. This will be amended in the next draft of the local plan.
	also recognises the value of the countryside and, again, in general terms, seeks to prevent coalescence and to protect settlement identity through the designation of Areas of Local Separation.	

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	For clarity, we are supportive of this strategy and Cossington being identified as an Other Settlement, capable of meeting the day to day needs of its residents. We also comfortable with the amount of development that is distributed to the Other Settlements and agree that the allocation at HS66 Land Rear of Derry's Garden Centre is appropriate and justified. In principle, we also agree that there is merit in protecting the land between Sileby and Cossington as an Area of Local Separation. The only matter between the Council and our client relates to the boundary of the allocated site and the number of homes identified by the policy as it relates to the site boundary and the Area of Local Separation (ALS4).	
	CONCLUSION The Draft Charnwood Local Plan 2019-2036 sets out an appropriate development strategy through Draft Policy LP1; the plan seeks to meet the standard methodology, provides for a degree of flexibility in the amount of land released, sets out an appropriate settlement hierarchy and, generally, distributes growth appropriately through the hierarchy by way of a range of sites including those which are smaller and likely to contribute to a deliverable supply of land.	
	It might be noted that Draft Policy LP1 references Policy LP18, rather than LP19 for Landscape, Countryside, Green Wedges and Areas of Local Separation.	
EDCLP/98 Marrons on behalf of Hallam Land Management Ltd	The development strategy contained in the Draft Charnwood Local Plan is based upon a sensible assessment of services and facilities and resultant settlement hierarchy. The strategy proposes to meet the need for homes with a margin for flexibility, including the provision of 945 homes at Other Settlements. The strategy also recognises that as settlements grow there is pressure on open land and impacts on the separation and identity of settlements. It is our view that in general terms the Draft Plan sets out an appropriate development strategy; the plan seeks to meet the standard methodology, provides for a degree of flexibility in the amount of land released, sets out an appropriate settlement strategy and, generally, distributes growth appropriately through the hierarchy by way of a range of sites including those which are smaller and likely to contribute to a deliverable supply of land. In recognition of the development pressure in Charnwood the plan also recognises the value of the countryside and, again, in general	Noted – support is welcomed

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	terms, seeks to protect settlement identity including through the designation of Areas of Local Separation. For clarity, we are supportive of this strategy and Queniborough being identified as an Other Settlement, capable of meeting the day to day needs of its residents. We also comfortable with the amount of development that is distributed to the Other Settlements and agree that the allocation at HS72 Threeways Farm is appropriate and justified. In principle, we also agree that there is merit in protecting the land between Queniborough and East Goscote as an Area of Local Separation. The only matter between the Council and our client relates to the boundary of the allocated site and the Area of Local Separation (ALS9).	
	CONCLUSION The Draft Charnwood Local Plan 2019-2036 sets out an appropriate development strategy through Draft Policy LP1; the plan seeks to meet the standard methodology, provides for a degree of flexibility in the amount of land released, sets out an appropriate settlement hierarchy and, generally, distributes growth appropriately through the hierarchy by way of a range of sites including those which are smaller and likely to contribute to a deliverable supply of land. The Draft Plan identifies Queniborough as an Other Settlement, capable of meeting the day to day needs of its residents. An appropriate amount of development is distributed to the Other Settlements and the allocation through Draft Policy LP3 Housing Sites at HS72 Threeways Farm is appropriate and justified.	
EDCLP/118 WDA Planning	The site identified on the attached plan is the subject of a live planning application - ref P/19/0813/2 which proposes the erection of a single dwelling with a biodiversity garden. The proposal has been considered by the Plans Committee (August 2019) which has indicated it could take a positive position on the matter subject to the resolution of a limited number of matters. The Committee resolved " that the application be deferred to allow the applicant, officers and other partners to work together to resolve outstanding matters in relation to the tree and hedgerow survey, ecology mitigation and a Section 106 agreement in relation to the use of public land." That joint working is well underway and the application will be reported back to Plans Committee early in the New Year. The application proposal is the subject of a full consultation response from the CBC Conservation and Design Team - as	Noted – the draft local plan does not pre-determine the decision-making on the pending application. The limits of development boundaries will be reviewed to ensure there are no unintended errors.

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	attached. The Team gives a full reasoned assessment as you will see and concludes that "In summary, it is considered that the application does not cause harm to the designated heritage asset and, overall, it is considered that it will enhance the character and appearance of the Conservation Area." The draft Local Plan includes a proposal to revise the limits to development in this part of the village. Given the above, it is considered that this is not justified and a holding objection is recorded pending the decision on the application.	
EDCLP/121 Marie Birkinshaw	Important to somehow engage all local people in the vision of green infrastructure and nature connection, as the increasing urbanisation levels across the country and here in Charnwood are surreptious, often not fully appreciated and its impact is often unknown to many. People generally risk becoming less and less connected with the natural world despite our complete dependence on it.	Noted – the development strategy aims to ensure that the most environmentally sensitive areas will be protected.
EDCLP/125 Tim Birkinshaw	Urban sprawl, merging of settlements, and poor use of building land should be resisted.	Noted – the development strategy aims to ensure that the most environmentally sensitive areas will be protected.
EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	In general, we support the approach of urban concentration and intensification. Whilst we support the principle of protecting the most sensitive and important areas of the countryside, Policy LP1 should also recognise the contribution which developments can make to improving the quality and quantity of accessible countryside, and ensuring its long-term protection. This level of understanding can only be achieved through fine-grained analysis and understanding of individual sites, recognising broad areas of countryside can still accommodate appropriately designed development. The policy should also not seek to circumvent the NPPF's presumption in favour of sustainable development, in the event of a proven shortfall in the supply of homes. The pattern of development contained within the policy should be seen as a target, and it is beneficial to confirm the broad split of housing between different locations, but it is very unlikely that the precise share of housing provision will be maintained over the plan period. It therefore would be completely inappropriate to resist development on the basis of this share of housing provision if the Local Plan is failing to meet its housing requirements.	The Council considers that Draft Policy LP1 is in conformity with the NPPF. Draft Policy LP1 provides the flexibility that development proposals which accord with the overall vision of the plan are likely to be approved where a five-year supply of homes cannot be demonstrated.
EDCLP/145 Infraland	The Council has consistently identified Rothley as a Service Centre and we are pleased to see this continue in Draft Policy LP1.	Noted – support is welcomed.
	Having read the Charnwood Settlement Hierarchy Assessment	

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EDCLP/143 CPRE Leicestershire and its Charnwood District Group	March 2018 it is apparent that the level of services and facilities available at Rothley are similar to those at the other service centres and in some cases superior. Although no Doctors Surgery is recorded in Rothley we are of course a short distance away from the two surgeries in Mountsorrel. We believe Rothley has the services and facilities available to meet most of the day to day needs of residents and good accessibility to services not available within the settlement (Table 3: Proposed Settlement Hierarchy) and we see no case to move the village to a lower level in the hierarchy should there be opposition to Draft Policy LP1. The Council's last plan, the Core Strategy 2015, did not allocate any land in the service centres. Draft Policy LP1 places some 2,490 homes at the Service Centres and we support that as part of the pattern of development. In summary, we consider that the Draft Plan provides the basis for a sound local plan under the terms of the National Planning Policy Framework. We agree with the development strategy, settlement hierarchy and distribution of growth set out in Draft Policy LP1. As statements of intent, we support most of what is set out in Draft Policy LP1 and accept that it provides a useful framework and agenda for considering new development. However we are sceptical about how far these policy intentions will be implemented in the face of conflicting demands and pressures for development. In practice, how far will environmentally sensitive areas, the intrinsic character of the countryside, green spaces and corridors for nature be protected and enhanced? Equally, how far will travel by car remain the predominant mode of travel from new developments despite measures to encurage the use of public transport and will measures to mitigate climate change be effective? These and other concerns will be elaborated in answer to questions below. In addition, as indicated in answer to Q3 and Q4 above, we have reservations about the numbers and distribution of new homes to different parts of t	The policy framework in the draft local plan provides the mechanisms to deliver sustainable development, where local needs are met and the impacts on the environment are mitigated. There is a typographical error in the references to the policies pertaining to landscape, countryside, green wedges, and areas of local separation; and to the Charnwood Forest ad National Forest. This will be amended in the next draft of the local plan.
Hoton Parish	The implementation of the spatial strategy is supported.	Noted – support is welcomed.

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Council EDCLP/152 Adam Murray Andrew Granger & Co Ltd obo landowner clients	Furthermore, we raise objection to the proposed Limits to Development for Thurcaston identified on the draft Policies Map as part of Draft Policy LP1. The Settlement Limits to Development Study (March 2018) states that the Limits to Development will, where possible, follow defensible boundaries and will include existing commitments for built development (implemented and unimplemented planning permissions). It is our view that the draft Limits to Development for Thurcaston fails to achieve both of these objectives. Firstly, the proposed boundary fails to reflect the existing planning permission granted off Leicester Road [LPA Ref: P/18/1241/2] as shown outlined in red in Figure 3 below. In view of both the above planning permission, and the objective to follow defensible boundaries where possible, we consider Rothley Brook to be the natural and most defensible boundary for the village and would appropriately reflect the pattern of development. As such, we propose the inclusion of the land to the west of Anstey Lane within the Limits to Development for Thurcaston.	Noted – the draft local plan does not pre-determine the decision-making on the pending application. The limits of development boundaries will be reviewed to ensure there are no unintended errors.
EDCLP/163 Liz Hawkes Anstey Parish Council	Anstey is a designated as one of six 'Service Centres' within the document and the Parish Council notes the housing proposal included with the Local Plan. APC NOTES the housing requirements for Anstey, with a total housing requirements of 2,490 across the six Charnwood area Service Centres. The village of Anstey has received considerable development over the last few years and the Parish Council AGREE that the new development should be timed and staged to allow for the necessary infrastructure and services to be in place to support a growing community before new houses are built. The Parish Council further agrees that there needs to be development with good access, transport links and respect for the village setting. APC further notes that part of the Parish is also included in the "Leicester Urban Area" target of 7056 homes up to 2016. Anstey PC agrees with the proposal in Draft Policy LP1 that "	Noted – Anstey is an important Service Centre for the borough.
EDCLP/165 Dr S.J.Bullman	Draft Policy LP1: See answer to Q4 "The overall spatial strategy for Charnwood, between 2019 and 2036, is urban concentration and intensification."	The overall spatial strategy is one of urban concentration and intensification.

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	See also answer to Q4. 0.1% of the total required being accommodated by Small Villages/Hamlets is disproportionately small. Freezing out all small village/Hamlet development by area designation should be rethought, to enable SUITABLY SMALL development to take place as in the proposed small 1ha areas policy.	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the
		Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/178 Mark Rose Define obo Bloor Homes	The NPPF no longer uses the language of seeking to protect the countryside simply because it is countryside. Instead, in trying to balance the need for development, it refers to recognising (in both plan making and decision taking) the intrinsic character and beauty of the countryside (para 170 (b)) and it also emphasises the importance of supporting thriving rural communities within it. As such, it does not preclude development in the countryside and it is entirely inappropriate for the CLP to seek to do so. Furthermore, the imposition of a pre-NPPF style "blanket" protection of the countryside and constraint on development outside of tightly defined limits to development around settlements, effectively removes any flexibility to embrace potential sustainable development opportunities as they arise and where there may be wider socio-economic benefits that outweigh any harm, or where that harm can be appropriately mitigated. Indeed, it would have the effect of preventing other sustainable development opportunities coming forward to address shortfalls in provision that are likely to materialise as elements of the anticipated land supply are delayed or do not come forward at all. That is contrary to the requirement of the NPPF's presumption in favour of sustainable development (para. 11), which requires the Local Plan to be sufficiently flexible to adapt to rapid change.	 The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. As such, the policy framework provided by Draft Policy LP1, and Draft Policy LP19 ensure that the overall development strategy can be achieved.
	balance" that is intended to provide an effective short-term remedy in circumstances where there is not a demonstrable 5 year land	

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	REPRESENTATION SUMMARY supply and/or key policies are "out of date" (para. 11). The references to "protecting" the countryside should, therefore, be removed from Policy LP1 (and Policy LP19 too). Moreover, the implementation section of the policy must be revised to clarify that in the circumstances of a shortfall in the Borough's housing supply, the Limits to Development and countryside policy designation will not in themselves be determinative in the consideration of applications for otherwise sustainable development. The NPPF no longer uses the language of seeking to protect the countryside simply because it is countryside. Instead, in trying to balance the need for development, it refers to recognising (in both plan making and decision taking) the intrinsic character and beauty of the countryside (para 170 (b)) and it also emphasises the importance of supporting thriving rural communities within it. As such, it does not preclude development in the countryside and it is entirely inappropriate for the CLP to seek to do so. Furthermore, the imposition of a pre-NPPF style "blanket" protection of the countryside and constraint on development outside of tightly defined limits to development around settlements, effectively removes any flexibility to embrace potential sustainable development opportunities as they arise and where there may be wider socio-economic benefits that outweigh any harm, or where that harm can be appropriately mitigated. Indeed, it would have the effect of preventing other sustainable development opportunities coming forward to address shortfalls in provision that are likely to materialise as elements of the anticipated land supply are delayed or do not come forward at all. That is contrary to the requirement of the NPPF's presumption in favour o	OFFICER RESPONSE The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. As such, the policy framework provided by Draft Policy LP1, and Draft Policy LP19 ensure that the overall development strategy can be achieved.
	in the circumstances of a shortfall in the Borough's housing supply,	

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EDCLP/180 Alex Prowse Astill Planning Consultants obo Mr Fothergill	 the Limits to Development and countryside policy designation will not in themselves be determinative in the consideration of applications for otherwise sustainable development. Question 6 seeks comments on Draft Policy 1 which sets out the proposed development strategy for the Borough. The Local Plan seeks to make provision for at least 19,716 new homes between 2019 and 2036. Draft Policy LP 1 sets out the proposed settlement hierarchy that will be used to guide the location of this growth. Ratcliffe on the Wreake is identified as a 'Small Village and Hamlet' in Table 3 (Charnwood Proposed Settlement Hierarchy). Draft Policy LP 1 only directs 23 of the 19,716 new homes to 'Small Villages and Hamlets'. The equates to 0.1% of the overall supply. What is more, Table 4 (Preferred Development Strategy 2019-36) highlights that all 23 of these homes will come from existing planning permissions and allocations. This suggests that the plan does not make provision for any additional residential development that may need to take place in the Small Villages and Hamlets to retain their vibrancy and vitality during the extended plan period to 2036. This contrasts with paragraph 4.39 of the Draft Local Plan which explains that part of the Council's preferred development strategy aims to support "the vitality and viability" of the Borough's "most rural communities". It is therefore considered that the opportunities for delivering small scale housing developments on suitably located sites within, or immediately adjacent to, the Small Villages and Hamlets should be explored in more detail to ensure that the Local Plan is able to support these areas over the plan period. Furthermore, making provision for several small-scale housing schemes in these villages may help to tackle any rural affordability issues that could arise over the plan period and may help to meet the needs of younger residents who wish to remain in these villages. Given that the site is located adjac	The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. As such, the policy framework provided by Draft Policy LP1, and Draft Policy LP19 ensure that the overall development strategy can be achieved. Furthermore, the policy framework provided by Draft Policy LP1, Draft Policy LP19, and Draft Policy LP5 allows for new development to come forward that meets local needs.

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	reconsider their proposed approach towards residential allocations in the Small Villages and Hamlets and seek to allocate some small sites in these settlements, such as the site in question, for residential development.	
	Reconsidering the development strategy in this way would not result in the overall concentration of development being diverted away from the key urban centres. This is because it would only require several small sites in the Small Villages and Hamlets to be allocated for small-scale development. It is therefore considered that this suggested amendment to the development strategy could take place without prejudicing or compromising the Council's proposed overarching development strategy for the Borough.	
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic	The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The proposals to direct development to the more sustainable Rural Centres including Rothley are supported.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
Land	The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to provide for an increased level of housing growth to deliver socio-economic benefits, provide for at least a 20% buffer, and more realistic assumptions on delivery from SUEs. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations are minimum requirements.	The expected scale of delivery in the SUEs is underpinned by the planning applications that are currently progressing, and the Statements of Common Ground that have been prepared by the Council and the promoters.
EDCLP/189 Alan Siviter Pegasus on behalf of Singh Family	My clients the Singh Family, the occupants of 380 Bradgate Road, Newtown Linford, LE6 0HA wish to object to the proposed Limits to Development around the settlement of Newtown Linford proposed in the Draft Charnwood Local Plan (2019 – 2036). The objection relates to draft policies LP1 and LP19. In summary, the Limits to Development need to be extended on the eastern edge of the village to incorporate the residential curtilage of 380 Bradgate Road, Newtown Linford. The dwelling is clearly located within the settlement of Newtown Linford and provides a clearly defined edge to the built form of the settlement. The dwelling is a gateway location into the settlement.	Noted – The limits of development boundaries will be reviewed to ensure there are no unintended errors.
	Reference should be made to the 2016 Green Wedges and GI assessment by ARUP that includes the review of all Area of Local Separation (Annex A page 152). The summary contained within the document states:	

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CONSULTEE	"Area of Local Separation M (ALS-M) lies between Anstey and Newtown Linford. The parcel is situated on the eastern edge of Newtown Linford and on the north-western edge of Anstey. Bradgate Road cuts across the centre of the area. Ribbon development along Bradgate Road adjoins the eastern and western boundaries. The area is bounded by countryside to the north and south."	
	Following the recent review, the assessment confirms that 380 Bradgate Road is not located within the Area of Local Separation (specifically ALS13 Anstey to Newtown Linford) as it clearly does not offer the appropriate value to qualify, being an already developed parcel of land. Areas of Local Separation are areas of open countryside that separate two neighbouring settlements. Their main purpose is preserving settlement identity, and they are based on landscape character, the visual appearance of the area and maintaining landscape connectivity.	
	By not identifying the site as an Area of Local Separation it would suggest that ALS13 identifies 380 Bradgate Road as part of the settlement of Newtown Linford, and therefore should be incorporated into the limits to development for the settlement. It is unclear as to why the settlement boundary assessment contradicts the preceding evidence prepared by professional consultants on behalf of Charnwood Borough Council.	
	If the site is not an ALS but is located on the edge of the settlement, and is a developed property, why is it not included in the settlement boundary? It is considered that the findings of the recent settlement boundary assessment are misguided and contradicts the evidence base of Charnwood Borough Council.	
	Respectfully, it is requested that the Limits to Developments at Newtown Linford are re-evaluated and redrawn to incorporate 380 Bradgate Road as shown below in Figure 1, to be consistent with Policy ALS13 (Area of Local Separation).	
	If in the meantime you require any further information, please do not hesitate to contact me on the details listed below.	
	Figure 1 – Proposed Revision to the Newtown Linford Limits to Development [Image available]	

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EDCLP/205 Guy Longley Pegasus obo Davidsons Development Ltd	The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The proposals to direct development to the more sustainable larger settlements including Anstey are supported. We have commented above that Anstey should be considered an	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
(Anstey)	Urban Centre functionally well related to the Leicester Urban Area.	The overall spatial strategy is one of urban concentration and intensification.
	We have commented already on the need for greater flexibility in the plan and the need for the Council to provide for an increased level of housing provision to provide a better balance between the social and economic benefits of growth and potential environmental impacts. We have also commented that the distribution strategy does not make best use of the opportunities for sustainable growth at the Service Centres and the need for some of the growth	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	proposed to be directed to Shepshed and the less sustainable Other settlements to be re-directed towards the Service Centres.	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to provide for an increased level of housing growth to deliver socio-economic benefits, provide for at least a 20% buffer, make more realistic assumptions on delivery from SUEs, with further provision being made in the Service	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 1,000 new dwellings allocated to Service Centres) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Centres to make best use of the available opportunities for sustainable growth. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations are minimum requirements.	The expected scale of delivery in the SUEs is underpinned by the planning applications that are currently progressing, and the Statements of Common Ground that have been prepared by the Council and the promoters.
EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd	The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The proposals to direct development to Other Settlements such as Wymeswold are supported.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
(Wymeswold)	We have commented already on the need for greater flexibility in the plan and the need for the Council to provide for an increased	The overall spatial strategy is one of urban concentration and intensification.
	level of housing provision to provide a better balance between socio-economic benefits of growth and potential environmental impacts. We also consider that the distribution strategy does not make best use of the opportunities for sustainable growth at the Other Settlements and the need for some of the growth proposed to be directed to Shepshed and the less sustainable Other	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.

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	settlements to be re-directed towards the more sustainable Other Settlements (see Q8 below). The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to provide for an increased level of housing growth to deliver socio-economic benefits, provide for at least a 20% buffer, and more realistic assumptions on delivery from SUEs, with further provision being made in the Service Centres and the more sustainable Other Settlements to make best use of the available opportunities for sustainable growth. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations are minimum requirements.	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 1,000 new dwellings allocated to Service Centres) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The expected scale of delivery in the SUEs is underpinned by the planning applications that are currently progressing, and the Statements of Common Ground that have been prepared by the Council and the promoters.
EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Field Head)	The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The proposals to direct development to settlements well related to the Leicester Urban Area is supported. The Hinckley and Bosworth Core Strategy identifies Markfield and Field Head as a Key Rural Centre relating to Leicester. The Council, in identifying opportunities for growth in settlements well related to Leicester, should have also considered the potential for development on land within Charnwood adjoining Markfield and Field Head.	The Council acknowledges the submission of the site "Land South of Markfield Lane, Field Head". This site already features within the SHELAA, but the additional information will be reviewed and considered as part of the next stage of the draft local plan. The Council has been in dialogue with Hinckley and Bosworth, and will be preparing a Statement of Common Ground on joint issues.
	We have commented already on the need for greater flexibility in the plan and the need for the Council to provide for an increased level of housing provision to provide a better balance between socio-economic benefits of growth and potential environmental impacts. We also consider that the distribution strategy does not make best use of the opportunities for sustainable growth at the Other Settlements and the need for some of the growth proposed to be directed to Shepshed to be re-directed towards the more sustainable Other Settlements (see Q8 below).	
	LP 1 needs to be amended to provide for an increased level of housing growth to deliver socio-economic benefits, provide for at least a 20% buffer, and more realistic assumptions on delivery from SUEs, with further provision being made in the Service Centres and	

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	the more sustainable Other Settlements to make best use of the available opportunities for sustainable growth. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations are minimum requirements.	
EDCLP/209 Amy Smith Pegasus obo Jelsons	Draft Policy LP 1 outlines the overall spatial strategy for the Borough over the plan period to 2036 as being one of urban concentration and intensification. It sets out proposals to provide for at least 19,716 homes and includes a table setting out the proposed distribution. The proposal to focus growth on	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
	Loughborough as the most sustainable urban centre in the Borough is supported. This should be identified as the primary location for growth in the Table included in the Policy in accordance with the	The overall spatial strategy is one of urban concentration and intensification.
	settlement hierarchy set out in Table 3 at page 22. In our response to Questions 3a and 3b above, we have commented on the Council's proposal to pursue a low growth strategy and to make an additional provision for some 1,300 homes to provide flexibility in the plan.	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	The Council should provide for an increased level of housing provision to provide a better balance between the social and economic benefits of growth and potential environmental impacts.	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	They should also make provision for at least a 20% buffer to ensure sufficient resilience in the plan to deal with changing circumstances. We have also questioned the assumptions on delivery from the larger SUEs and the scale of development proposed to be directed towards Shepshed.	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option (with 1,000 new dwellings allocated to Service Centres) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	The Table should make it clear that the number of homes directed to different locations are minimum requirements.	The expected scale of delivery in the SUEs is underpinned by the planning applications that are currently progressing, and the Statements of Common Ground that have been prepared by the Council and the promoters.
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	In general, we support the approach of urban concentration and intensification. Whilst we support the principle of protecting the most sensitive and important areas of the countryside, Policy LP1 should also recognise the contribution which developments can make to improving the quality and quantity of accessible	Noted – the distribution strategy is predicated on the analysis in the SA, which shows the Hybrid options is the is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	countryside, and ensuring its long term protection. This level of understanding can only be achieved through fine-grained analysis and understanding of individual sites, recognising broad areas of countryside can still accommodate appropriately designed development. Similarly, a full and detailed assessment of all sites is	Draft Policy LP1 allows for flexibility in considering proposals which align with the overall vision in those circumstances where a five-year housing land supply position cannot be demonstrated.

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	required in order to ensure that the number of homes proposed are deliverable through a rigorous understanding of technical matters including access as well as environmental matters.	
	The policy should also not seek to circumvent the NPPF's presumption in favour of sustainable development, in the event of a proven shortfall in the supply of homes. The pattern of development contained within the policy should be seen as a target, and it is beneficial to confirm the broad split of housing between different locations, but it is very unlikely that the precise share of housing provision will be maintained over the plan period. It therefore would be completely inappropriate to resist development on the basis of this share of housing provision if the Local Plan is failing to meet its housing requirements.	
EDCLP/219 Lynsey Reid Burges Salmon LLP on behalf of Mr Proctors	We act on behalf of Mr Proctor, the owner of Queniborough Old Hall (the "Old Hall"). We have been instructed to submit a response to Charnwood Borough Council's (the "Council") consultation on the draft Charnwood Local Plan 2019-36 (the "Draft Plan"). Responses are invited by 16 December, and this response is therefore submitted in time.	Noted – The proposed change to the limits of development do set Queniborough Old Hall outside of the new limits of Queniborough. The limits of development boundaries will be reviewed to ensure there are no unintended errors in the drawing of the limits.
	Our client has serious concerns with the limits to development proposed for Queniborough, and requests that the Draft Plan is amended around the curtilage of Old Hall, to retain the existing limits to development, and to retain the Old Hall within the settlement boundary. The reasons for the requested amendment are set out below.	
	We would note at the outset that our client as landowner was not consulted on the proposals that directly affect their property. This is contrary to guidance in the UK Government's Planning Practice Guidance, which states: "At an early stage in the plan-making process strategic policy- making authorities will need to work alongside infrastructure providers, service delivery organisations, other strategic bodies such as Local Enterprise Partnerships, developers, landowners and site promoters. A collaborative approach is expected to be taken to identifying infrastructure deficite and requirements.	
	identifying infrastructure deficits and requirements, and opportunities for addressing them." (emphasis added) Paragraph: 059 Reference ID: 61-059-201 9031 5	
	SETTLEMENT BOUNDARY	

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	The Draft Plan The Old Hall is located within the limits to development for Queniborough (the "Settlement Boundary"), as delineated in the current focal Plan (2004). The Draft Plan's policies maps 1 and 2 (the "Policies Maps") are included at Appendices B and C of the Draft Plan. The proposed Settlement Boundary on the Policies Maps intends to remove the Old Hall from the Queniborough village settlement. Exclusion of the Old Hall from the Settlement Boundary means that it is now subject to the "countryside" designation, which is applied on a blanket basis to all land within the Council's administrative area which is not otherwise allocated.	
	Paragraphs 4.37 — 4.39 of the Draft Plan state: `The Policies Map shows our preferred settlement Limits to Development for the majority of settlements in the Borough. These boundaries define the cohesive built form of settlements, taking account of development allocations made, and make them distinct from the countryside. Countryside is the largely undeveloped /and beyond the defined Limits to development of our towns and villages and has its own intrinsic character and beauty. The Limits to Development, and by extension the edge of the countryside, are an integral part of our development strategy to guide development to sustainable locations. Our preferred strategy is to protect the intrinsic character of the countryside whilst supporting the vitality and viability of our most rural communities." (emphasis added)	
	Draft Policy LP1 states: "We will support sustainable development within defined Limits to Development and in the allocations defined in this plan	
	Environment Areas designated as Countryside are identified on the Policies Map. These designations are an integral part of the spatial strategy that has been identified to deliver growth in the context of the objective to conserve and protect the character of our towns and villages and the intrinsic character and beauty of the countryside. Development proposals which do not accord with Draft Policies LP18 Landscape, Countryside, Green Wedges and Areas of Local Separation and LP19 Charnwood Forest and National Forest will not be in accordance with the spatial strategy as set out in this	

policy.

Implementation of Spatial Strategy

Development proposals which do not accord with the pattern of development in the spatial strategy will not be considered compatible with the vision and will not meet the objectives of the plan and as a result will not be supported, even where there is a proven shortfall in the supply of homes. Proposals for development which are not allocated in this local plan but accord with the vision, pattern of development and other requirements of this policy are likely to be approved where a five year supply of homes cannot be demonstrated. In all other circumstances, new built development will be confined to sites allocated in this plan and neighbourhood plans, and other land within the Limits to Development subject to specific exceptions in this plan."(emphasis added)

Paragraph 7.8 of the Draft Plan states: "Countryside has an important role in providing the landscape setting to our settlements and understanding our landscape helps us to understand and maintain settlement identity."(emphasis added)

Draft Policy ~P19 states:

"We will carefully manage development to protect the countryside's intrinsic character and beauty by:

• requiring new development to protect landscape character and to reinforce sense of place and local distinctiveness by taking account of relevant local Landscape Character Assessments;

• requiring new development to maintain the separate identities of our towns and villages;

• supporting rural economic development or residential development which has a strong relationship with the operational requirements of agriculture, horticulture, forestry and other land based industries;

• supporting development for the reuse and adaptation of rural buildings and small scale new built development where there would not be significant adverse environmental effects;

• supporting the provision of community services and facilities that meet proven local needs as identified by a neighbourhood Plan or other community led plan; and

 supporting rural communities by allowing new housing development for local needs in accordance with Draft Policy LPS."(emphasis added)

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	The Draft Plan does not include any explanation of changes to the character of Queniborough village that have prompted the proposed change in Settlement Boundary and removal of the Old Hall from the village.	
	Queniborough Old Hall The exclusion of the Old Hall from within the Settlement Boundary is inappropriate, given the Old Hall's location and historic significance within the Queniborough village settlement. The Old Hall is a substantial residential property that has historically formed part of the settlement of Queniborough. There have been no material changes to the property itself or surrounding area that would justify or necessitate the removal of the property from the Settlement Boundary. Indeed, the most recent relevant change (effective from earlier this year) has been to include the Old Hall within the Queniborough Conservation Area, which would suggest it is appropriate to retain the Old Hall within the Settlement Boundary.	
	Consultation was carried out in early 2019 to re-evaluate the boundaries of the Queniborough Conservation Area. The Council's `Queniborough Conservation Area: Boundary Review' document notes that it is clear from review of OS maps dating from 1883, 1903, 1930 and 1956 that "the current CA boundary includes all of the historic village buildings —except the Old Hall "and notes "the location of the Queniborough old and New Halls and their parklands at either end of the CA" (page 14). The document proposed the addition of the Old Hall to the Conservation Area based on its "significant heritage value".	
	The Council's `Queniborough Conservation Area: Character Appraisal', was thereafter revised in 2019 to reflect the updated boundaries, including the addition of the Old Hall. The Character Appraisal notes that, while there are a number of Listed Buildings within the Conservation Area, there are five that are `key' and "have a stronger influence on the character of the Area" (page 16) —the Old Hall is identified as one of these key buildings.	
	Given the identification of the Old Hall as a key Listed Building within Queniborough village, exclusion of the Old Hall from the Settlement Boundary ignores the historical significance of the Old	

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	Hall as part of the village. It is oxymoronic to extend the Queniborough Conservation Area to include the Old Hall whilst at the same time redrawing the Settlement Boundary to exclude the same property. At the very least, an explanation for this apparently contradictory approach is required.	
	The Appraisal notes that the `special interest' of the Queniborough Conservation Area is the village's location and setting. It notes, "Queniborough is a village at the edge of the Wreake Valley. It is a gateway to the area of relatively undeveloped landscape known as High Leicestershire The Conservation Area incorporates the whole of the vil/age as it was from Mediaeval times until the end of the 19~h Century" (page 7) (emphasis added)	
	The Character Appraisal notes that that current Old Hall "was rebuilt and enlarged in 1672 by the Bennett family although it would appear that this was done using the original footings as the Hall still takes the form of the original medieval `H' plan house" (page 19). The current Old Hall has been part of the village settlement for almost 350 years, and the site has been part of the village since the original house was built in 1354, 665 years ago.	
	Old Hall is closer to many of the village facilities (primary school, pub and local shops) than much of the newer part of the village, which is within the Settlement Boundary.	
	Assessment of the Draft Plan in relation to Queniborough Old Hall. Given the Old Hall's status as an enduring building of key influence within Queniborough, it is considered that it forms part of the "cohesive built form" of the Queniborough settlement, which should be retained within the Settlement Boundary. The Old Hall certainly does not form part of the "distinct' and "largely undeveloped" countryside (see paragraph 1.4 above and paragraphs 4.37 — 4.39 of the Draft Plan).	
	In terms of draft Policy LP1 (see paragraph 1.5 above), the Old Hall is an important aspect of the Council's objective to "conserve and protect the character of Queniborough. Paragraph 7.8 of the Draft Plan (see paragraph 1.6 above) states that the countryside's importance is in "providing the landscape setting to our settlements". The Old Hall is itself clearly considered by the Council to be an important part of the Queniborough settlement, given its	

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	inclusion within the Conservation Area. The Old Hall is physically distinct from the countryside, with Queniborough Brook forming a long established, natural and robust settlement boundary. This was recognised in the recent Conservation Area Appraisal. Peggs Lane Cottages have been retained within the proposed Settlement Boundary. That property historically was in the same ownership as, and served, Old Hall. The two properties remain physically connected. The proposed changes would see the settlement boundary cut between these properties, creating an unnatural and therefore weakened settlement boundary compared to the existing position.	
	Draft Policy LP19 seeks to "protect the countryside's intrinsic character and beauty by requiring new development to maintain the separate identities of our towns and villages". It is clear from the Conservation Area Character Appraisal that the Old Hall is part of the village of Queniborough's identity, and should not be separated from it.	
	CONCLUSIONS The exclusion of the Old Hall from the Settlement Boundary has not been properly explained or justified. An explanation for the contradictory approach taken in relation to the Queniborough Conservation Area boundary is required.	
	For the reasons set out in detail in this letter, we would request that the Limits to Development for Queniborough in the Draft Plan's Policies Map are redrawn to retain Queniborough Old Hall within the settlement boundary.	
	We look forward to hearing from you, and would ask to be kept informed of any further developments in relation to the draft Charnwood Local Plan 2019-36.	
EDCLP/221 Nick Baker Lichfields on behalf of CEG	The Council has identified a need for 18,394 homes (1,082 a year) between 2019 and 2036, calculated using the standard method set out in National Planning Practice Guidance. CEG supports the proposed approach to carrying forward the existing housing	The proposed SUE / Thorpebury development is a corporate priority and is a central component of the draft local plan and the overall development strategy.
	proposals from the Core Strategy, take account of existing commitments and make provision for a further 7,252 homes over the plan period to 2036.	A housing trajectory for all sites, including Thorpebury will be developed for the next draft of the local plan.
	We note that the Council anticipates approximately 70% of the 275	The Council looks forward to preparing and signing a Statement of Common Ground with CEG to agree the delivery timetable for

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	identified housing need will be met through existing site allocations and approved planning permissions, with the three SUEs accounting for the majority of this housing supply. As the largest of the SUEs, Thorpebury will play a significant role in meeting housing needs up to 2036 and beyond.	Thorpebury.
	Whilst CEG welcomes the acknowledgement of this contribution to meeting housing needs at para 4.10 (and elsewhere), the Local Plan should include a greater emphasis on supporting the delivery of these significant strategic sites. It will be important to consider the impact of any additional development in terms of timing and location if allocating additional housing allocations in the area to the	
	north of Leicester, to avoid an adverse impact on existing and upgraded infrastructure and services in the area, and to support the delivery of already permitted new homes in a sustainable location. The phasing and timing of any new housing allocations close to Thorpebury must also be carefully planned to seek to manage any adverse impact on the marketing of the existing and permitted	
	allocation as this could materially affect the viability and delivery rates achieved from this established strategic site.	
EDCLP/223 lan Long Boyer Planning on behalf of	The emerging Local Plan states that by 2036 the economic needs of the Borough's communities will be met through delivering up to 77.88 hectares of land for employment purposes through the allocation of 8 sites. As is noted in emerging Policy LP1, the	Noted – Draft Policy LP1 and Draft Policy LP12 provide the policy framework to achieve the employment land required to help support the Council's economic objectives.
Rotherhill Developments Ltd	majority of this land will be delivered as part of Sustainable Urban Extensions and the Watermead Regeneration Corridor with a smaller proportion within and adjoining 'Service Centres' and 'Other Settlements'.	The evidence for the quantum of land set out in the policies comes from the Employment Land Review (Peter Brett Associates with Aspinall Verdi, March 2018). Table 7.1 and Table 7.3 set out the employment land needs, along with identified locations for providing land to meet the need. This data has been included in Draft Policy LP12.
	We consider that the Development Strategy as contained in emerging Policy LP1 distributes too great a proportion of employment land to be delivered in Sustainable Urban Extensions over the plan period (to 2036). A total of 44 hectares of	Not all of the locations identified in Draft Policy LP12 are within the SUEs, with land identified in Services Centres and Other Settlements.
	employment land is to be provided by three allocations as part of Sustainable Urban Extensions, which represents a considerable proportion of the overall employment land to be delivered across the Borough.	The Council acknowledges the submission of Land South of Syston Road, Cossington. This site will be assessed through the SHELAA, and the information will be used as an input into the next draft of the local plan.
	Deliverability issues can arise when seeking to bring multiple Sustainable Urban Extensions (SUEs) forward throughout a plan period, and this could have critical implications for employment land supply in the Borough. In the event that one or more of the SUEs	

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	fails to come forward in a timely manner, this could result in the failure to meet market demand for employment uses.	
	The solution to increasing the security of employment land supply is to increase the employment land target and diversify the distribution of sites by allocating a mixture of sites in locations which benefit from strong accessibility to the strategic highway network. We accept that the majority of the employment land needs are to be met through SUEs and the Watermead Business Park, however the inclusion of smaller sites would ensure that the supply is protected from deliverability issues that can arise with SUEs. As such, emerging Policy LP1 should re-distribute an increased quantum of employment land to 'within and adjoining Service Centres and Other Settlements' to reflect an increased diversity of sites being brought forward. Page 2 of 3	
	The 'Employment Land Study' (March 2018), which has formed part of the evidence base for the emerging Local Plan, identifies that 44.5ha of new land is needed for 'local' industrial and small warehouses. As such, there is a clear and demonstrable need for such developments in the Borough and this should be reflected in the Development Strategy.	
	Conclusion We consider that the Development Strategy as contained in emerging Policy LP1, and further described in emerging Policy LP12, should contain an increase in the amount of employment land sought over the plan period which will be delivered across a greater diversity of sites and locations in the Borough, reflective of their accessibility to the strategic highway network and connectivity to the primary urban centres of the region.	
	'Land south of Syston Road, Cossington', as submitted to the SHELAA consultation alongside this Local Plan representation, directly accords with this position and is optimally placed to capitalise upon the economic potential of the A46 Priority Growth Corridor. The site, which can provide in-demand small warehousing units has clear market interest and is not encumbered by any physical constraints that would otherwise prevent development. As such, the site can make a positive contribution towards the Borough's employment land supply in the short-term, providing security to the supply whilst the SUEs come forward over the	

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	course of the plan period.	
EDCLP/226 Eleanor Hood	Developmental strategy. It is important always to include the necessary levels of infrastructure to support the development and you should insist on their inclusion.	The Council is aware of the impact of development on services, facilities, and infrastructure. The impact on infrastructure is considered as part of the SHELAA, IDP, and SA. The Council is working directly with the statutory providers to understand the impacts of development and agree any necessary mitigation measures.
EDCLP/246 Andrew Collis Gladman Developments Ltd	Draft Policy LP1 sets the overall planning strategy for Charnwood over the plan period. To enhance the effectiveness of the policy and connected monitoring of the Local Plan, Draft Policy LP1 should be amended to confirm the housing requirement for the plan period.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
	As set out above in response to Question 3b, Gladman consider that the amount of supply proposed through the Local Plan should	The overall spatial strategy is one of urban concentration and intensification.
	be increased by at least 1,437 dwellings to provide for 15% flexibility in housing land supply to the housing requirement as proposed. Subject to capacity and consistency with other policies of the Local Plan, this additional growth should be distributed proportionately across the settlement hierarchy focused first at existing sites identified for allocation through the draft Local Plan. Gladman consider that land interests at North of Melton Road,	The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	Barrow upon Soar, and Melton Road East Goscote provide two such opportunities at which further development could sustainably be accommodated (see Section 6.1 of this representation for further details).	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option.
	Gladman is concerned about the restrictive approach taken by the Council towards development beyond the settlement boundary. It is considered that a more flexible approach is necessary given the	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	limited surplus in supply planned against the proposed housing requirement, reliance placed on neighbourhood planning to secure delivery at small sites, and pressure likely for development in the Borough in response to cross boundary and long-term housing	Draft Policy LP1 allows for flexibility in considering proposals which align with the overall vision in those circumstances where a five-year housing land supply position cannot be demonstrated.
	needs. Gladman therefore believe that the Council should establish a	The draft local plan does have regard to the SGP, and the overall ambitions (as applied to Charnwood) are reflected in the policy framework of the draft local plan.
	positive policy framework for windfall development to come forward at suitable and sustainable locations adjoined to its named settlements. To guide this, Gladman recommend that the Council	The Council is discharging its duty to co-operate and will be preparing a series of Statements of Common Ground with the relevant statutory
	adopt the approach applied by Ashford Council through Policy HOU5 of the adopted Local Plan. Policy HOU5 applies a criterion- based approach towards windfall proposals enabling an uplift in	authorities to confirm the joined-up approach which has been followed. As noted, proposals for a new settlement have been considered as part
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CONSOLTEE	housing land supply. This is however controlled to ensure that the overall spatial strategy is not undermined or prejudiced, and a sustainable pattern of development is secured. An extract of Policy HOU5 of the Ashford Local Plan is included in Appendix 5 of this representation. Referring more specifically to settlement boundaries, it is noted that few, if any, of the proposed allocations which are currently greenfield in character are included within updated settlement boundaries proposed as a result of the Local Plan. Gladman question the rationale for this approach. Once developed allocated sites will function as part of the wider settlement and are likely to be indistinguishable in character and built form. The approach of the Council creates unnecessary difficulties for future occupiers of these sites where in policy terms new homes/premises will be located within the open countryside. This will significantly restrict what future development can take place in these areas in principle constraining otherwise likely suitable and sustainable development. Gladman consider this approach to be unjustified. The draft policies map should therefore be amended to include all proposed residential and employment allocations made through the Local Plan where well related to existing sustainable settlements unless the overall character of the Site as a result of its development is rural.	of the SA. As written above, the SA has identified that the Hybrid approach represents the is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is in receipt of the additional information for the proposal at Six Hills, and will be considering this additional information as part of the next stage of the draft local plan.
	 Growth Plan (the Strategic Growth Plan) which has been endorsed and adopted by all Leicestershire authorities including Charnwood Borough Council. The Strategic Growth Plan defines how longerterm growth needs and infrastructure requirements should be accommodated in the county to 2050 and as such represents a key part of the sub-regional spatial planning strategy confirming strategic scale cross-boundary issues. As such Gladman consider that an important aspect of fulfilling the Duty to Cooperate for this Local Plan is ensuring that its spatial strategy is adequately prepared and responsive to the issues of the Strategic Growth Plan. At present Gladman is concerned that the Draft Local Plan fails to adequately secure this. Draft Policy LP1 makes no reference to the Strategic Growth Plan, with passing reference made in supporting 	

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	text to support the level of growth proposed for Shepshed. This fails to recognise the significance the Strategic Growth Plan holds for the Borough which is wider ranging than the future development of Shepshed. Gladman consider that the Local Plan should include a series of "broad locations of growth" identified to respond to longer term development needs as set out within the Strategic Growth Plan. These areas could remain as a series of "broad locations for growth" identified on the Key Diagram within the Local Plan with the specific need for and requirements of developing these areas considered through an immediate focused review of the Local Plan. This approach ensures that the Local Plan can be found to be consistent with the longer-term requirements of the Strategic Growth Plan whilst minimising the need to delay advancement of the Local Plan towards adoption. Gladman consider that this approach represents the most pragmatic approach available to the Council to respond to the Strategic Growth Plan given current uncertainties tied to how its strategy will be delivered. It is noted that the Council has very broadly identified and considered several broad locations and new settlements as options as part of the spatial strategy for this plan period through the Sustainability Appraisal (see spatial options A5, B6, and C1 of the SA). The Council is therefore already aware of potential options available within the Borough at which further housing could be accommodated in response to the Strategic Growth Strategy. The awareness of these options will help minimise potential delay to the plan preparation process in responding to this point. One of these opportunities is provided by Six Hills which is being promoted by Gladman. This is briefly examined through spatial option C1 of the SA. Six Hills forms a cross-boundary option for a new settlement located at the A46 strategic corridor. The Strategic Growth Plan makes clear that the A46 fulfils a significant role in facilitating growth and securing investment in Le	
	that it represents an unconstrained location for growth unaffected by flood risk or landscape issues. Its development will not result in	

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	REPRESENTATION SUMMARY pressure on existing services and infrastructure at current settlements within the Borough, with the proposed scale of development for Six Hills providing opportunity for the delivery of new infrastructure to provide for a sustainable and self-contained new settlement. A summary of the work undertaken to date in evidence of the suitability of Six Hills has been prepared and is submitted in Appendix 4 to this representation. Gladman is keen to work with both the Council and Melton Borough Council, as well as other key stakeholders and facilitators in bringing the Site forward as a long-term location for sustainable growth and would welcome further discussion with the Council in relation to the longer-term future potential Six Hills provides. We object to policy LP1 for the following reasons: 1. We consider that Policy LP1 should provide for more than 19,716 new homes, for the following reasons: • The Plan should have a longer timeframe than 2019 – 2036, as explained above. A greater number of new homes would clearly need to be provided for with a longer timeframe and additional housing sites allocated. This would have the advantage of providing the right balance to meet housing needs and also ensure greater flexibility and control, thereby avoiding the Local Plan becoming out of date whilst also protecting Charnwood's environment; • The draft Plan makes insufficient allowance for the requirement for Charnwood to accommodate a proportion of the unmet housing needs of the City of Leicester, as we described above; and • Our assessment of current housing land supply in Charnwood is appended to these representations. It shows that the Council, in stating that it can show over 6 years' housing supply between 2019 and 2024, is over-estimating housing	OFFICER RESPONSE The proposed number of new dwellings set out in the draft local plan fulfils the obligation, set out in the NPPF Paragraph 60, and has been drafted in such a way to comply with the requirements set out in Paragraph 73. A detailed housing trajectory will be provided as part of the next draft of the local plan. The Council is in receipt of the additional information for the proposal at Sileby, and will be considering this additional information as part of the next stage of the draft local plan.
	2. The distribution of new homes set out in Policy LP1 does not represent the most sustainable or deliverable means of	
	accommodating the housing needs being provided for. In particular:	

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	• The Service Centres, including Sileby, have a scale, population and range of services and facilities such that more than 13% of all new homes should be located there; and	
	By definition, the 'other settlements' and 'small villages and hamlets' are less sustainable, being much smaller and having fewer facilities and services, therefore the proposal that they should accommodate over 5% of all new homes is flawed and this proportion should be significantly reduced.	
EDCLP/254 Ian Deverell Turley on behalf of Rainier Developments Ltd)	Given the pressing need to deliver residential development to assist in meeting the unmet needs arising from Leicester City, as expressed in response to Questions 2 and 3a, Rainier do not consider that the proposed spatial strategy and lack of any contribution towards meeting the unmet need is appropriate. Failure to do so risks the plan not meeting the legal Duty to Cooperate.	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/255 Ian Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	Given the pressing need to deliver residential development to assist in meeting the unmet needs arising from Leicester City, as expressed in response to Questions 2 and 3a, Rainier do not consider that the proposed spatial strategy and lack of any contribution towards meeting the unmet need is appropriate. Failure to do so risks the plan not meeting the legal Duty to Cooperate.	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/258 Sam Heaton Heaton Planning on behalf of Swithland Homes Ltd	A full copy of Draft Policy LP1 is attached at Appendix 2 for ease of reference. The pattern of development for new homes in the spatial strategy is "identified based on the balance between social, environmental and economic factors", which Ultimately, affords Service Centres (including Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley and Sileby) a 13% proportion of the overall new homes delivery target.	The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were determined, along with one further option linked to the concept of a standalone new settlement.
	site to the north of Loughborough Road, in conformity with the Quorn Neighbourhood Plan. Heatons previously submitted comments to various stages of consultation during the preparation of the Quorn Neighbourhood Plan, which was made June 2019. Our representations raised concerns regarding the approach taken by the Neighbourhood Plan Group to defining a housing requirement within the Plan, which was derived based upon a	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects,

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	simplistic division of population, with little social, environmental and economic influence. It is noted that the Local Plan does not allocate any additional homes within Quorn, it is considered that one allocation within Quorn does not sufficiently reflect the role of Quorn as a "Service Centre" settlement and its capacity to accommodate further sustainable residential development.	and the greatest significant positive effects.
EDCLP/259 Severn Trent Water Property Development	Draft Policy LP1 (Development Strategy) – Limits to Development Paragraph 4.37 (page 27) of the draft Local Plan states that; "The Policies Map shows our preferred settlement Limits to Development for the majority of settlements in the Borough. These boundaries define the cohesive built form of settlements, taking account of development allocations made, and make them distinct from the countryside"	Noted – the proposed limits to development have been drafted to help deliver the policy intention within the draft local plan – that is, to achieve a spatial strategy of urban concentration and intensification. The Council acknowledges the information provided in this response and will review the proposed limits to development prior to the publication of the next draft of the local plan.
	Draft Policy LP1 then goes on to state that; "The overall spatial strategy for Charnwood, between 2019 and 2036, is urban concentration and intensification. The most environmentally sensitive areas will be protected and the pattern of development will provide a balance between homes, jobs and facilities. We will support sustainable development within defined Limits to Development and in the allocations defined in this plan."	
	Whilst there is no objection to the wording of the draft policy and sub-text, the 'Limits to Development' has been amended so that the MLPL site no longer falls within the Loughborough Settlement Boundary. However, it is considered that the Settlement Boundary should be re-instated to its former position to include the MLPL site for the following four reasons:	
	• The proposed 'Settlement Limit' should, in accordance with Draft Policy LP1, define the cohesive built form of settlements and make them distinct from the countryside. However the MLPL site cannot be described as either 'countryside' in appearance or physically part of the countryside. It is physically separated from the countryside by the adjoining railway line and is also surrounded by existing built development on two sides. Any person standing on this site would therefore not consider that the site is distinct from the built settlement and has its own	
	'intrinsic character and beauty' that makes it form part of the Countryside. Instead it has a closer relationship with the directly adjacent built environment of Loughborough.	

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	 The land to the east of the MLPL site on the opposite side of the railway line is currently outside the settlement boundary and can be considered as countryside. However, the draft Local Plan allocates the majority of this land for open space/ outdoor sports pitches. Whilst outdoor sports facilities would be expected to be open in character, they will 'urbanise' the countryside by introducing structures and supporting facilities such as artificial pitches, floodlights, car parking areas and changing facilities. This will have the effect of moving the countryside further from the MLPL site and adds weight to the argument that the 'Settlement Limit' should be reinstated to the railway line with the allocated outdoor sports areas acting as a transitional buffer between the open countryside and built settlement. The current adopted plan includes the MLPL site within the Settlement Boundary as it has previously been considered that this is the correct approach to take in planning terms. It is not considered that there has been any material change in circumstances since the adoption of the previous local plan that warrants changing the settlement boundary. The site falls within the adopted settlement boundary of Loughborough. The site is therefore accessible by all means of sustainable transport. For example, Loughborough Train Station is located some 1100 metres to the south-east of the site. 	
	In addition to the above, the 'Charnwood Settlement Limits Draft Assessment' published in March 2018 sets out the methodology and two principles that underpinned the revised settlement boundaries that appear in the Draft Local Plan.	
	Principle 1 states that the boundary will tightly define the settlement by enclosing the established, cohesive built form. Where possible it will follow defensible boundaries - distinct features such as walls, watercourses, roads and hedgerows which have a degree of permanence.	
	 Principle 2 states that settlement boundaries will exclude: a) Playing fields or other open spaces at the edge of settlements (e.g. allotments, cemeteries) b) Outlying or isolated buildings or structures which are physically or visually detached from the built form of the settlement. 	

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	 c) Large gardens or other open areas, such as adjacent paddocks and orchards d) Agricultural/farm buildings and their curtilages which are situated on the edge of the settlement. 	
	With regard to Principle 1, the railway line forms a distinct, permanent and defensible boundary that should form the settlement boundary. The currently proposed settlement boundary has no such features and would therefore not be easily defensible.	
	With regard to principle 2, the MLPL site does not fall within any of the criteria that should be excluded from within the Settlement Boundary.	
	For the reasons given above, it is therefore considered that the Settlement Boundary should be contiguous with the railway line directly to the east of the MLPL site.	
	it is considered that the Loughborough Settlement Boundary should remain in it's adopted position contiguous to the railway line and the MLPL site should be allocated for employment use. These modifications, if adopted, would provide a valuable employment opportunity for the Loughborough East Priority Neighbourhood Area whilst having little impact on the intrinsic beauty of the countryside that surrounds Loughborough.	
EDCLP/257 West Leicestershire	The CCG recognises the Local Authority has a duty to provide increased levels of new housing across the area and can confirm that in the main we feel we can support practices meeting the	The Council is aware of the impact of development on services, facilities, and infrastructure.
Clinical Commissioning Group	impact for the majority of your proposed new development areas, providing there is suitable S106 healthcare contributions arising from the same.	The impact on infrastructure is considered as part of the SHELAA, IDP, and SA.
	The CCG and the GP Leads, however, are very concerned with regard to the impact of proposed additional housing in Shepshed and would comment as follows:	The Council welcomes the opportunity to liaise with the CCG to establish the full extent of the issues, and to collaboratively work towards deliverable solutions. In particular, the Council would appreciate the opportunity to be part of the inputs to the Primary Care Estate Review, and (where appropriate) help inform the new Primary Care Estate
	 There are two surgeries located in Shepshed, both of which have seen significant increase in patients from recent developments; 	Strategy.
	Both surgeries will be impacted by the already approved North Loughborough SUD as their contracted registration areas cover some of this development; 285	

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	 Both surgery premises will require significant investment to accommodate the additional identified growth up to 2036 and currently we do not have NHS capital funds to meet such improvements. One premises has listed status which could prevent significant development. Even with capital investment, there are local recruitment issues which have already created a shortage of GPs and Nurses in the area; The NHS is implementing schemes to address these shortages however concentrated growth as proposed in Shepshed could exacerbate issues and impact on long term service delivery. 	
	WLCCG would therefore comment that we believe further development in Shepshed on the scale proposed within the Local Plan will pose a significant risk for Health Care provision in the area.	
	In response to this the CCG is currently undertaking a 6 facet Primary Care Estate Review of all surgeries across Leicester City, Leicestershire & Rutland areas. The results of which will be collated on a geographical basis, taking into consideration the analysis of the current estate condition and utilisation, future housing development and other public sector estate.	
	The results of this review will provide a baseline which we will use to inform and develop a new Primary Care Estate Strategy. Current timescale for our first draft strategy is early 2020. Once available the CCG would welcome the opportunity to share this with you and hope we may continue to work together to ensure there is a joined approach towards future development across the Charnwood area.	
EDCLP/243 Infraland	The Council has consistently identified Rothley as a Service Centre and we are pleased to see this continue in Draft Policy LP1. Having read the Charnwood Settlement Hierarchy Assessment March 2018 it is apparent that the level of services and facilities available at Rothley are similar to those at the other service centres and in some cases superior. Although no Doctors Surgery is recorded in Rothley we are of course a short distance away from the two surgeries in Mountsorrel. We believe Rothley has the	Noted – the Council is in receipt of the additional information for the proposal at Rothely and will be considering this additional information as part of the next stage of the draft local plan.
	services and facilities available to meet most of the day to day	

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	needs of residents and good accessibility to services not available within the settlement (Table 3: Proposed Settlement Hierarchy) and we see no case to move the village to a lower level in the hierarchy should there be opposition to Draft Policy LP1.	
	The Council's last plan, the Core Strategy 2015, did not allocate any land in the service centres. Draft Policy LP1 places some 2,490 homes at the Service Centres and we support that as part of the pattern of development. Our land at Cossington Lane has previously been submitted to the Council's Strategic Housing Land Availability Assessment. We agree with the Council's assessment in the 2018 document that recognised the site to be:	
	Suitable: There are no irresolvable physical/environmental constraints preventing development, the site is in a suitable location for development and a suitable access can be achieved; and	
	Achievable: There is considered to be a reasonable prospect that development will be delivered within the timeframe below based on a judgement of the potential economic viability of the site and developer capacity to complete and let/sell the development over that period.	
	We can confirm that the land is available. We are committed to bringing the site forward and are actively taking steps to secure a development partner. The Strategic Housing Land Availability Assessment 2018 noted that the site could be developed within 6- 10 years. We do not disagree with that but subject to planning approval the site could deliver within 1-5 years.	
	In summary, we consider that the Draft Plan provides the basis for a sound local plan under the terms of the National Planning Policy Framework. We agree with the development strategy, settlement hierarchy and distribution of growth set out in Draft Policy LP1 and support the allocation of our land at Cossington Lane as site HS57 in Draft Policy LP3.	
	We would be pleased to see the site taken forward into the next version of the plan and are happy to progress the site in discussion with you.	

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EDCLP/237 P.Williams	Shouldn't the boundaries of the National Forest be defined?	Noted – the designations will be reviewed to ensure that the National Forest is clearly identified on the Policies Map.
EDCLP/231 CBC Neighbourhoods and Community Well Being	 Chapter 4 – Development Strategy, Design of Development & Draft Policy LP 1 & 2 We encourage policy that promotes high quality design principles and the provision of accessible open space, sport and community facilities is integral to this. Whilst Chapter 4 and Draft Policy LP 1 & 2 address broad principles we request that specific reference is made to the following to ensure all new developments are of high quality and support sustainable communities: Sport England Active Design Guidance and The Ten Principles of Active Design; Community Facilities - Policy should recognise the full range of facilities that are required to support a community/development and not just refer to amenity spaces. The location of these community facilities e.g. co-location is also important and the role this has in encouraging active travel; Community Safety - A legal responsibility Section 17 of the Crime and Disorder Act 1998, as amended by the Police and Justice Act 2006, requires responsible authorities to consider crime and disorder (including antisocial behaviour and other behaviour adversely affecting the local environment); and the misuse of drugs, alcohol and other substances in the exercise of all their duties, activities and decision-making. This means that in all policies, strategies and service delivery there is a need to consider the likely impact on crime and disorder. The cumulative effects/impact of developments on community infrastructure needs to be fully considered and planned for. Strategic Community Infrastructure planning is required on both the settlement and Borough level and the impact of individual developments and Inter-Project Effects determined i.e. The combined effects of the Proposed Development with several other developments in the same area (referred to as 'cumulative schemes') which may, on an individual basis be insignificant but, together (i.e. cumulative)), have a significant effect. Legislative Context - The requirement for cumulative effec	This response will be used to help shape the next draft of the local plan. The policy framework set out in the draft local plan does allow for the delivery of community infrastructure, and the consideration of anti-social behaviour and crime. In terms of direct, indirect, and cumulative effects, these are considered through the Sustainability Appraisal process. Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). Sustainability appraisal and strategic environmental assessment are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. In contrast Environmental Impact Assessment is applied to individual projects which are likely to have significant environmental effects (also see the Town and Country Planning (Environmental Impact Assessment) Regulations 2011). Whilst the Second Interim SA Report published in October 2019 does not formally constitute the SA Report required under the legislation; a full SA Report will be prepared alongside the Regulation 19 version of the local plan.

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EDCLP/202	 European Commission (EC) Directive 85/337/EEC (Ref. 17-1) requires assessment of "the direct effects and any indirect, secondary, cumulative, short, medium and long-term permanent and temporary, positive and negative effects of the project". European Directive 2014/52/EU (Ref. 17-2) (amendment of 2011/92/EU above) states that criteria for assessment includes "the cumulation of effects with other existing and/ or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources"; and The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011 amended 2015 (Ref. 17-3) states within Schedule 3(1) that "the characteristics of a development must be considered having regard, in particular to b) the cumulation with other development" and within Schedule 3(2) that "the existing land use" and Schedule 4(4) "description of the development on the environment which should cover cumulative effects". 	The Council considers that Draft Policy LP1 is in conformity with the
Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	seismic change in its nature, the Local Plan needs to be flexible and support alternative uses on 'main town centre use' sites as well as supporting new retail and leisure formats (e.g. click and collect and drive-thru uses), which may have locational needs not suited to denser, pedestrianised high streets but still generate employment and local economy without detriment to town centres.	NPPF (paragraph 68) by establishing a policy framework that underpins the sequential approach to town centre uses.Nevertheless, the Council recognises that the changing nature of retail, and the changing role of town centres, means that policies need to be flexible.
	In its current form, draft policy LP1 could cause unintended consequences in the application of town centre first policy. Policy LP1 should recognise that not all main town centre uses are practicably suited to traditional town centre locations and in such cases, the sequential test should not be applied. Draft policy LP1 should be amended in respect of new employment and retail, accordingly. 'We will apply a sequential approach to the location of proposals for main town centre uses <u>where appropriate</u> . Town centre uses will be directed to town centre locations, then edge of centre locations, and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. <u>Where it can be demonstrated however that a retail</u> and leisure format is not suited to a defined centre location,	This response and the suggested changes will be used as an input into the next draft of the local plan. Where appropriate, policy changes may be made to Draft Policy LP1 and Draft Policy LP17.

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EDCLP/201 Boyer Planning obo Knightwood Trust Farms	 proposals will be considered on their merits rather than applying a sequential approach.¹ Draft Policy LP 1 sets out the development strategy for the Borough, which primarily focuses on urban concentration and intensification. With regards to housing distribution, the Council seeks to direct 36% towards the Leicester Urban Area, 32% towards the Loughborough Urban Area, 15% in the Shepshed Urban Area and 13% in the service centres (Anstey, Barrow upon Sour, Mountsorrel, Quorn, Rothley and Sileby). The remainder of the housing provision will be directed towards other settlements and small villages and hamlets. Accordingly, the preferred strategy would deliver 16,258 new homes (83%) in the urban area and 3,458 homes (18%) in the rural area. The 'Implementation of Spatial Strategy' element of the policy states that development proposals that do not align with the identified pattern of development, will not be supported even when there is a proven shortfall of housing supply. The Local Planning Authority have sought to justify this approach by stating that such development would 'not be considered compatible with the vision and will not meet the objectives of the plan'. On the contrary, proposals for development, which are not allocated but accord with the overall development Plan places too much pressure on the existing settlements in particular Shepshed, Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley, Sileby. It fails to provide the required flexibility in order to ensure that the Council maintain a five year supply of deliverable homes, which has been addressed in greater detail in the response to question 3. In order to ensure that the Plan is positively prepared and accords with national policies, the strategy should deliver an appropriate level of growth within existing settlements whilst perusing a new settlement. Paragraph 4.2.15 of the Charnwood Local Plan Sustainability Appraisal: Spatial Strategy (October 2019) notes that responses	 The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73. The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios. Initially 10 high-level options were defined, three of which included the idea of new settlements. One further option defined the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Again, two out of the seven options included the idea of new settlements. Whilst appraising these options, the Council also developed a 'Hybrid' option. Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council considers that Draft Policy LP1 is in conformity with the NPPF and meets the obligations set out within Paragraph 11.

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	because they consider that a new settlement is unlikely to deliver housing before 2030 and therefore unlikely to meet the housing need over the plan period. It was however, considered that a new settlement could meet the longer-term strategy for Charnwood's development needs beyond 2036. The Sustainability Appraisal goes on to state 'if a new settlement is considered to be an appropriate strategy for meeting the borough's development needs in the longer term it would be addressed in future plans and there would need to be a long lead-in time.'	
	The Council's justification for not proposing a new settlement is short sighted. In order to significantly boost the supply of homes and the economy over the longer term, a more positive and forward thinking approach needs to be undertaken. The Sustainability Appraisal suggests that a new settlement could be considered in future plans. However, it is considered that the Council will be in a similar position in the future whereby they are choosing to not allocate a new settlement because in their view it would not achieve the required housing numbers over the plan period. The Council need to adopt a more proactive approach for planning for the long term needs of the Borough. This can be achieved by supporting growth within existing settlements and allocating a new settlement which will be delivered during this Local Plan period and potentially into the next Local Plan.	
	As outlined in paragraph 2.19, the second part of the policy seeks to preclude development which does not strictly align with the Councils development strategy, even if the Council cannot demonstrate a five year supply of deliverable housing sites. This does not accord with the Revised Framework (2019), which sets out a presumption in favour of sustainable development. Most notably, paragraph 11 of the Revised Framework (2019) states that where the most important policies for determining a planning application are out of date, planning permission should be granted unless the application of policies in the Framework which protects important areas or assets provides a clear reason for refusal, or where there are any adverse impacts which would significantly and demonstrably outweigh the benefits.	
	Paragraph 35 of the Revised Framework (2019), states that Development Plans are examined to assess if they accord with legal and procedural requirements and whether they are	

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	considered to be 'sound'. In order for a Development Plan to be deemed 'sound', it must enable the delivery of sustainable development and be consistent with national policies.	
	The current wording of Policy LP 1 (Development Strategy) is clearly not consistent with the Revised Framework (2019) and therefore it should be amended to ensure that the Plan is 'sound'. It is recommended that the 'Implementation of Spatial Strategy' section of the policy is revised to state that in the absence of a five year housing land supply, sustainable development will be supported, even if it does not accord with the Council's pattern for development.	
EDCLP/192 Severn Trent Water	Severn Trent do not have any objections to the general principles outlined within policy LP1, Severn Trent are also generally supportive of development being located outside of areas at risk of flooding, where possible it is also recommended that sewers are also located outside of areas of flood risk or high groundwater, to minimise the risk of infiltration into the sewerage system and risk of our assets providing a conduit for flood water to be conveyed and having a negative impact on the performance of the sewerage system.	Noted – the Council welcomes the opportunity to liaise with STW on the proposed allocations and the potential impacts on their infrastructure assets.
EDCLP/182 Pegasus obo David Wilson Homes	Draft Policy LP 1 outlines the overall spatial strategy for Charnwood Borough as one of urban concentration and intensification. The policy seeks to make provision for at least 19,716 new dwellings over the plan period 2019 to 2036. Proposals to direct development to Other Settlements such as Queniborough are supported.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
	As included within our response to Q3b above, whereby we have set out the need for greater flexibility in the plan and the need for the Council to appraise a medium growth scenario. We also consider that the distribution strategy does not make best use of the opportunities for sustainable growth at the Other Settlements, and the need for some of the growth proposed to be directed to Shepshed and the less sustainable Other settlements to be re- directed towards the more sustainable Other Settlements such as Queniborough (see Q8 below).	
	The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to reflect a medium growth strategy, provide for a 15% flexibility buffer, and more realistic assumptions 292	

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	on delivery from SUEs, with further provision being made in the Service Centres and the more sustainable Other Settlements to make best use of the available opportunities for sustainable growth. The Table included in the Draft Policy should also make clear that the number of homes directed to different locations are minimum requirements.	
EDCLP/160 Persimmon Homes	We agree with the spatial distribution strategy that is aligned with the Strategic Growth Plan, with the majority in strategic areas. Distribution however should also meet the needs of both the urban and rural communities. Furthermore the Council should consider permitting development adjacent to settlement boundaries	The overall spatial strategy is one of urban concentration and intensification. The development strategy and distribution strategy have been analysed via the SA, with a series of potential alternatives considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
		Initially 10 high-level options were defined, with one further option defined the concept of a standalone new settlement. From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council also developed a 'Hybrid' option.
		Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/158 Mrs J Brettle- West	I agree with the comments made by the inspector of the Core Strategy stating There are commitments for around 3,500 homes in the Service Centres. This is sufficient to meet the levels of planned provision and we only expect to see small scale windfall developments within the settlement boundaries between 2014 and 2028. (4.45, Charnwood Local Plan 2011 - 2028 Core Strategy Adopted November 2015) – I believe all remaining areas around Rothley should be protected and included as areas of separation.	Noted – the development strategy identifies Rothley as a Service Centre. This is based on the evidence of Rothley's role and function within the borough. Draft Policy LP1, Draft Policy LP19, and the Policies Map identify the Area of Local Separation (ALS15 – Birstall/Rothley).
EDCLP/153 East Goscote Parish Council	 Concerns over: most of the housing need is met through the allocation of three very large sites which were allocated within the 2015 Core Strategy: the "Sustainable Urban Extensions" west of Loughborough, north-east of Leicester, and north of Birstall. These sites between them are set to provide 9650 of the proposed dwellings. 	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73. The relationship between the proposed allocations and the SHELAA is set out in the Second Interim SA Report.

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	 Firstly, we object to the unnecessary allocation of approximately 1300 dwellings in excess of the objectively assessed need. This is a high-impact strategy, which would be likely to lead to the emission of an additional 68,250 tonnes of CO2 equivalent and the urbanisation of at least 37ha of land. The absence of an allocation for windfall sites exacerbates the effect and also gives a false sense of certainty over the location of housing over the Plan period. If the additional 1300 dwellings are not constructed as proposed, the relatively loose constraints over location as a consequence of over-allocation could undermine the intensification strategy. Secondly, it is not clear from the Plan and the SHELAA how decisions were made about which sites to allocate. Information about the size of allocated sites correspond to SHELAA sites. Thirdly, there is a failure to provide for demographic change: although almost half of the "new" households in Charnwood over the Plan period are likely to be headed by over-75s, allocations and masterplans are still based on the assumption that development will principally consist of single-family houses. 	

meaning that all accommodated means that developm hence more gree more car-depen concentration all direct developm hampering effor particularly the W We also have conce with reference to the networks, and which "predict-and-provideDCLP-425-470 Environment AgencyThe Environment A 'Environment'. We w should be amended or amenity value, to Borough at the lowe and if necessary, apEDCLP/247 Fisher German obo Mr S W Taylor and Mr P A TaylorNew HomesEDCLP/247 Fisher German obo Mr S W Taylor and Mr P A TaylorNew HomesThe plan needs to p amendment to deliv scenario, include a Leicester City's unn to reflect this.The pattern of deve supported. As state Settlement of Shep New development in	REPRESENTATION SUMMARY	OFFICER RESPONSE
DCLP-425-470The Environment A EnvironmentAgency'Environment'. We way should be amended or amenity value, to Borough at the lowe and if necessary, apEDCLP/247New HomesFisher German obo Mr S WAs detailed in respond the plan needs to play amendment to delive scenario, include a Leicester City's unn to reflect this.The pattern of deve supported. As state Settlement of Shepe New development in of existing services	ift in emphasis towards Other Settlements – almost twice as many houses are expected to be ed within them, as in the 2015 Core Strategy – evelopment is likely to be more dispersed, and reedy of land, more damaging to landscape and endent. It also undermines the Plan's urban and intensification strategy, weakening its drive to oment towards the most sustainable locations, and orts to regenerate neglected urban areas, e Watermead Regeneration Corridor. neerns over the transport policies, which are weak the development of sustainable transport ich seem to be reliant on the philosophy of ide" with regard to private car journeys.	
Fisher German obo Mr S W Taylor and Mr P A Taylor A Taylor A S detailed in response the plan needs to plan amendment to delive scenario, include a Leicester City's unn to reflect this. The pattern of dever supported. As state Settlement of Sheps New development in of existing services	Agency welcomes the wording under sub-section e would suggest however that the first sentence ed to "those locations of the least environmental to brownfield sites and to locations within the west risk of flooding, applying the Sequential Test applying the Exception Test.	Noted – Draft Policy LP1 does include specific reference to the use of brownfield land. Nonetheless, the Council will consider this response in potentially revising the policy framework in the next draft of the local plan.
Medium sized sites planning permission immediately making land supply.	ponse to Question 3, the number of new homes provide for between 2019 and 2036 requires liver a level of growth above the low growth a 20% buffer and, take into consideration nmet need. Draft Policy LP1 requires amendment velopment for the new homes is however ted in response to Question 4, the Urban epshed is a sustainable location for development. t in Shepshed would benefit from the wide range and facilities within the settlement and in ghborough. es attract a range of housebuilders and can, from on being granted, be built out within five years, ng a positive contribution to the Council's housing are of 15% of the total housing requirement to the	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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EDCLP/ 244 Fisher German obo Rearsby Trust	Urban Settlement of Shepshed is fully supported. New Homes As detailed in response to Question 3, the number of new homes the plan needs to provide for between 2019 and 2036 requires amendment to deliver a level of growth above the low growth scenario, include a 20% buffer and, take into consideration Leicester City's unmet need. Draft Policy LP1 requires amendment to reflect this. The pattern of development for the new homes is however supported. As stated in response to Question 4, 'Other Settlements' such as Rearsby are sustainable and can meet the day to day needs of residents. New development in these settlements will not only ensure that services such as the village Primary School are able to thrive as well as supporting the Borough in meeting its housing need over the Plan period. Small sites, in 'Other Settlements' can deliver quickly. Sites of approximately 50 dwellings attract a range of housebuilders and can, from planning being granted, be built out within two years, immediately making a positive contribution to the Councils housing land supply. The proposed share of 5% of the total housing requirement to the 'Other Settlements' is fully supported. New Employment and Retail Draft Policy LP1 provides no opportunity for thriving employment sites, such as Rearsby Business Park to expand and grow. As set out in response to Question 4, Rearsby Business Park plays a modest but an important role in the local economy. Sites like this need the opportunity and flexibility to expand to meet the needs of both the existing occupiers of the site and to meet the needs of new businesses. It is considered that additional land, adjacent to the Business Park should be allocated for employment uses, to provide flexibility and support the local economy in this area. Figure 3 above illustrates the land proposed for allocation for employment use.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. The proposal for additional land adjacent to Rearsby Business Park is noted. This will be considered through the SHELAA and will be used to inform the next draft of the local plan. The Council would welcome a discussion with the Rearsby Trust to understand the future requirements of the Business Park.
EDCLP/239 Jonathon Barratt- Peacock	I support ALS3 and ALS 15 as shown on the Policies Map. ALS 3 is essential to protect the historic Grade 1 listed Rothley Court and its parkland and the far reaching open views which form part of the	Noted – Draft Policy LP1, Draft Policy LP19, and the Policies Map set out the extent of the Areas of Local Separation.

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	Rothley Ridgeway Conservation Area. Local Plan Policies CT4 and CT5 previously provided specific protection this area so we are pleased that you are continuing to safeguard this area from inappropriate development.	
	ALS15 is essential to minimise the huge impact that the very large development at Broadnook will have on existing residents of Rothley and Thurcaston and the setting of Rothley Court.	
EDCLP/239 Vivienne Barratt- Peacock	I support ALS3 and ALS 15 as shown on the Policies Map. ALS 3 is essential to protect the historic Grade 1 listed Rothley Court and its parkland and the far reaching open views which form part of the Rothley Ridgeway Conservation Area. Local Plan Policies CT4 and CT5 previously provided specific protection this area so we are pleased that you are continuing to safeguard this area from inappropriate development.	Noted – Draft Policy LP1, Draft Policy LP19, and the Policies Map set out the extent of the Areas of Local Separation.
	ALS15 is essential to minimise the huge impact that the very large development at Broadnook will have on existing residents of Rothley and Thurcaston and the setting of Rothley Court.	
EDCLP/211 Cllr Margaret Smidowicz	Q 4 The landowners and developers who are keen to offer their land – where are they and why specifically were some landowners chosen and others not? Are some of these in the small hamlet areas. Farm land has been used when deemed appropriate eg, the Science Park, but small groups of houses could be discreetly planned where they are not overtly obvious and barns and stable areas adapted if becoming derelict. All new builds need to be environmentally friendly and parking areas contain appropriate storage and charging points.	The proposed allocations are sites that have been received through the Call for Sites process and the SHELAA. The policy framework set out in the draft local plan ensures that new development will be of a high quality design and mitigate any impacts on the environment.
EDCLP/195 Greg Hutton Davidsons Developments Ltd	The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The proposals to direct development to Other Settlements such as Queniborough are supported.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
	We have commented already on the need for greater flexibility in the plan and the need for the Council to provide for an increased level of housing provision to provide a better balance between socio-economic benefits of growth and potential environmental impacts. We also consider that the distribution strategy does not	

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	make best use of the opportunities for sustainable growth at the Other Settlements and the need for some of the growth proposed to be directed to Shepshed to be re-directed towards the more sustainable Other Settlements (see Q8 below).	
	The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to provide for an increased level of housing growth to deliver socio-economic benefits, provide for at least a 15% buffer, and more realistic assumptions on delivery from SUEs, with further provision being made in the Service Centres and the more sustainable Other Settlements to make best use of the available opportunities for sustainable growth. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations are minimum requirements.	
EDCLP/193 Richard Webb	The distribution of all housing needs when cast upon the settlement hierarchy means that many decisions and allocations are predicated on this being accurate, fair and validated. As a resident of Cossington and a former resident of Thurcaston I can see that these two villages are classified as "other" when there are strong arguments for their status being dropped to "small village or Hamlet".	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
	We can consider the following scenarios: Cropston (a Hamlet) has 2 pubs and a motor repair facility, foot access to trails leading to Bradgate park and a cricket ground and large park and playing fields	This evidence has informed the preparation of Draft Policy LP1. The apportionment of the number of new dwellings to the settlement hierarchy has been informed by the Council's evidence base, and an assessment of alternatives via the Sustainability Appraisal.
	Cossington (other) has a single pub, no shops, no recreational facilities, no sporting grounds East Goscote (other) has a large parade of shops in the centre of it along with parks and recreational fields and a pub	A series of potential alternatives were considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
	Queniborough (other) has newsagents and shops available for day to day needs, large park and playing fields. Other than a pub, and a	Initially 10 high-level options were defined, with one further option defined the concept of a standalone new settlement.
	sports field all other needs in Cossington rely on motor transport. There are no cycle lanes and the shops in the nearest service centre of Sileby are too far to walk especially for the elderly and infirm. In some places throughout the village the footpath only	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council also developed a 'Hybrid' option.
	exists on one side of the road.	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects,

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	By logical reasoning Cossington should now be classified as a Hamlet. The original hierarchy will almost certainly have been produced at a time when there were more or less facilities in each village or when priorities were different (such as reducing the reliance on motor traffic).	and the greatest significant positive effects.
	I believe that 5% is too high a burden for the "other" settlements to support in many cases. These villages are reliant on the use of motor transport and have vey little brownfield sites available for conversion to housing stock. The transport links and infrastructure here tend to be poorer too with many villages suffering at peak times due to already overburdened developments.	
	I believe that the 5% should be distributed across the urban areas. 1% to the already stretched "other" settlements, and then 1% further each on the 4 service centres and urban areas that sit above them in the hierarchy.	
	I believe the hierarchy needs to be re-examined and consulted on as part of the process. There is so much reliance on this table when the villages vary so greatly in size, nature, links, facilities and history.	
	The options here could include not using a hierarchy in this way at all as the villages differ so much. At the very least this table should be re-examined and re-classifications made with agreed review periods or conditions put in place to ensure that it remains valid.	
EDCLP/204 Guy Longley Pegasus obo Davidsons Development Ltd (Rothley)	The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The proposals to direct development to the more sustainable Rural Centres including Rothley are supported.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
(We have commented already on the need for greater flexibility in the plan and the need for the Council to provide for an increased level of housing provision to provide a better balance between the socio-economic benefits of growth and potential environmental impacts. We have also commented that the distribution strategy	
	does not make best use of the opportunities for sustainable growth at the Service Centres and the need for some of the growth proposed to be directed to Shepshed and the less sustainable Other settlements to be re-directed towards the Service Centres.	

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	The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to provide for an increased level of housing growth to deliver socio-economic benefits, provide for at least a 20% buffer, and more realistic assumptions on delivery from SUEs, with further provision being made in the Service Centres to make best use of the available opportunities for sustainable growth. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations are minimum requirements.	
DCLP 265 Silver Fox obo Ms J & Ms A Kimber	Question 6: Draft Policy LP1 – Development Strategy 2.5.1 In general, we support the approach of urban concentration and intensification.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
	2.5.2 Whilst we support the principle of protecting the most sensitive and important areas of the countryside, Policy LP1 should also recognise the contribution which developments can make to improving the quality and quantity of accessible countryside, and ensuring its long-term protection. This level of understanding can only be achieved through fine-grained analysis and understanding of individual sites, recognising broad areas of countryside can still accommodate appropriately designed development.	The Council considers that Draft Policy LP1 is in conformity with the NPPF and meets the obligations set out within Paragraph 11.
	2.5.2 The policy should also not seek to circumvent the NPPF's presumption in favour of sustainable development, in the event of a proven shortfall in the supply of homes. The pattern of development contained within the policy should be seen as a target, and it is beneficial to confirm the broad split of housing between different locations, but it is very unlikely that the precise share of housing provision will be maintained over the plan period. It therefore would be completely inappropriate to resist development on the basis of this share of housing provision if the Local Plan is failing to meet its beneficial to meet its beauting to meet its beauti	
EDCLP/148 Thomas Taylor Planning Ltd obo Mr W Sbitany	housing requirements The Settlement Limits to Development (SLtD) boundaries are not clearly identified on the Proposals Map – "Policies Map 1" which is provided at a low print resolution, nor on the interactive map provided on the Council's website. This is a significant shortcoming of the consultation exercise and the SLtD should be more clearly set out on the Proposals Map for further consultation before the Plan is subject to Examination.	Noted – the limits of development boundaries will be reviewed to ensure there are no unintended errors.
	Notwithstanding the above, the identification of the SLtD Line in the	

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CONSULTEE	vicinity of 34 Brick Kiln Lane does not appear to reflect the Methodology and principles for defining SLtD set out in the Evidence Base. The SLtD line on Policies Map 1 does not reflect the extent of the built up area in this part of the settlement and it should be corrected to identify a more appropriate and justified SLtD boundary as shown on attached Plan S48.1 (see extract at Figure 1 below):	
	TTP/S48 The amended SLtD boundary suggested above (and on attached Plan S48/1) should be drawn so as to include the land tinted red within "limits" and would be consistent with the overall thrust of the Methodology and principles used to define the SLtD. In particular, the proposed SLtD would enclose the existing property at 34 Brick Kiln Lane which comprises a substantial, detached 2-storey house, together with its garden curtilage and outbuilding.	
	Number 34 Brick Kiln Lane is part of the built-form of the settlement and a component of the cohesive group of residential properties along Brick Kiln Lane. There are two points of vehicular access to the property from both Brick Kiln Lane and Pudding Bag Lane. Although Number 34 has a frontage onto Pudding Bag Lane, neighbouring properties at No. 4 Pudding Bag Lane and No. 32 Brick Kiln Lane to the east of Number 34 do also and they have been included within the SLtD. Notwithstanding the frontage onto Pudding Bag Lane, Number 34 Brick Kiln Lane is not an outlying or isolated building and it is neither physically nor visually detached from the built form of the settlement.	
	Principle 1 of the Settlement Limits to Development Assessment - 2018 states that the SLtD boundaries should include the curtilages of buildings which clearly relate to the building through their proximity and character. The associated garden and curtilage of Number 34 is physically and visually related to the house itself and the proposed alteration to the SLtD would follow a line that separates the built form of the settlement both physically and visually from the adjoining countryside to the west. The house, outbuilding and garden/curtilage enclosed within the proposed (amended) SLtD are both physically and visually well-related to the settlement and it should be noted that the more extensive area of garden and paddock to the south of the property which extends to	
	the pond is excluded from the suggested alteration.	
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EDCLP/149 Andrew Thomas Thomas Taylor Planning Ltd obo Charnwood Accountants	The suggested extension to the SLtD boundary identified above and on the attached Plan S48.1 would satisfy both the Methodology and the Principles in the Evidence Base. Settlement Limits & Draft Policy LP1 Amongst other things, Draft Policy LP1 states that whilst the majority of new employment will be delivered as part of Sustainable Urban Extensions and the Watermead Regeneration Corridor, a "smaller proportion" will be delivered within and adjoining Service Centres and Other Settlements. Other parts of Draft LP Policy LP1 indicate that only development which is within defined Limits to Development (Settlement Limits to Development – SLtD) and in the allocations defined in the plan will be supported. Under the heading "Implementing the Spatial Strategy", the first two paragraphs deal with housing development, although the third paragraph states that <i>"In all other circumstances, new built development will be confined to sites allocated in this plan and neighbourhood plans, and other land within the Limits to Development subject to specific exceptions in this plan." The third paragraph appears to apply to employment development as well as housing development. Draft Policy LP1 should be amended to clarify the circumstances and specific exceptions in which employment development either outside of, or adjoining SLtD will be considered acceptable. This might include support for employment development involving previously developed land and buildings and employment development on smaller sites where there would be no adverse impact on the character or appearance of the area. Draft Policy LP1 also sets out a sequential approach to the location of proposals for main town centre uses (including offices) which are to be directed to town centre locations, then edge of centre locations, and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. This is in direct conflict with other policies and decisions should recognise that sites </i>	The Council considers that Draft Policy LP1, when read in conjunction with Draft Policy LP12, provides a clear approach for meeting the economic needs of the borough. However, the Council will use this response to inform the next draft of the local plan, and consider whether the policy wording can be improved to add clarity.

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	amended to acknowledge that proposals for employment development and main town centre uses will be approved in the rural areas and outside SLtD in circumstances where they are in accordance with other policies in the draft Plan (or else set out a set of criteria for assessing such proposals within draft Policy LP1 itself). The draft Plan's Development Strategy states at para 4.6 that it takes account a range of factors in identifying an appropriate spatial pattern of homes, jobs and facilities. Paragraph 4.25 states that the preferred strategy identifies a pattern of development that seeks to support the economy, provide a balance between homes and jobs in the Borough and to ensure access to services and facilities. Paragraph 4.26 states that the development strategy is based on an understanding of each settlement's role and function, and which settlements might be capable of supporting new development. Table 3 sets out a Settlement Hierarchy and Burton on the Wolds is identified as an "Other Settlement" that has some of the services and facilities to meet the day to day needs of residents. This level in the hierarchy is above the level of "Small Village or Hamlet"	OFFICER RESPONSE Noted – the limits of development boundaries will be reviewed to ensure there are no unintended errors. The Council considers that Draft Policy LP1, when read in conjunction with Draft Policy LP12, provides a clear approach for meeting the economic needs of the borough. However, the Council will use this response to inform the next draft of the local plan, and consider whether the policy wording can be improved to add clarity.
	in the hierarchy is above the level of "Small Village or Hamlet" which are considered to have limited services and facilities to meet the day to day needs of the residents. Paragraph 4.20 of the draft Plan states that no new provision for employment land is made over the plan period to 2036 and instead, the existing proposals in	
	the Core Strategy are to be carried forward. Paragraph 4.34 states that it is also proposed to support smaller scale growth in Service Centres and some of our Other Settlements. The growth dispersed to Service Centres and Other Settlements improves the prospects for delivery whilst taking account of landscape and settlement identity constraints outlined in the overall vision and strategy.	
	The draft Plan's Development Strategy so far as it seeks to support smaller scale growth and development in some of the Other Settlements is supported. However, it is considered that the draft Plan's consideration of policies relating to Burton on the Wolds requires amendment as set out below and on the attached Plan S47/1 (Sheets 1 & 2).	
	Settlement Limits & Draft Policy LP1	

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	The Settlement Limits to Development (SLtD) boundaries are not clearly identified on the Proposals Map – "Policies Map 1" which is provided at a low print resolution, nor on the interactive map provided on the Council's website. This is a significant shortcoming of the consultation exercise given that the SLtD are referred to in several policies in the draft Plan and the importance that they will play in the determination of planning applications.	
	The SLtD are set out in the Evidence Base within the "Settlement Limits to Development Assessment Maps- 2018" document although that is not part of the development plan. The SLtD should be more clearly set out on the Proposals Map for further consultation before the Plan is subject to Examination.	
	Notwithstanding the above, the identification of the SLtD Line set out in the Evidence Base documents "Settlement Limits to Development Assessment Maps - 2018" and "Settlement Limits to Development Assessment - 2018" in the vicinity of Sowters Lane does not appear to reflect the Methodology and principles for defining SLtd set out in the Evidence Base. Policies Map 1 should be corrected to identify a more appropriate and justified SLtD boundary as shown on attached Plan S47.1 (see extract at Figure 1 below): SEE MAP IN REP.	
	The amended boundary suggested above (and on attached Plan S47/1) should be drawn so as to include the land tinted red within "limits" and would be consistent with the overall thrust of the Methodology and principles used to define the SLtD. In particular, the proposed SLtD would enclose an existing group of substantial industrial buildings and storage uses which reflect the built form of the settlement. The land and buildings are separate from the adjoining Poultry Farm and clearly industrial in character. They are well-defined by strong, defensible boundaries comprising mature hedges and fencing and Sowters Lane itself which separate the built form of the settlement both physically and visually from the countryside beyond The buildings and storage land are in existing industrial use and provide a source of employment for the local community.	
	The land and buildings are a long-standing part of the built-form of the settlement on the eastern side of Burton on the Wolds and form	

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	a cohesive group of industrial buildings and associated uses. It is noted that nearby housing development on Sowters Lane/Seals Close is further detached from the eastern edge of the settlement than these industrial buildings but are provided with a SLtD line themselves.	
	Principle 1 of the Settlement Limits to Development Assessment - 2018 states that the SLtD boundaries should include the curtilages of buildings which clearly relate to the building through their proximity and character. The associated storage and parking areas between the industrial buildings are physically and visually related to the buildings themselves and the proposed SLtD line would separate the built form of the settlement both physically and visually from the countryside beyond. The buildings and uses enclosed within the proposed amendment to the SLtD are both physically and visually well-related to the settlement – whether one considers their relationship to the main settlement or the houses on Sowters Lane/Seals Close or else as a cohesive group of buildings and uses in their own right. The suggested extension to the SLtD boundary identified above would satisfy both the Methodology and the Principles in the Evidence Base.	
	Draft Policy LP1 Amongst other things, Draft Policy LP1 states that whilst the majority of new employment will be delivered as part of Sustainable Urban Extensions and the Watermead Regeneration Corridor, a "smaller proportion" will be delivered within and adjoining Service Centres and Other Settlements. This is welcome although other parts of Draft LP Policy LP1 indicate that only development which is within defined Limits to Development and in the allocations defined in the plan will be supported. For example, under the heading "Implementing the Spatial Strategy", whilst the first two paragraphs deal with housing development, the third paragraph states that "In all other circumstances, new built development will be confined to sites allocated in this plan and neighbourhood plans, and other land within the Limits to Development subject to specific exceptions in this plan.". The third paragraph appears to apply to employment development as well as housing development and there is therefore some tension between these various parts of the Draft Policy LP1.	

Draft Policy LP1 should therefore be amended to clarify the

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	circumstances and specific exceptions in which employment development either outside of, or adjoining SLtD will be considered acceptable. This might include support for employment development involving previously developed land and buildings and employment development on smaller sites where there would be no adverse impact on the character or appearance of the area.	
EDCLP/151 Andrew Thomas Thomas Taylor Planning Ltd obo Mr W Murdoch	 Settlement Limits The Settlement Limits to Development (SLtD) boundaries are not clearly identified on the Proposals Map – "Policies Map 1" which is provided at a low print resolution, nor on the interactive map provided on the Council's website. This is a significant shortcoming of the consultation exercise given that the SLtD are referred to in several policies in the draft Plan and the importance that they will play in the determination of planning applications. The SLtD are set out in the Evidence Base within the "Settlement Limits to Development Assessment Maps- 2018" document although that is not part of the development plan. The SLtD should be more clearly set out on the Proposals Map for further consultation before the Plan is subject to Examination. Notwithstanding the above, the identification of the SLtD Line set out in the Evidence Base documents "Settlement Limits to Development Assessment Maps - 2018" and "Settlement Limits to Development Assessment Maps - 2018" and "Settlement Limits to Development Assessment Plan". Notwithstanding the above, the identification of the SLtD Line set out in the Evidence Base documents "Settlement Limits to Development Assessment - 2018" in the vicinity of 84 Melton Road, Barrow Upon Soar does not appear to have been accurately transferred onto the draft Policies Map 1. Changes should be made to the draft Policies Map 1 as follows: In the first instance, as a minimum, Policies Map 1 should be corrected to identify the SLtD boundary based upon that described and illustrated in the Evidence Base documents "Settlement Limits to Development Assessment Assessment Assessment Assessment - 2018" as shown on Plan H33-A below: SEE MAP in REP The SLtD boundary indicated in the "Settlement Limits to 	Noted – the limits of development boundaries will be reviewed to ensure there are no unintended errors.
	Development Assessment Maps - 2018" Evidence Base document should also be amended/enlarged to include the garden, curtilage and outbuildings clearly associated with 84 Melton Road as well as the proposed Housing Allocation Site HS52. The amended boundary is suggested above on Plan H33-A (the 306	

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	 amended/enlarged SLtD boundary should be drawn so as to include the land tinted red within "limits") and would be consistent with the overall thrust of the Methodology and Principles used to define the SLtD. In particular, it would reflect the existing built form of the settlement on the eastern side of Barrow Upon Soar following defensible boundaries which separate the built form of the settlement both physically and visually from the countryside beyond. Principle 1 of the Settlement Limits to Development Assessment - 2018 states that the SLtD boundaries should include the curtilages of buildings which clearly relate to the building through their proximity and character as well as "planned allocations in development plan documents where a boundary has been identified". The suggested extension to the SLtD boundary identified above would satisfy both the Methodology and the principles in the Evidence Base having regard also to proposed Housing Allocation Site HS52. 2. Secondly, having regard to the Methodology and Principles used to define the Settlement Limits to Development, Policies Map 1 	
	should be amended as shown on Plan H33-B below: SEE MAP IN REP	
	The SLtD boundary should be enlarged to include the garden, curtilage and outbuildings clearly associated with 84 Melton Road; the proposed Housing Allocation Site HS52 and the land and buildings at "Seagrave Nurseries" which are used for a mix of horticultural and retail sales in accordance with planning permission P/07/1369/2 for the "Erection of horticultural building (240sq.m) and growing tunnels, formation of parking area and access to roundabout and use of part of the land for the sale of imported goods (comprising seeds, seedlings, stock plants, plants to grow on, exotic plants/trees, Christmas Trees, growing mediums, fencing, plant pots, garden tools, potatoes, eggs and horsefeed)".	
	The amended boundary as suggested above on Plan H33-B (the amended/enlarged SLtD boundary should be drawn so as to include the land tinted red within "limits") would be consistent with the overall thrust of the Methodology and Principles used to define the Settlement Limits to Development. In particular, it would reflect the built form of the settlement on the eastern side of Barrow Upon Soar following defensible boundaries which separate the built form	

	of the settlement both physically and visually from the countryside	
2	Principle 1 of the Settlement Limits to Development Assessment – 2018 states that the SLtD boundaries should include the curtilages of buildings which clearly relate to the building through their proximity and character as well as "planned allocations in	
ic p c s c s t t	development plan documents where a boundary has been dentified". The nursery includes several buildings as well as barking and servicing yards, growing and storage areas on land clearly within the curtilage of these buildings. The nurseries are not solely an agricultural use as the terms of the planning permission confirm. Furthermore, they are well-related to the built form of the settlement both physically and visually. The suggested extension to the SLtD boundary identified on plan H33-B above would satisfy the both the principles and the Methodology set out by the Council	
ir DCLP 266 Leicester City Council T s a li ir p " " c c c c c c c c c c c c c c c c c	In the Evidence Base. The City Council understands and supports the role of the Limits to Development boundaries in protecting the countryside and helping to direct development to existing settlements within Charnwood. The City Council notes that changes to the boundaries are supported by a Settlement Limits Draft Assessment (2018), and it appears that the draft Assessment proposes a tightening of the imits to development around many of the reviewed settlements ncluding Loughborough. This reflects the criteria (at 'principle 1' of paragraph 2.3) of the Assessment's methodology which states that 'The boundary will tightly define the settlement by enclosing the established cohesive built form". The City Council notes that the criteria were developed in consultation with town and parish councils and local ward members (but not HMA partners). Having regard to Appendix A of the SGP, the City Council would wish the proposed boundaries to be reviewed prior to submission stage to enable consideration of the potential capacity of existing settlements to meet a portion of the City's unmet need within Charnwood should this prove necessary following DTC and SCG discussions and agreement. The City Council notes that the proposed boundaries around Anstey exclude the proposed site allocation HS5 (Land at Gynsill Lane and Anstey Lane) to which Policy LP3 refers. The City Council notes that the proposed boundary around the south side of Thurcaston would no longer be (predominantly)	The Council welcomes the opportunity to discuss the limits of development with L.City. This response will be used to inform the next stage of the draft local plan.

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	Council may wish to take into account that the City Council's Overview Select Committee received a presentation at its meeting on 28th November 2019 identifying land north of the A46 (adjacent to Thurcaston) as a strategic housing site to be included in the City's forthcoming consultation draft Local Plan.	
DCLP 266 Leicester City Council	The City Council considers that the transport bullet point could be strengthened to read: "minimise the need to travel, particularly by private car, and encourage the use of public transport, park and ride (existing and future), walking and cycling;".	Noted – the Council welcomes the proposed change to the policy wording and will consider this amendment as part of the next stage of the draft local plan.
DCLP 266 Leicester City Council	The City Council welcomes the expression of the 19,716 homes target as a minimum. The City Council would wish to see the minimum homes target reviewed prior to submission stage to include such portion of the City's unmet need as will be agreed with HMA partners in forthcoming months following DTC and SCG discussions and agreement.	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.
EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	Comment The proposed development strategy and draft policy LP 1, which focusses new development in Loughborough and the edge of Leicester is supported. These are sustainable locations for new development which already have a range of services and facilities, employment opportunities and public transport infrastructure in place.	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
	The provision of new homes within these areas will support these existing facilities whilst also providing opportunities to improve these and increase the range and availability of services to existing communities.	
	This also reflects the Strategic Growth Plan for Leicester and Leicestershire (2018) which illustrates the A46 Priority Growth Corridor wrapping to the east and north east of Leicester.	
	The proposed delivery of 7,056 new homes in the Leicester Urban Area (Birstall, Syston, Thurmaston) will enable the delivery of sustainable new development which would have access to and improve the provision of services and facilities; employment opportunities; and public transport infrastructure.	
	The overall scale of development and distribution as set out in Draft	

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	Policy LP 1 needs to be amended to provide for an increased level of housing growth to deliver socio-economic benefits, provide for at least a 20% buffer, and more realistic assumptions on delivery from SUEs. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations are minimum requirements.	
EDCLP/175 Ian NelsonNorth West Leicestershire	There appears to be a discrepancy between the draft Local Plan and the Employment land Study reading the amount of office development required. The figures quoted in the plan for offices (11.4ha) is slightly less than that identified in the Employment Land	Noted – the draft local plan references the demand analysis from the HEDNA report. The next draft of the local plan will include the latest analysis of employment needs.
District Council	Study (14ha). If this is the case clarification is required as to why there is a difference.	The proposed supply of land for office use is 14ha, as per the Employment Land Review (March 2018).
	Clarification is required as to why the plan does not make provision for 10ha of land for larger warehouses as recommended in the Employment Land Study.	The Council welcomes the opportunity to liaise with NW Leicestershire Council to agree how to proceed with the International Gateway proposals. The Council expects to draft and agree a Statement of Common Ground with NW Leicestershire Council as part of finalising the
	The proposed identification of 2,000 dwellings at Shepshed is noted and no objection is raised, subject to appropriate mitigation measures being provided to minimise any visual impact and the impact upon the local highway network, particularly the B5324.	local plan.
	Notwithstanding the above, there is a need to ensure that adequate evidence is provided that the proposed 2,000 dwellings are deliverable so as to avoid increased pressure for development in North West Leicestershire, particularly in respect of the Leicestershire International Gateway included in the Strategic Growth plan. For example, it is noted that paragraph 5.7 of the plan highlights that the proposed allocations would have an impact upon biodiversity. It is not clear whether this impacts upon the deliverability of these proposed allocations.	
	North West Leicestershire District Council welcomes the recognition of the Gateway in the draft plan. However, further discussions and joint working between the two authorities is required with a view to reaching an agreement regarding the distribution of development associated with the Gateway and to ensure that the impact arising from any development in the Gateway is appropriately mitigated.	
EDCLP/177 Sue Green	Draft Policy LP1 – Development Strategy makes provision for at least 19,716 dwellings between 2019 and 2036. The pattern of 310	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph

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House Builders Federation	 development for new housing in the spatial strategy is as follows :- Leicester Urban Area (Birstall, Syston, Thurmaston) - 7,056 dwellings (36%) ; Loughborough Urban Centre - 6,331 dwellings (32%) ; Shepshed Urban Area - 2,871 dwellings (15%) ; Service Centres (Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley, Sileby) - 2,490 dwellings (13%) ; Other Settlements - 945 dwellings (5%) ; and Small Villages and Hamlets - 23 dwellings (0.1%). The preferred development strategy distributes 16,258 dwellings (83%) to urban area and 3,458 dwellings (18%) to the rural area. New residential development is also confined to allocations and land within Limits to Development boundaries (also see answers to Questions 3 and 4 above). In Draft Policy LP1 there is no distinction between housing requirement and HLS, which is confusing. The policy should be clearer. Furthermore, if there is a proven shortfall in housing delivery, the Council should be supporting proposals for sustainable development under the presumption in favour in accordance with national policy. 	60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73. Draft Policy LP3 sets out the housing land supply for the borough. The Council considers that Draft Policy LP1 is in conformity with the NPPF and meets the obligations set out within Paragraph 11.
EDCLP/194 Guy Longley Pegasus on behalf of Hallam Land Management	The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The proposals to direct development to the more sustainable Rural Centres including Sileby are supported. Reference is made to supporting sustainable development within defined Limits to Development. Paragraph 4.37 refers to the limits to development boundaries defining the cohesive built form of settlements, taking account of development allocations made. For Sileby, the settlement limits at Seagrave Road as shown on the Draft Plan Proposals Map does not reflect the fact that consent has been granted for development to the south of Seagrave Road (application reference P/15/0047/2 and Reserved Matters consent P/19/1215/2). The Limits to Development should be amended to include the consented site within the settlement limits in accordance with the attached redline plan.	Noted – the limits of development boundaries will be reviewed to ensure there are no unintended errors. The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73. The Council considers that Draft Policy LP1 is in conformity with the NPPF and meets the obligations set out within Paragraph 11.

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	It is important that the plan encourages the efficient use of land committed for development in the settlement limits or proposed for allocation. Paragraph 117 of the National Planning Policy Framework (NPPF) advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 122 states that planning policies should support development that makes efficient use of land and paragraph 123 notes that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. Draft Policy LP 1 needs to be amended to make it clear that the Council will encourage the best use to be made of existing housing commitments, ensuring that development opportunities on sites with permission are maximised.	
	For the land at Seagrave Road, Sileby, there may be the opportunity for further development on the site should circumstances change in relation to odour issues associated with the poultry farm to the north of the site. Draft Policy LP 1 should be clear that the Council will favourably consider proposals to make best use of committed housing sites falling within the Limits to Development. It is recommended that Draft Policy LP 1 should be amended to include a further bullet point dealing with this issue:	

Development proposals will be supported which:

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• make best use of existing committed housing sites within limits to development.

Additional housing on committed sites will be supported where the proposal

safeguards the residential amenities of existing and future residents;

The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to provide for higher growth strategy and provide for at least a 20% buffer, with further provision being

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	made in the Service Centres to make best use of the available opportunities for sustainable growth, including the potential to accommodate additional housing on committed housing sites. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations represent minimum requirements.	
EDCLP/252 Leicestershire County Council	Paragraph 1 the regeneration corridor should also support maximising the potential of other open space assets such as the Grand Union Canal and River Soar. [page 27]	Noted – these representations will be used to refine the next draft of the local plan. Where relevant, the policy framework will be amended to reflect these issues.
EDCLP/252 Leicestershire County Council	Should there not also be reference to Public Health in considering what types of development proposals will be supported. Could it not also refer to encouraging Low / Ultra low forms of vehicles eg EV's, LEV's	
EDCLP/252 Leicestershire County Council	protect and enhance most environmentally sensitive areas. [p28]	
EDCLP/252 Leicestershire County Council	contribute to mitigating, resilient and adapting to climate change Under protect and enhance the intrinsic character of the countryside. [p28]	
EDCLP/252 Leicestershire County Council	The County Council's new Growth Unit will be able to assist with accelerating the delivery of strategic sites.[Cabinet Report]	
EDCLP 267 Loughborough Area Committee	Draft Charnwood Local Plan 2019-36 That the Planning Team consider the responses of the Loughborough Area Committee in relation to the draft Local Plan: The consideration of alternative locations for growth as there were existing infrastructure concerns within and around the Loughborough area, specifically heavy traffic, which could worsen with the additional developments proposed.	
EDCLP/271 Lichfields on behalf of St Philips	St Philips generally supports Draft Policy LP1 and how it directs 13% of the housing provision to the Service Centres, including Barrow Upon Soar.	Noted – This response will be used to inform the next stage of the draft local plan. The alternative appraisal of HS53 and HS54 will be used to review the site assessment work.

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	REPRESENTATION SUMMARY demonstrate that these sites are situated in moderate environmentally sensitive locations and therefore development it this location would be unsustainable. As above, the gradualist approach within policy LP1 is not equal to the scale and rate of change required, either by the climate science (summarised in the IPPC 1.5 degree report) or our legislative commitments around carbon reduction in the Climate Change Act. I've suggested wording to reflect the paradigm shift needed, which needs to flow through to all other policies. I've also suggested changed wording to sentence two to suggest more equal balance between objectives to prioritise sustainab patterns of development and the protection of environmental sensitive areas. It would be beneficial to clarify what is mean the "most environmentally sensitive areas". Does this mean area which are sensitive in landscape and visual terms? Dat Policy L*I Development Strategy The overall spatial strategy for Charnwood, between 2019 and 2036, is urban concentration and intensification. An environmentally sensitive areas will be protected and the pattern of development will provide. Will apport sustainable pattern of development will protected will be patterned will be protected will be subtainable for all will be subtainable for all will be subtainable and active transport models. <t< td=""><td> The Council welcomes the constructive and helpful comments on the draft local plan, and the proposed amendments to the policy wording. This response will be used to inform the next stage of the draft local plan. In considering any changes to policy wording it is important to reflect that any policy proposed in the local plan must be capable of being a implemented and criteria within policies should not compromise the viability of future development. In terms of adapting to, and mitigating against, climate change, Draft Policy LP30 sets out a series of requirements for future development. </td></t<>	 The Council welcomes the constructive and helpful comments on the draft local plan, and the proposed amendments to the policy wording. This response will be used to inform the next stage of the draft local plan. In considering any changes to policy wording it is important to reflect that any policy proposed in the local plan must be capable of being a implemented and criteria within policies should not compromise the viability of future development. In terms of adapting to, and mitigating against, climate change, Draft Policy LP30 sets out a series of requirements for future development.
	adaptation and mitigation.	

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	committed through extant planning permissions. Given their scale, we would encourage these consents to be reviewed to see whether there is still scope for the council to require the inclusion of district heating networks within these sites, for example where bare outline consents have been granted.	
	In general looking at the process of allocating development sites, we would encourage that specific consideration be given to whether allocated development sites are large enough and at a high enough density to make their connection to district heating systems economically viable and technically feasible, large enough to fund good quality strategic transport infrastructure, and well connected enough to enable non-car dependent lifestyles.	
	Essentially the question could be asked: what scale of housing, density and use mix is needed to make district heating, the provision of good quality sustainable transport infrastructure and sustainable communities feasible and viable? Research and modelling would be necessary to provide an answer, but in general it suggests that the majority of development should be accommodated within fewer, larger allocations of mixed housing and employment, urban extensions and gardens towns.	
	We have a new tool, Thermos (released for testing – introduction: <u>https://www.thermosproject.eu/home/</u> tool: <u>https://tool.thermos-project.eu/login?redirect-to=/</u>) which will semi-automate the process of designing and optimising district heating networks for existing neighbourhood. We are also looking at applications of this tool which will enable proposed layouts and masterplans to also be tested for their district heating potential, with the potential to be used by both developers in masterplanning and by local authorities during the assessment of planning applications.	
EDCLP/275 Define obo William Davis	 The NPPF no longer uses the language of seeking to protect the countryside simply because it is countryside. As such, it does not preclude development in the countryside and it is entirely inappropriate for the DLP to seek to do so. Furthermore, the imposition of a pre-NPPF style 'blanket' protection of the countryside and constraint on development outside of tightly defined limits to development around 	The Council considers that Draft Policy LP1 is in conformity with the NPPF and meets the obligations set out within Paragraph 11. The draft local plan also fulfils the obligations set out in Paragraph 60 and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
	settlements, effectively removes any flexibility to embrace potential sustainable development opportunities as they arise 315	Draft Policy LP1 works in conjunction with Draft Policy LP19 and Draft Policy LP20 to give a framework for how any proposals for development

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	 and where there may be wider socio-economic benefits that outweigh any harm, or where that harm can be appropriately mitigated. This is contrary to the requirement of the NPPF's presumption in favour of sustainable development (paragraph 11), which requires the Local Plan to be sufficiently flexible to adapt to rapid change. Moreover, in practice, it undermines the application of the 'tilted balance' that is intended to provide an effective short-term remedy in circumstances where there is not a demonstrable 5 year land supply and/or key policies are 'out of date' (paragraph 11). The references to 'protecting' the countryside should, therefore, be removed from Policy LP1 (and also Policy LP19). Moreover, the implementation section of the policy must be revised to clarify that in the circumstances of a shortfall in the Borough's housing supply, the Limits to Development and countryside policy designation will not in themselves be determinative in the consideration of applications for otherwise sustainable development. 	in the countryside would be considered. Draft Policy LP1 also provides the flexibility that development proposals, which accord with the overall vision of the plan, are likely to be approved where a five-year supply of homes cannot be demonstrated.
EDCLP/276 Pegasus obo Wilson Enterprises	 The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to provide for higher growth and provide for at least a 20% buffer, with further provision being made in locations adjoining the Leicester urban area to make best use of the available opportunities for sustainable growth. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations represent minimum requirements. 	The proposed number of new dwellings set out in the draft local plan fulfils the obligation set out in the NPPF at Paragraph 11 and Paragraph 60; and has been drafted in such a way to comply with the requirements set out in Paragraph 73.
EDCLP/277 RPS obo Bellway Homes	 more transparency and clarity is required in relation to the numbers quoted under the 'New Homes' section, particularly in terms of how these have been calculated and assessed against the Council's overall housing need across the whole of the plan period including where delivery has been slower against the agreed annual targets. The draft policy states that the draft Local Plan makes provision for at least 19,716 new homes between 2019 and 2036; and that Leicester Urban Area (Birstall, Syston, Thurmaston) will provide 7,056 homes, (i.e.36% share of the overall housing 	

provision within this part of the plan period). This is of concern in that it appears to ignore 8,100 homes for the earlier tranche	
of the Local Plan period, justifying the lower growth scenario which is not supported based on the arguments set out earlier, and is contrary to National Planning Policy to significantly boost the supply of housing.	
• Whilst we agree with the general principle of focusing new homes where existing services and facilities are located, we have significant concerns over the clear neglect to the more	The evidence base for the draft local plan includes the Charnwood Settlement Hierarchy Assessment (March 2018). This work analyses the role and function of the settlements within the borough and highlights the range of services and facilities within individual settlements in Charnwood. It also explores the relationship settlements have with larger
NPPF which supports the development of rural development as a method for improving the sustainability and vitality of a settlement, as outlined within NPPF paragraphs 77 - 78.	urban areas in terms of homes and jobs and the accessibility of services by public transport. The assessment provided the evidence that led to the identification of a settlement hierarchy for Charnwood.
 rural settlements, in order to meet locally arising needs and priorities and to secure their continued vitality. This flexible approach has been adopted by other Local Planning Authorities, including Harrogate which under Policy CS3 states that rounding off in 'smaller villages' will be 	This evidence has informed the preparation of Draft Policy LP1. The apportionment of the number of new dwellings to the settlement hierarchy has been informed by the Council's evidence base, and an assessment of alternatives via the Sustainability Appraisal.
supported subject to policy GS3 which states: "Proposals for new development on sites outside the development limit of a settlement will be supported where it is consistent with the role	A series of potential alternatives were considered. Seven approaches to the distribution of housing have been appraised, and these were set against two growth scenarios.
Growth Strategy to 2035, does not result in a disproportionate level of development compared to the existing settlement and	Initially 10 high-level options were defined, with one further option defined the concept of a standalone new settlement.
A. The site is well related to the existing built form of the settlement;B. There is either no suitable and available site for the	From these initial high-level options, seven more 'refined' and locationally specific options were defined. Whilst appraising these options, the Council also developed a 'Hybrid' option.
allocated under policies DM1: Housing Allocations, DM2: Employment Allocations and DM3: Mixed Use Allocations; C. It would not result in coalescence with a neighbouring settlement;	Ultimately, the Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
D. It would not have a significant adverse impact on the character and appearance of the surrounding countryside or heritage assets;E. The proposal is of a scale and nature that is in keeping with the core shape and form of the the settlement and will not	The Council acknowledges the proposed amendments to Draft Policy LP1, and welcomes the constructive feedback and advice. The response and proposed alternative wording will be considered as part of the next stage of the draft local plan.
	 and is contrary to National Planning Policy to significantly boost the supply of housing. //illage Settlement Boundaries Whilst we agree with the general principle of focusing new homes where existing services and facilities are located, we have significant concerns over the clear neglect to the more rural areas within the Borough. This clearly goes against the NPPF which supports the development of rural development as a method for improving the sustainability and vitality of a settlement, as outlined within NPPF paragraphs 77 - 78. The PPG also sets out the importance of modest growth in rural settlements, in order to meet locally arising needs and priorities and to secure their continued vitality. This flexible approach has been adopted by other Local Planning Authorities, including Harrogate which under Policy GS3 states that rounding off in 'smaller villages' will be supported subject to policy GS3 which states: "Proposals for new development on sites outside the development limit of a settlement will be supported where it is consistent with the role of the settlement in the growth hierarchy set out in policy GS2: Growth Strategy to 2035, does not result in a disproportionate level of development compared to the existing settlement and meets the following criteria: A. The site is well related to the existing built form of the settlement; B. There is either no suitable and available site for the proposed use within the settlement development limit or site allocated under policies DM1: Housing Allocations, DM2: Employment Allocations and DM3: Mixed Use Allocations; C. It would not have a significant adverse impact on the character and appearance of the surrounding countryside or heritage assets; E. The proposal is of a scale and nature that is in keeping with

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	 F. It would not result in ribbon development." Within the 2017 Central Lincolnshire Plan this provides percentage growth for villages which are in an appropriate location within/adjacent to the village under Policy LP4. It reads of follows: "In principle, settlements within categories 5-6 of the settlement hierarchy will be permitted to grow by 10% in the number of dwellings over the plan period except for those settlements identified in the table below where an alternative level of growth is identified" It is noted that settlements in these categories noted for Harrogate and Lincolnshire are similar in size to Hoton. The due to be adopted South Kesteven Local Plan also states at policy SP4 that: "Proposals for development on the edge of a settlement, which are in accordance all other relevant Local Plan policies, will be supported provided that the essential criteria are met." These policies ensure that the rural communities within the borough are not neglected and build in a flexible approach to allow their future vitality and sustainability – an approach it is essential for Charnwood to replicate to ensure these villages are able to sustain and thrive. In the case of Hoton, we note how the Wolds Village Neighbourhood Plan being submitted to the Charnwood Borough Council for Examination in August 2019 and support for delivering in these areas purely through Neighbourhood Planning (paragraph 4.35). Whilst this is an important tool it fails to attribute any growth to Hoton and as such it is key that this is not used to restrict any discussions around growth within the settlement in the future. It is understood that much of the counter argument for adopting a more flexible policy approach centres around the sustainability It is worth noting the villages of Burton on the Wolds, Cotes, Prestwold and Hoton represent a sustainable within the NPPF, at para 78 which states that "where there are groups of smaller settlements, development in one	

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In respect of the site, Hoton itself benefits from a pub with the neighbouring Burton on the Wolds providing further services to the area, collectively making them a sustainable location for development. Charnwood should assign cluster of villages which are in relatively close proximity to one another, higher in the settlement hierarchy so as to ensure that those smaller villages are able to grow at an proportionate level which supports their vitality. This positive approach has been adopted by other Local Planning Authorities such as Hambleton District Council and should be also be implemented in Charnwood to recognise sustainability.

Future Sustainability

- The supporting text should recognise that housing has a fundamental role to play in the sustainability of villages, such as Hoton. In doing so it will make a contribution in meeting the overall housing targets for the area and should be recognised as a key component to the overall growth strategy within the district and in encouraging sustainable development more generally in rural areas. This matter is directly reflected in the PPG which states:
- "A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness." (Our emphasis).
- In absence of clear evidence the development of land lying to the east of Rempstone Road, Hoton is promoted for a small scale, residential development to not only ensure the vitality of Hoton but also the neighbouring villages as a collective under the 'Wolds Villages', in accordance with the PPG. The site could also help to alleviate the housing pressures relating to the Defence Medical Rehabilitation Centre which opened late 2018 and provide 'starter homes' to help affordability and home ownership within the village whilst also safeguarding the social infrastructure of the village.
- In short, with specific regard to Policy LP1, there should be the incorporation of development which results in the rounding off of settlements, including in sustainable village locations. As mentioned above, supporting growth in villages should be supported with the Local Plan and rounding off of villages can

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	provide the appropriate level of growth.	
	Recommendation 3: Edit the first sentence of LP1 to read: "The overall spatial strategy for Charnwood, between 2019 and 2036, is urban concentration and intensification. The most environmentally sensitive areas will be protected and the pattern of development will provide a balance between homes, jobs and facilities. We will support sustainable development within and adjacent to defined Limits to Development subject to the requirements of policy LP[x] and in the allocations defined in this plan."	
	Insert policy LP[x] to read: In small villages, proposals for new development on sites outside the development limit of a settlement will be supported where it is consistent with the role of the settlement does not result in a disproportionate level of development compared to the existing settlement and meets the following criteria:	
	 A. The site is well related to the existing built form of the settlement; B. There is either no suitable and available site for the proposed use within the settlement development limit or site allocated C. It would not result in coalescence with a neighbouring settlement; D. It would not have a significant adverse impact on the character and appearance of the surrounding countryside or heritage assets; E. The proposal is of a scale and nature that is in keeping with the core shape and form of the settlement and will not significantly harm its character and appearance; and F. It would not result in ribbon development." 	
	 In the interests of effective, justified , positive and consistent plan making. 	
EDCLP/207 Guy Longley Pegasus obo Davidsons	The overall spatial strategy for the Borough is outlined in Draft Policy LP 1, being one of urban concentration and intensification. Proposals are set out to provide at least 19,716 dwellings over the plan period. The proposals to direct development to the more	The proposed changes to the limits of development are being made to strengthen the policy approach of focusing development toward more sustainable locations, and promoting opportunities for regeneration.
Development Ltd	sustainable Rural Centres including Sileby are supported.	The limits of development boundaries will be reviewed to ensure there

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are no unintended errors.

Reference is made to supporting sustainable development within defined Limits to Development. Paragraph 4.37 refers to the limits to development boundaries defining the cohesive built form of settlements, taking account of development allocations made. For Sileby, the settlement limits at Seagrave Road as shown on the Draft Plan Proposals Map shows part of the committed housing site at Peashill Farm within the proposed limits to development. The limits to development do not accurately reflect the consent on the site granted under outline application reference P/17/1578/2.

As drafted the limits exclude areas of open space that are an integral part of the approved development and should properly be included within the settlement boundary. The redline boundary for the consented application reflects the committed development area and should be used for the purposes of defining settlement limits. The Sileby Neighbourhood Plan was the subject of a positive Referendum on the 21st November 2019. This correctly shows the whole of the committed site within the Limits to Development. The approach proposed to be taken in the Draft Plan is inconsistent with the approach in the soon to be adopted Neighbourhood Plan which will soon be part of the development plan.

The Limits to Development should therefore be amended to include the consented site at Peashill within the settlement limits in accordance with the attached redline plan [PDF available] which is consistent with the Neighbourhood Plan.

It is important that the plan encourages the efficient use of land committed for development in the settlement limits or proposed for allocation. Paragraph 117 of the NPPF advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Paragraph 122 states that planning policies should support development that makes efficient use of land and paragraph 123 notes that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. Draft Policy LP 1 needs to be amended to make it clear that the Council will encourage the best use to be made of existing housing commitments, ensuring that development opportunities on sites

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CONCEPTE	with permission are maximised.	
	For the land at Peashill Farm, Sileby, there is the opportunity for some further development within the consented area to provide some additional 31 dwellings. This will maximise the development opportunity on the committed site and is wholly consistent with the NPPF. Draft Policy LP 1 should be clear that the Council will favourably consider proposals to make best use of committed housing sites falling within the Limits to Development.	
	It is recommended that Draft Policy LP 1 should be amended to include a further bullet point dealing with this issue: Development proposals will be supported which:	
	• make best use of existing housing sites and committed housing sites within limits to development. Additional housing on committed sites will be supported where the proposal safeguards the residential amenities of existing and future residents;	
	The scale of development and distribution as set out in Draft Policy LP 1 needs to be amended to provide for a higher level of growth and provide for a at least a 20% buffer, with further provision being made in the Service Centres to make best use of the available opportunities for sustainable growth, including the potential to accommodate additional housing on committed housing sites. The Table included in the Draft Policy should make it clear that the number of homes directed to different locations represent minimum requirements.	
Q7 - LP2 - High Qu		
Do you have any o If you don't agree	comments on this draft policy? with the proposed policy please set out why and what alternative pave missed something?	approach would you suggest?
	 Need to take into account aging population with mobility needs. Need to be mindful of flooding and transport issues. 	Noted – some of these issues fall outside the scope of the design policy and are covered by other policies within the local plan.
DCLP/89 Mr Dennis Marchant	The policy is supported.	Noted – support for the policy is welcomed.
DCLP/144	The policy must be strong enough to be implemented and high	Noted and agreed.
County Councillor	enough on the council's priorities.	Noted – the policy makes explicit reference to requiring developments
Max Hunt	Design must enable maximum reduction of carbon emissions	to reduce their impacts upon, and be resilient to, the effects of climate

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	 and lessons must be taken from Goldsmith Street in Norwich (winners of the Stirling prize). In order to support 'active lifestyles' dwellings (especially flats) should be equipped with secure but easily accessible cycle storage. The aspects of design expressed in the policy are often available in larger developments. In terms of respect for the character of an area, I would like to add 'heritage' and sense of place. This is easily overlooked on greenfield sites but easily enhanced with a 'percent for public art' policy and street naming which reflects the locality in environmental or historical terms. In terms of encouraging social interaction, we need indoor spaces to, including community halls. It has taken far too for Grange Park development to create a community hub and depended on a few active citizens with the skills that aren't available in all communities. 	 change. Noted – consideration will be given to making reference to cycle storage in the design policy or the sustainable transport policy. Noted. Noted – consideration will be given to making reference to heritage in the policy. Consideration will be given to including reference to how public art can contribute to good design. Noted – consideration will be given to making reference to community halls and similar facilities
DCLP/179 Mr Joseph Hall	• References to providing attractive, safe and well managed spaces to support active lifestyles and defined, legible and multi-functional streets are welcome. This will ensure physical activity is supported through good design.	 Noted – support for the policy is welcomed.
DCLP/206 Mr John Owens	 There should be strong support for developers to use environmentally positive features. Many options, such as ground source heat exchange, are best considered for communal use and at design stage. Connections to Loughborough University should be used regarding emerging energy technologies The plan should show a positive weight towards innovative buildings not merely a low stretch standard. 	 Noted – the policy requires developments to reduce their impacts upon, and be resilient to, the effects of climate change in accordance with Draft Policy LP30 (sustainable construction) which address these issues and is aimed at driving up the quality and energy standards of new developments. Noted – the policy's reasoned justification identifies that innovative and original designs can play a role in helping to reinforce local distinctiveness and achieve high standards of architectural quality.
DCLP/219 Professor David Infield	 Although the Building for Life12 guidance is useful this needs to be supplemented by thermal performance requirements. Given the lifetime of new housing and the present Climate Emergency, this should be the so called Passive House Standard or an equivalent net zero emissions requirement. 	 Noted – the policy requires developments to reduce their impacts upon, and be resilient to, the effects of climate change in accordance with Draft Policy LP30 (sustainable construction) which address these issues and is aimed at driving up the quality and energy standards of new developments.
DCLP/228 Mr Gideon Cumming	 A) The policy should require new developments achieve Building for Life (BfL) 12 standards. Furthermore, where existing buildings are demolished to make way for new development there should be a minimum requirement to achieve a BfL12 Green status. 	 Noted – consideration will be given to whether meeting BfL standards should be included in the wording of the policy.
DCLP/250 and DCLP/257	 We welcome a focus on high quality design of new developments and therefore support this draft Policy. 	 Noted – support for the policy is welcomed. Noted – consideration will be given to whether clarification is required.

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Vale Planning Consultants	B) Clarity should be provided in respect of what is required by an Independent Design Review, under what circumstances a review will be sought and what format this should take.	
DCLP/324 Mr Phil Sheppard	 All good stuff but there are still examples of bad design in recent new developments. Buildings and developments should not be designed for long life without also having modularity - that is, designed to be easy to change according to new functional needs and aesthetics. The Victorians did some great things, but they left us with some buildings and streets which hold us back now. 	 Noted – the reasoned justification identifies that an improvement in design quality is required and the policy seeks to achieve this. Noted – the policy includes a requirement that new developments function well and add to the quality of the area not just in the short term but over the lifetime of the development.
DCLP/351 Mr John Barton	 Stop obsessing about the 'character' of an area. Buildings are meant to be used, not just looked at. They need to be affordable and energy efficient. Why are we stuck with brick-based building methods? System built buildings can be cheaper, faster to build, just as long-lasting and better insulated. 	 Good design incorporates more than just appearance and includes energy efficiency and is a fundamental part of what the planning process seeks to achive. Noted – the purpose of the policy is set a framework that supports good design whatever materials or building methods are used.
DCLP/393 Dr Martin Field	 New housing developments should make use of 'Homes for Life' principles, with suitable accessibility and adaptability to meet the potential changing needs of residents in the future. Neighbourhood design values such as 'cohousing' should be encouraged. b) The Local Plan policy needs to incorporate opportunities for community-led neighbourhood development to come forward. More submissions of community-centred visions for 'high quality' design, perhaps through targeted competitions at a level whereby lay communities can engage, should be encouraged. 	 Noted – the policy requires new developments to function well and add to the quality of the area, not just in the short term but over the lifetime of the development. c) Noted – the purpose of the policy is set a framework that supports good design whether this is community led or not. Consideration will be given to referring to the guidance provided on community engagement in the Government's Planning Practice Guidance.
DCLP/411 Mr Martin Smith	• I think the design standards in Charnwood are poor. The public amenity spaces is miserable. The policy should aim for the very highest standards. There are excellent examples of high density "low rise" developments and such standards should be set.	 Noted – the reasoned justification identifies that an improvement in design quality is required and the policy seeks to achieve this.
LDCLP/02 Anonymous	More independent reviews	 Noted – support for the principles of the policy is welcomed. The draft policy seeks independent reviews for strategic or sensitive schemes and consideration will be given to whether clarification of these terms is required.
LDCLP/34 Anonymous	Whatever course is taken high rise buildings should be avoided.	High rise developments can be examples of good design. All developments should respect and enhance the character of the area and high rise developments will therefore only be suitable in certain locations
EDCLP/55 Sileby Parish Council	 General approach to securing high quality design is supported. 	 Noted – support for the policy is welcomed.

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EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	 Supports this policy and provides examples of good design practice that it includes within its developments. 	 Noted – support for the policy is welcomed.
EDCLP/74 Mr Hussain	 Policy will create a lot of unnecessary work if it fails to acknowledge the wider benefits of a more simplified housing solution that focuses on providing housing that is needed more quickly and enables people to lead a normal social and family life with dignity. 	 Noted – ensuring that buildings and developments are of high quality design is important in providing people with a good quality of life and its importance and breadth of scope is recognised in the National Planning Policy Framework.
EDCLP/80 Historic England	 Heritage assets and their settings could be referenced within policy LP2. 	 Noted – consideration will be given to whether reference to heritage assets and their settings should be included.
EDCLP/95 Barrow Upon Soar Parish Council	 The creation of high-quality buildings and places is fundamental to what the planning process should achieve. Local people are concerned that too many recent developments have consisted of standard, 'identikit' homes that bear no resemblance to local character. In our survey 96% said that the design and layout of new developments should respect and reflect the characteristics and appearance of the village by incorporating locally distinctive features. We are therefore concerned that Draft Policy LP2 does not set out a clear design vision and expectations that match local aspirations. The original Barrow upon Soar Village Design Statement (VDS) has now been updated and is set out in our Neighbourhood Plan. The revised VDS describes the distinctive character of Barrow upon Soar and highlights the qualities valued by its residents. From these qualities, design principles, based on the distinctive local character of the village, have been drawn up to guide development. The policy does not adequately cross reference the Barrow upon Soar VDS as contained within the Neighbourhood Plan. 	 Noted and agreed. Noted – the reasoned justification identifies that an improvement in design quality is required and the policy seeks to achieve this. The Council has recently adopted a supplementary planning document on design and the Government has issued a National Design Guide, both of which are material considerations in determining planning applications. The policy relates to the whole of the Borough. The Neighbourhood Plan forms part of the development plan for determining planning applications in Barrow upon Soar and its policies on design will therefore also be used.
EDCLP/125 Tim Birkinshaw	 Many recent developments around Loughborough have been poorly laid out from a walking and cycling perspective, with mazes of cul-de-sacs linked by narrow jitties. Developments have been dominated by car parking spaces and cramped gardens with amenities (open and plays spaces) peripheral to the housing. A return to more traditional layouts (straighter streets, possibly terrace housing) with better use of space (less road/driveways), more gardens would give less unsustainable housing, possibly allowing higher densities. 	2) Noted – the reasoned justification identifies that an improvement in design quality is required and the policy seeks to achieve this. The Council has recently adopted a supplementary planning document on design and the Government has issued a National Design Guide, both of which are material considerations in determining planning applications.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 The policy contains commendable objectives. The reference to climate change and Policy LP30 is important but there should also be a reference to contributing to the mitigation of climate change in the introduction to the policy. If this policy is to secure high design standards, it has to be more than a tick box approach. It will require robust monitoring by an experienced design officer (architect) who should be appointed to evaluate schemes and negotiate acceptable design outcomes. Where Village Design Statements are incorporated into adopted Neighbourhood Plans they should become part of the Local Plan and have statutory force. LP2 should emphasise and encourage this provision. 	 Noted – support for the principles of the policy is welcomed. Reference is made to tackling climate change in paragraph 4.40. Consideration will be given to whether this is the most appropriate term. The Council has officers in the Conservation and Built Environment Team who provide advice on the design aspects of development proposals. 4) Made neighbourhood plans form part of the development plan and have statutory force for determining planning applications in those areas. Consideration will be given to whether reference to village design statements should be included in the reasoned justification.
EDCLP/147 Hoton Parish Council	 Well designed development should incorporate walking/cycling/public transport connections both inside and outside the development. 	 Noted – support for the principles of the policy is welcomed. Walking and cycling are referred to in the policy's requirements relating to supporting active lifestyles. Provision of public transport is not a design consideration but is covered by the plan's policies on sustainable transport (Draft Policy LP33).
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	 Share the view in the document that much recent development has been of poor design and mediocre quality. Proposals which are clearly not appropriate or locally distinctive should be rejected and the policy must be applied rigorously. Good schemes should be highlighted and the Charnwood Design Awards are commended. Does the Borough Council have a design champion and/or a design panel which reviews proposals and can apply the appropriate benchmark? 	 Noted. Noted and agreed. Noted – support for the scheme is welcomed. The Council has officers in the Conservation and Built Environment Team who provide advice on the design aspects of development proposals.
EDCLP/165 Dr S.J. Bullman	 The main failing here is citing draft policy LP 30, which is much weaker than it should be, and, being at the end, seems to be almost an afterthought, when it should be a priority. Designs for all new builds should include: low-loss walls low-loss ceilings triple glazing windows triple glazing skylights solar water heating, PV solar panels heat pumps as a heating source underfloor heating to maximise heating efficiency and breadth of sources. 	 Noted – design is relevant to a wide range of considerations regarding sustainable development and all of the matters listed in the policy are of equal importance in decision making. 5) The policy and LP30 provide an appropriate evidence-based set of requirements for planning decisions. Further technical requirements may be set out through the Building Regulations regime.

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EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	 Further clarity is required regarding the introduction of design reviews, either through draft policy LP2 of the associated SPD that is referred to. Further information should be provided regarding proposals that are likely to require design review; and the process that the Council will go through to implement this, including likely timescales and costs. Considered particularly important in light of the Council's preferred approach in pursuing a low growth option, and the associated risk that this carries in ensuring a five year supply of housing land is maintained, so that design reviews can be properly accounted for in development programmes and the risk of unforeseen delays in the delivery of larger sites reduced. 	 Noted – the draft policy seeks independent reviews for strategic or sensitive schemes and consideration will be given to whether clarification of these terms is required and that there is a link between when reviews are required and why they are required. Noted – consideration will be given to providing further information regarding the design review process and the appropriate place for that. Noted.
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	 Whilst we support the general aspirations of this policy in seeking to promote high quality design, further clarification is required in relation to the requirement for independent design reviews of strategic or development sites. In the first instance, there needs to be justification for why such reviews are required. Secondly, the policy needs to provide more clarity as to when such reviews will be requested, so that developers can have certainty as to the requirements of the policy and factor in the costs and delays of the reviews accordingly. 	• Noted – support for the principles of the policy is welcomed. The principle of using design reviews is supported by the NPPF. The draft policy seeks independent reviews for strategic or sensitive schemes and consideration will be given to whether clarification of these terms is required and that there is a link between when reviews are required and why they are required.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	 We would add the following to the requirements of new developments: Provide a net gain for biodiversity (as per NPPF) Contribute to a nature recovery network (to see a reversal of declines, recovery of species populations and a to contribute to a functioning ecological network. 	 Noted and agreed. These matters are dealt with in more detail in the section of the plan on biodiversity.
EDCLP/226 Eleanor Hood	 The policy is fine, but several recent developments have not met BfL12 design requirements. Planning permission must only be allowed where the design is of sufficient quality to meet these requirements. 	 Noted – support for the policy is welcomed. The reasoned justification acknowledges that design quality should be improved and the policy seeks to achieve this. Noted and agreed that development proposals that are of poor design should be refused permission.
EDCLP/254 Ian Deverell Turley on behalf of Rainier Developments Ltd)	 Support the Council's approach to seek for development to contribute to the character, appearance and identity of Charnwood through the use of building materials, scale and massing to reflect their immediate location. Such an approach is consistent with the overall approach to delivering high quality design expressed in national policy. Provides information about for proposed development to east and west of Iveshead Road, Shepshed and its design approach. 	 Noted – support for the policy is welcomed. Noted.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/255 Ian Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	 Support the Council's approach to seek for development to contribute to the character, appearance and identity of Charnwood through the use of building materials, scale and massing to reflect their immediate location. Such an approach is consistent with the overall approach to delivering high quality design expressed in national policy. Provides information about for proposed development south of East Road, Wymeswold and its design approach. 	 Noted – support for the policy is welcomed. Noted
EDCLP/231 CBC Neighbourhoods and Community Well Being	 Provision of accessible open space, sport and community facilities is integral to high quality design. Request that specific reference is made to the Sport England Active Design Guidance and The Ten Principles of Active Design to ensure all new developments are of high quality and support sustainable communities. Community Facilities - Policy should recognise the full range of facilities that are required to support a community/development and not just refer to amenity spaces. The location of these community facilities e.g. co-location is also important and the role this has in encouraging active travel. Section 17 of the Crime and Disorder Act 1998, as amended by the Police and Justice Act 2006, requires responsible authorities to consider crime and disorder (including antisocial behaviour and other behaviour adversely affecting the local environment); and the misuse of drugs, alcohol and other substances in the exercise of all their duties, activities and decision-making. The cumulative effects/impact of developments on community infrastructure needs to be fully considered and planned for in accordance with relevant regulations. 	 Noted and agreed. Noted – reference to Sport England Guidance will be considered Noted – policies in relation to the provision of infrastructure and community facilities appear elsewhere in the draft local plan. Consideration will be given to referring to optimising location of facilities as a design consideration. Noted – amendments to the text will be considered to clarify that duty under section 17 has been discharged. Noted – the draft local plan is accompanied by a sustainability appraisal that assesses these impacts.
ELDCP/192 Severn Trent Water	 Recognise the need for and benefits of delivering good quality design and supportive of the general principle behind policy LP2. However, if does not highlight some key areas that need to be considered as part of the design process. In particular CIRIA C753 (SuDS Manual) identifies that drainage should be considered at an early stage of site design to ensure that the site layout and scale is able to accommodate the necessary features that will deliver both the water quantity, water quality, biodiversity and amenity benefits. 	 Noted – support for the principles of the policy is welcomed. Noted – the policy on Sustainable Drainage Systems (SuDS) (Draft Policy LP32) would require SuDS to be considered at the masterplanning stage of the development process for all major developments.
EDCLP/190 Sport England	 Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that sets out ten key principles for ensuring 	 Noted – the policy and its reasoned justification recognise role of good design in supporting active, healthy communities. Consideration will be given to referring to 'Active Design' and/or its contents.

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	 new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. 6) Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of major new housing and mixed use development schemes has a vital role in providing easy access to a choice of opportunities for sport and physical activity, making new communities more active and healthy. 	
EDCLP/159 C. Mulvaney	 I agree with Draft Policy LP2. In order to provide attractive, safe and well managed public and private amenity spaces which support active lifestyles we need to be mindful of spaces we currently have and protect them. I draw your attention to my comments regarding sites HS33 and HS34. New development should be in keeping with the character of surrounding environs and in some cases may need to be designed to restore lost character, e.g. in the town centre. Design should minimise or mitigate environmental impacts, for example, if there is loss of land due to new development, any building plans should include green spaces, spaces for trees, and green roofs which enable the new build to blend into its surroundings and soak up rain fall thus reducing the risk of flooding. 	 Noted – support is welcomed. Noted – the policy is concerned with the design of new developments. An evidence based process supported by a sustainability appraisal has been used to identify the proposed housing allocations. This will be reviewed in the light of all the representations that have been received during the consultation period. Noted and agreed. 8) Noted – the policy seeks designs which provide amenity spaces and reduce their impacts upon, and are resilient to, the effects of climate change.
EDCLP/153 East Goscote Parish Council	 There is no standard figure for how many dwellings can be accommodated within a hectare of development land. There are examples of different densities being proposed as appropriate at different times and in different places. While very high densities are not suitable in all settings, in general, higher densities help to minimise environmental impact in a number of ways. The Plan does not publish the area of allocated housing sites and it isn't possible to determine whether sites have been allocated at an appropriate density. This is a significant omission. 	 Noted - the draft local plan follows the National Planning Policy Framework in balancing seeking the effective use of land, meeting identified need in terms of types and sizes of homes and seeking design that has regard for urban form in its vicinity. The Borough is able to meet local housing need without specifying minimum density standards. Consideration will be given to providing information regarding the area of allocated sites.
EDCLP/ 245 Avison Young obo Loughborough	 Acknowledges that achieving a high standard of design is crucial to the delivery of sustainable development, welcomes the policy and believe that it accords with the provisions of national planning policy. 	Noted – support for the policy is welcomed.

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University EDCLP/239 Vivienne Barratt- Peacock	 Policy supported • 	 Noted – support for the policy is welcomed.
EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	 Further clarity is required regarding the introduction of design reviews, either through draft policy LP2 of the associated SPD that is referred to. Further information should be provided regarding proposals that are likely to require design review; and the process that the Council will go through to implement this, including likely timescales and costs. Considered particularly important in light of the Council's preferred approach in pursuing a low growth option, and the associated risk that this carries in ensuring a five year supply of housing land is maintained, so that design reviews can be properly accounted for in development programmes and the risk of unforeseen delays in the delivery of larger sites reduced. 	 Noted – the draft policy seeks independent reviews for strategic or sensitive schemes and consideration will be given to whether clarification of these terms is required and that there is a link between when reviews are required and why they are required. Noted – consideration will be given to providing further information regarding the design review process and the appropriate place for that. Noted.
EDCLP/252 Leicestershire County Council	 It is requested that a further bullet point to draft Policy LP2 on high quality design is added as follows: Create places that work for both people and wildlife. 	 Noted – biodiversity is considered in the supplementary planning document on design but consideration will be given to whether it should also be specifically be referred to in the policy.
EDCLP/252 Leicestershire County Council	High quality design and materials is to be commended but it is also important to consider ongoing / long-term maintenance. As non-standard materials can be costlier to maintain, suitable resource should be secured to fund ongoing long-term maintenance	 Noted – consultation will take place with the Highway Authority regarding any proposals affecting the public highway including any requirements for developer contributions.
EDCLP/252 Leicestershire County Council	 The following wording should be added: We will require new developments to make a positive contribution to Charnwood, byand provide attractive and functional places that meet the current and future needs of the stakeholders, where people will want to live. 	 Noted – additional wording will be considered.
Leicestershire County Council	• The word biodiversity should be added into the sentence on respect and enhance the character of the area, having due regard to 'biodiversity'	 Noted – biodiversity is considered in the supplementary planning document on design but consideration will be given to whether it should also be specifically be referred to in the policy.
EDCLP/252 Leicestershire County Council (Highway Authority)	 Supports the principle that developments should contribute towards the quality of the area and for that to be over the lifetime of the development. Would expect the Local Plan to set out how this is expected to be achieved in practice, in terms of the use of any non-standard materials or items proposed to be used within the public highway (e.g. through the use of commuted sums). 	 Noted – support for the principles of the policy is welcomed. Noted – consultation will take place with the Highway Authority regarding any proposals affecting the public highway including any requirements for developer contributions.
EDCLP/252	Draft Policy LP2 omits any mention of new design to mitigate	The policy requires developments to reduce their impacts upon, and be

County CouncilharvestEDCLP/271 Lichfields on behalf of St Philips• General concern strategi • Conside represe all strat review the imp does no develop • There is whethe	t climate change – ground source heat pumps, rainwater sting, green roofs, wind turbines etc. ally agrees with this draft policy, but raises significant on with the requirement for independent design reviews for gic or sensitive development schemes. ders that this requirement is unduly onerous and ents a blanket condition that would unreasonably apply to tegic housing schemes, contrary to purpose of design as advised by the PPG 14: Whilst the PPG recognises portance of design review for all scale of development, it not advise on its use for each and every strategic pment scheme.	 resilient to, the effects of climate change in accordance with Draft Policy LP30 (sustainable construction) which address these issues. Noted – support for the principles of the policy is welcomed. The draft policy seeks independent reviews for strategic or sensitive schemes and consideration will be given to whether clarification of these terms is required and that there is a link between when reviews are required and why they are required. Noted – the reasoned justification identifies that an improvement in design quality is required and the policy seeks to achieve this. Historically, design reviews have been undertaken on developments which are not local plan allocations and therefore inclusion in the design policy is appropriate.
Lichfields on behalf of St Philips • Conside represe all strat review the imp does no develop • There is whethe	n with the requirement for independent design reviews for the provided of the provided and	 policy seeks independent reviews for strategic or sensitive schemes and consideration will be given to whether clarification of these terms is required and that there is a link between when reviews are required and why they are required. Noted – the reasoned justification identifies that an improvement in design quality is required and the policy seeks to achieve this. Historically, design reviews have been undertaken on developments which are not local plan allocations and therefore inclusion in the
 need for ensure that 'are a review To be of policies be remainded by that the design In additing 	nmends an alternative approach which recognises the or design review on a case-by-case basis which would that such a requirement would apply only to schemes re significant enough to warrant the investment needed for	Noted - the Council will set out further clarification on its position on design reviews in the submission draft, taking account of your comment.
RPS obo Bellway Homes scheme • Therefor and not	elcome the implementation of well-designed high-quality es and consider that well-designed housing need not sarily harm the local landscape and biodiversity. ore, high quality design can be applied and still achieve of detract from the housing numbers required for the high scenario.	 Noted – support for the principles of the policy is welcomed.
Chapter 5 - Housing		A
Q8 - LP3 - Housing Sites (a) We have followed a process informed by our strategy and a sustainability appraisal to identify the sites allocated for housing set out in the Draft		
	ese are the right sites? If not, what changes or alternati	
	agree. Sites that have recently had planning permission by parish councils, CBC and recent planning decisions	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through

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Collington	ruled on by inspectors ie Barnard Drive, Rearsby and Goscote should be exempt and not put back into this plan otherwise villagers will lose faith in the planning process and CBC decision making. What is the point in having an inquiry to then go against the inspectors decision?	consultation. Sites have been objectively assessed in the SHLAA, and through the SA.
DCLP/174	the inspectors decision? Shepshed has been allocated to much housing in recent years.	Evidence will be reviewed in light of this representation. The preferred development strategy is an urban concentration and
County Councillor Max Hunt	This small town has seen far more housing that it is able to digest socially, economically or in the housing market. This is a view widely held. The reason for the current proposals for Shepshed rests on the Plan's political imperative to opt for none of the preferred strategy options in 4.28. The authors have therefore been forced, at this stage of the Plan, to hunt for sites to fit the figures led by political expedience amongst other considerations. The small town of Shepshed has a tradition of excellent voluntary services as well as commercial services. Yet these will find it difficult to scale up for a greater population - as the Plan itself supports that view (See 6.38. & 6.39). I have heard the proposed development described as the <i>onion skin approach</i> , where layer upon layer of housing is built surrounding central services that cannot cope with unsuitable infrastructure. In these circumstances a new settlement is the better solution and the preferred strategy should be reviewed in that light. There are already other options. Under the previous Plan consultation a development between Cotes and Hoton was proposed. This answers many needs and offers a more creative canvass for the Borough's planners working with developers. The masterplan exists the from previous Plan process. Cotes/Hoton is the closest of all sites to the train station and Loughborough, as well as rail to all compass points. The previous masterplan protected the meadow area and provided excellent walking and cycle access to the town. The flood plane was also protected and the A60 was set to be improved to give further protection.	 intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 2,000 additional dwellings to Shepshed) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The possibility of a new settlement was considered within the SA as part of four different 'high-level' housing growth scenarios / distribution options; and two 'refined' options. Site proposals in Cotes / Hoton have been submitted during the consultation on the local plan. These will be assessed as part of finalising the local plan.
	sustain the east of the town.	
DCLP/342 Dr Anthony Kay	Some of the proposed housing sites do not accord well with the policy of "urban concentration and intensification". Specifically:- More generally, the scale of housing development proposed for Shepshed would exacerbate the problems discussed elsewhere in	The overall strategy for growth is one of urban concentration and intensification. Policy LP1 specifically identifies making the efficient use of land including brownfield or underused land and buildings. The Council maintains a Brownfield Land Register that is used to ensure brownfield

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	the Plan with relation to the town centre and the narrow roads which could not easily accommodate more traffic. Having complained about some of the proposals, I would like to welcome the efforts that have been made to find sites within existing built-up areas, in particular sites HS17-32 within Loughborough. Stronger policies to direct development first to brownfield sites would be useful.	sites can be easily identified and come forward for development.
DCLP/401 Mr. Alan Holland	HS38 - HS49. As a general point, the proposed development of 2041 additional homes would have major consequences for local infrastructure, environment and services, which are already stretched.	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
DCLP/423 Mr Martin Smith	The sites in Other Settlements are not sustainable. There are virtually no employment opportunities in Cossington, Queniborough or Reasby, all residents will add to traffic on already busy roads. A greater allocation must be made to areas with employment and where no motorised commuting can be achieved. Children should be able to walk and cycle to school. With no jobs, no shops, no facilities for the elderly, more housing in Cossington will only increase traffic and pollution on congested roads. Road connection decreases uptake of cycling and walking Cossington has suffered from flooding again this year. Additional housing can not help alleviate that problem. More green areas are required for flood relief, not less. SUDS draining is not a long term substitute for flood management and has and notable failures from inadequate design, poor execution and failure in maintenance. The scale of housing planned for Cossington is not compatible with the conservation status of the village.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The 945 homes proposed for the Other Settlements in the development strategy represents 5% of the overall planned housing provision.
LDCLP/02 Anonymous	Yes, but build less housing we need to have different housing types	Draft Policy LP4 and LP6 provide the policy framework to deliver the right type, tenure, and mix of housing to meet local needs.
LDCLP/51 Anonymous	No, brownfield/derelict/under used land first. We can't built out and out forever.	The overall strategy for growth is one of urban concentration and intensification. Policy LP1 specifically identifies making the efficient use of land including brownfield or underused land and buildings. The Council maintains a Brownfield Land Register that is used to ensure brownfield sites can be easily identified and come forward for development.
EDCLP/52 Shepshed Town Council	'In the case of sites in close proximity to the Black Brook west of Shepshed, are accompanied by a jointly produced biodiversity strategy to collectively mitigate the potential significant adverse effects of the development of these sites on biodiversity interests'.	The biodiversity strategy for the sites in Shepshed has not yet been produced. The intention of the wording in Draft Policy LP3 is to ensure that those sites identified in Shepshed (HS39, HS41, HS42, HS44, and HS48)
	Has this strategy been published yet? Where can it be found? It is noted that almost all proposed houses in Shepshed are on	collaborate to produce a joint biodiversity strategy to mitigate impacts.

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	greenfield land, some of them within the National Forest Boundary. It doesn't take into account or cater for flooding as developers do not retain ditches, therefore, increasing the risk of flooding in Loughborough and the listed Water Mill in Shepshed.	
	'Our Sustainability Appraisal highlights the collect effect of sites west of Shepshed, which means there is potential for significant adverse effects on biodiversity. It is therefore considered essential to set a biodiversity strategy that seeks to improve connectivity between habitats and secure strategic improvements. Provision of a buffer between the developable parts of the sites and the river corridor is important, as it is the need to provide areas for recreation that take pressure off existing woodland areas.'	
	We have no confidence or evidence that they care.	
EDCLP/59 Anonymous	I strongly support the principles set out in Draft Policy LP3, and specifically the importance attached to biodiversity and 'the separate character of settlements and landscape'. These principles are vital for Charnwood as a whole, but particularly to the Service Centres (pp.38/39) which are already experiencing significant growth. Without strict adherence to the principles in practice, there is a major danger of continuous ribbon development from Loughborough through the Soar Valley villages. As a resident of Quorn this threat is acute as only a limited Area of Separation distinguishes it from Loughborough. It is vital that this entire area is conserved between Loughborough and Quorn in order that the important principles in Draft Policy LP3 are upheld. (My comments on Q21 are also relevant.)	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/74 Mr Hussain	As long as social housing landlords are empowered to take on a greater responsibility and are entirely grant funded to combine their professionalism with adequate housing in juxtaposition to earlier suggestions, then the allocation of land for proposed development pales into insignificance and should only therefore be considered when there is an actual shortage of homes. There is a social responsibility to be addressed & I'm just not seeing it in the borough's plan, it is far too unnecessarily long-winded, disrupts the environment and no doubt has so far endured a substantial cost attached into its production without even	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The SA is based upon the consideration of 14 objectives, which include: Objective 9 ('reduce poverty and deprivation'); Objective 10 ('promote health and active lifestyles in the borough'); Objective 11 ('improve
	responsibly addressing the most fundamental point of the borough's position for eradicating poverty in Loughborough? How is this societal decline even being addressed in the borough's plan?	access to affordable housing and ensure an appropriate mix of dwelling sizes, types and tenures within local communities'); Objective 12 ('promote a sustainable and diversified economy, and improve skills and employability'); and Objective 13 ('increase access to a wide range of

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		services and facilities').
		Taken together, the consideration of these objectives and the use of them to appraise the possible growth options and draft policies, means that matters of poverty, access to housing, and social deprivation have been central to the formulation of the draft local plan.
EDCLP/80 Historic England	Historic England promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape	Paragraphs 187 and 189 of the NPPF provide a policy framework at the national level, and there is no need for the draft local plan to duplicate the requirements relating to archaeology.
	components of the historic environment. The historic environment should therefore play a critical role in sustainable development at the heart of all spatial planning work, as reflected within the National Planning Policy Framework (NPPF).	However, whilst archaeological issues are referenced in Draft Policy LP24, the Council would welcome the opportunity to work with HE to strengthen the policy wording (where appropriate).
	We recommend that local authority conservation expertise should be used in relation to all heritage assets. In particular professional archaeological expertise will also be required given the comments raised in relation to archaeology for proposed site allocations; in any case archaeological advice should be sought together with that of your local authority conservation expertise in relation to both local plan policies and all site allocations.	
	Please note that Historic England have published advice notes. They may be of relevance to the Local Plan. Specifically, Good Practice Advice Note 1: Local Plan Making, Good Practice Advice Note 3: Setting and Views and Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans may be of particular interest to you and may provide additional information in relation to our answers to your consultation questions. These can be accessed via the following link: https://historicengland.org.uk/advice/planning/planning-system/	
EDCLP/82	I wish to object to the Draft Charnwood Local Plan 2019 -2036.	The preferred development strategy is an urban concentration and
Mrs Paula Freckelton	Specifically my objection relates to all the proposed development in Shepshed and particularly to the proposed developments off the A512 Ashby Road West. In recent years there has been an unprecedented amount of new building in Shepshed but that has not been matched by the provision of new facilities and infrastructure. The road through the town remains wholly inadequate; the Doctors surgeries are	intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 2,000 additional dwellings to Shepshed) is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	overstretched and the shopping woeful. There are also inadequate school places to cater for the number of children in the town at the	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.

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	present time and the additional housing proposed will mean that even more children have to travel to neighbouring towns for their schooling. At present there is far too much traffic on the A512 Ashby Road and even without the present incompetently organized roadworks traffic regularly backs up leading to considerable delays. Therefore any further developments which results in even more traffic joining the A 512 is wholly unacceptable. I trust you will take these objections into account and consider alternative sites in other towns where there has been far less development in recent years.	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
EDCLP/108 Sue Barry	Just stop building large housing developments on Greenfield sites. We all have big concerns with environmental changes, areas flooding which don't normally flood. No matter how much drainage goes in, the surface water surely has to go somewhere. Leave the natural landscape alone.	Environmental issues and the impact of new development on the environment are key themes within the draft local plan; and are Council priorities. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/121 Marie Birkinshaw	Agree, but note 5.25, starter homes on unviable commercial sites would need public transport access made available before the homes are occupied so people can go to work without needing cars.	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
EDCLP/125 Tim Birkinshaw	I believe the vested interests in these sites for building should be published as part of the consultation.	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.Sites have been objectively assessed in the SHLAA, and through the SA.Evidence will be reviewed in light of this representation.
EDCLP/143 CPRE Leicestershire and its	In response to this question, we have a few general comments to make:a) Given our response to Q4, we do not necessarily think that all these sites are the right ones, especially in the Soar and	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.
Charnwood District Group	 Wreake Valleys. b) Given our response to Q36, information should be provided in the Plan on the flood risk status of sites. c) The proposed allocations include sites which previously 	Sites have been objectively assessed in the SHLAA, and through the SA. This includes a consideration of flood risk, and the site's flood risk classification.

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	have been refused permission, e.g. East Goscote, but no evidence is submitted as to how previous objections have been overcome. Public Transport, traffic and car parking receive little attention and are a particular problem in many 'other settlements'.	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
EDCLP/146 Woodland Trust	Our concern is that several of the site allocations listed in your draft plan are adjacent to ancient woodland and may have adverse impacts on these woods and the wildlife within them. [provided against relevant site]. <u>Ancient Woodland</u> Natural England defines ancient woodland "as an irreplaceable habitat [which] is important for its: wildlife (which include rare and threatened species); soils; recreational value; cultural, historical and landscape value [which] has been wooded continuously since at least 1600AD." It includes: "Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration Plantations on ancient woodland sites – [PAWS] replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi" Both ASNW and PAWS woodland are given equal protection in the National Planning Policy Framework (NPPF) regardless of the woodland's condition. <u>National Planning Policy</u> Framework, paragraph 175 states: "When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable	The potential impact of development on woodland, ancient woodland, locally important wooded areas, and veteran trees, is a key issue for the Council. The policy framework provided by the NPPF, in conjunction with the first bullet point listed in Draft Policy LP3, Draft Policy LP20, Draft Policy LP22, and Draft Policy LP23 give sufficient protection to the woodland assets across the borough. Should development sites progress to planning application stage, the policy framework, and the Development Management process will allow for any buffer areas (where shown to be required) to be secured through condition. This representation will be used to inform the next stage of local plan- making.

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	 Veteran Trees states: ""Nearby development can also have an indirect impact on ancient woodland or veteran trees and the species they support. These can include: breaking up or destroying connections between woodlands and veteran trees 	
	 reducing the amount of semi-natural habitats next to ancient woodland and other habitats increasing the amount of pollution, including dust increasing disturbance to wildlife from additional traffic and visitors 	
	increasing light pollution	

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	 increasing damaging activities like fly-tipping and the impact of domestic pets changing the landscape character of the area" 	
	Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and Natural England recommend "For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic."	
	<u>Conclusion</u> The Trust is concerned about the potentially adverse impacts that the proposed development will have in relation to areas of adjacent ancient woodland.	
	The Woodland Trust requests that buffer zones of adequate size is included with each of the site allocations we have listed to ensure the ancient woodland is adequately protected from the impact of adjacent development. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.	
EDCLP/147 Hoton Parish Council	There is no option given to agree/disagree with the wording of the bullet points in the criteria for development. We should like to question why only access to education is necessary – what about healthcare? Some of the sites in the list would only be suitable if they are accompanied by infrastructure which will resolve the issues that have already arisen from a succession of large developments in villages and service centres without considering the cumulative impact. In some service centres a new school or health centre will be needed, rather than token s.106 contribution to tag a new classroom or surgery onto the existing one.	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. Requirements for all types of infrastructure will be assessed. Where evidence supports the need for new development to provide new infrastructure, this will be set out in the IDP, and secured through the Development Management process.
EDCLP/268 Forest House Surgery	We have been informed that there is going to be a large housing development in Shepshed and the surrounding area. This will add pressure to the Primary Care Services provided by Forest House Surgery. Background	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The evidence in this response will be used to shape the next stage of the draft local plan.

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	Forest House Surgery is the largest Surgery in Shepshed and currently holds a list size of 11,814 patients. Due to our open list policy, our list size has increased by 300 patients over the last 12 months. As you know, there is a single handed practitioner, who is not able to expand his practice list, and therefore, Forest House Surgery has become the default practice in Shepshed for patient registrations. Shepshed is a growing town with an increasing population. We care for the largest number of Care Homes (holding around 300 patients) in North Charnwood. As a practice we have a high percentage of over 60 year olds and multi-comorbidity patients.	The Council welcomes the opportunity to discuss the impacts on the surgery with both the practice themselves, and the CCG.
	Forecasted Pressure on Forest House Surgery: Workload	
	 Expanding list size will increase workload pressure on Forest House Surgery Increase in registrations Medication management, including prescribing Primary care Services, including appointments with Clinicians 	
	 Pressure on chronic disease clinics, including Diabetes, Asthma, COPD etc Pressure on Reception due to increase of population Premises Currently Forest House Surgery has 16 Clinical Rooms and this is 	
	just meeting the current demands. If Forest House Surgery was to increase its list size due to the proposed housing development, then Forest House Surgery would require an expansion of space to avoid breaking point. Forest House Surgery, therefore, would need access to 106 money 'up-front' in order to invest in the	
	infrastructure, by means of an extension to the current building. Forest House Surgery would request the council to consider giving planning permission for our Grade II listed building. Workforce We know that General Practice is currently finding difficulty in	
	recruiting GP's Nurses, and non –clinical staff; hence any increase in list size will have a further impact on our current workforce.	
EDCLP/165 Dr S.J.Bullman	See Question 4	Noted.
EDCLP/187 Jim Smith	There seems to have been a lot of crystal ball gazing done to inform the availability of development land, and yet there does not	Neighbourhood Plans are a critical part of the policy framework in the borough. Regard will be had to all emerged and adopted Neighbourhood
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	seem to be any reference to any Neighbourhood Plans.	Plans.
EDCLP/224 Paul Newton	"in the case of sites in close proximity to the Black Brook west of Shepshed (sites HS39, HS41, HS42, HS44 and HS48), are accompanied by a jointly produced biodiversity strategy to collectively mitigate the potential significant adverse effects of the	The biodiversity strategy for the sites in Shepshed has not yet been produced. The intention of the wording in Draft Policy LP3 is to ensure that those
	development of these sites on biodiversity interests"	sites identified in Shepshed (HS39, HS41, HS42, HS44, and HS48) collaborate to produce a joint biodiversity strategy to mitigate impacts.
	It is not clear to me how this strategy will be produced (accurately) if these developments occur in a piecemeal manner. Is it intended to produce the strategy prior to any of the developments? If so, what assumptions for all the developments will be made? Not clear how this will work.	
EDCLP/225	5.7 Our Sustainability Appraisal highlights the collective effect of	Landscape, ecology, and biodiversity are important issues for the
John Clarkson Leicestershire & Rutland Wildlife	sites west of Shepshed, which means there is potential for significant adverse effects on biodiversity. It is therefore considered essential to set a biodiversity strategy that seeks to improve	Council, and have been integral to the assessments carried out in the SHELAA and the SA.
Trust	connectivity between habitats and secure strategic improvements.	The evidence in this response will be an input into the further landscape
	Provision of a buffer between the developable parts of the sites and the river corridor is important, as is the need to provide areas for	and ecology work that is being carried out to inform the next stage of the draft local plan.
	recreation that take pressure off existing woodland areas. Please involve LRWT in the biodiversity strategy. We are concerned that this goes against the recommendations of the NPPF to 'safeguard components of local wildlife-rich habitats and	The suggested wording to revise Draft Policy LP3 is noted. The instruction and advice is welcomed.
	wider ecological networks' as it appears that sites important for biodiversity are to be lost.	Similarly, the suggested wording to revise draft allocations HS39, Hs41, HS42, HS44, and HS48 is noted. The instruction and advice is welcomed.
	Policy LP3	
	are carefully planned to avoid and then mitigate significant adverse effects on the environment including biodiversity, heritage, the separate character of settlements and landscape, especially for those sites within or adjacent to the Charnwood Forest Regional Park;	The Council would welcome the opportunity to engage with the L&R WT to ensure that the issues raised are addressed in the next draft of the local plan.
	We would rephrase this to be in line with the NPPF and	
	Government's 25 year Environment Plan (A Green Future: Our 25	
	Year Plan to Improve the Environment) - a summary of policy 1 in	
	Government's 25 year Environment Plan is '1. Embedding an	
	'environmental net gain' principle for development, including housing and infrastructure'. Paragraph 174 of the NPPF states 'To	
	protect and enhance biodiversity and geodiversity, plans should a)	
	Identify, map and safeguard components of local wildlife-rich	
	habitats and wider ecological networks, including the hierarchy of	
	international, national and locally designated sites of importance for	

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	biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'	
	We would also include the Charnwood Forest Living Landscape in this point as it is an active landscape-scale project being carried out by LRWT in an are chosen for its high value for wildlife.	
	We would suggest the following: are carefully planned to avoid and then mitigate any adverse effects on the environment including biodiversity (where a net gain should be achieved), ecological networks, priority species and habitats, heritage, the separate character of settlements and landscape, especially for those sites within or adjacent to the Charnwood Forest Regional Park and the Charnwood Forest Living Landscape; in the case of sites in close proximity to the Black Brook west of Shepshed (sites HS39, HS41, HS42, HS44 and HS48), are accompanied by a jointly produced biodiversity strategy to collectively mitigate the potential significant adverse effects of the development of these sites on biodiversity interests; We would change this to be in line with the NPPF and 25 year plan	
	Suggested wording: in the case of sites in close proximity to the Black Brook west of Shepshed (sites HS39, HS41, HS42, HS44 and HS48), are accompanied by a jointly produced biodiversity strategy and commitment to carry it out to collectively mitigate any adverse effects of the development of these sites on biodiversity interests. The strategy should aim to conserve any priority habitats and species, establish ecological networks and ultimately result in a net gain in biodiversity.	
EDCLP/226 Eleanor Hood	Could you target houses which appear to have lain empty for many years? eg 34, 36 and 191 Forest road and the house on the corner of Park road and Mayfield Drive.	The Council agrees that bringing empty homes back in to use should feature as part of the overall housing strategy for the area.
	242	The amount of empty homes in the borough is small in comparison to the overall dwelling stock. The number of empty homes has remained relatively static; and, in fact, the number of "long term" empty homes has

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CONSULTEE EDCLP/246 Andrew Collis Gladman Developments Ltd	REPRESENTATION SUMMARY Draft Policy LP3 relates to the proposed sites for allocation for housing through the Local Plan and sets out (alongside later policies in the Local Plan) the requirements for development proposals to develop these sites. The Policy renews the allocation of several sites included within the adopted Core Strategy and allocates new sites in response to the overall supply requirements of the Plan as set out in Draft Policy LP1. In broad terms, it is considered that the identified supply provides for a good range of sites which are distributed across the Borough. The Council's approach avoids the overconcentration of development meaning that pressure on existing services and infrastructure is likely to be limited and provides for added market choice, enhancing delivery rates. It will also ensure that housing needs and pressures in the market are met enhancing the effectiveness of the Local Plan in addressing key issues for the plan area. The allocation of non-strategic scaled sites means that the uplift in housing land supply required to meet the housing requirement is likely to be achievable in the short term. This is because strategic sites typically take longer to commence development owing to more complex legal and infrastructure requirements meaning that they are more likely to come forward in the medium term. In line with comments submitted in response to Question 3b, Gladman consider that there is need for the Council to identify further allocations through its Local Plan in order to secure full delivery of the proposed housing requirement. As a first stage of this, the Council should review what opportunity there is within urban areas and at proposed allocations for increased housing delivery. This may be through increased density in common with national planning policy. Gladman is sup	steadily reduced over time since 2010. Bringing empty homes back into use is a Corporate priority and the local plan will reflect the Council's ambitions. The Council has sought to provide flexibility within the draft local plan by creating a development strategy that plans for approximately 1,300 additional homes over the plan period. This additional flexibility should help cater to any concerns over whether specific sites may end up delivering a greater or fewer number of dwellings per site. The SHLAA has considered the development potential of sites to reach a conclusion on the yield. Should there be significant variation between the figures in the SHLAA, and the figures put forward by the development industry – then the Council would expect robust evidence to be submitted to demonstrate the expect yield.

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	providing for a more succinct Plan.	
	It is however unclear how the Council will treat proposals for more or less than the cited number of homes identified for each site allocated through the Policy. To ensure that the policy is sufficiently flexible, Gladman consider that each identified capacity should be an "approximation", thereby allowing for reasonable divergence where justified by site specific character, conditions, opportunities, constraints and the type of development being delivered.	
	Of the Sites proposed for allocation, Gladman is particularly supportive of Land off Barnards Drive, Sileby (HS64), Land off Melton Road, East Goscote (HS67) and Land north of Melton Road, Barrow upon Soar (HS54) as sites for housing. Gladman is promoting all sites for residential development and can confirm the developability and deliverability of all.	
EDCLP/192 Severn Trent	Please refer to our Sewer Capacity Assessment Level 1 results for full details, but I have summarised the high risk sites from our	The Council notes the comments relating to water supply, waste-water treatment, and sewerage capacity.
Water	assessment below.	
	 RAG: High: Site is likely to require Sewer Capacity improvements to facilitate development. Medium: Site may require Sewer Capacity improvements to facilitate development. Low: Site is unlikely to require Sewer Capacity improvements to facilitate development. 	The Council would welcome further discussion with STW, to address the initial concerns and to work towards joint solutions.
EDCLP/161 Councillors Gill Bolton and Alice Brennan,	We would like to suggest that consideration be given to creating a new conurbation in the East of the Borough rather than in areas that are already saturated with new properties.	The possibility of a new settlement was considered within the SA as part of four different 'high-level' housing growth scenarios / distribution options; and two 'refined' options.
Shelthorpe Ward		The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects
EDCLP Persimmon Homes and Charles Church	We agree with LP3. However, it is noted that there is no housing trajectory. This omission from the Local Plan is inconsistent with the 2019 NPPF. A housing trajectory should be incorporated together with supporting evidence justifying the Council's assumptions on lapse rates, windfall allowances, lead-in times and	Noted – the Council will be preparing a housing trajectory to be included in the next draft of the local plan.

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DCLP-425-470 Environment	delivery rates in the housing trajectory The Environment Agency has reviewed all of the sites put forwarded for housing in Draft Policy LP3. We have given a	The Council notes the concerns / comments against 15 sites across the borough (three employment and 12 residential).
Agency	response for each site and these are provided in the accompanying spreadsheet 'Environment Agency comments proposed Allocation sites". For most of the sites we have no adverse comment to make. However for some sites we do have concerns/comments to make and for ease of reference these sites are highlighted in red.	Most issues appear to be over siting and land take, which will affect the way that each individual site is built out. The Council expects the Development Management process to ensure that the majority of these issues are resolved.
		However, the Council does note the evidence submitted relating to certain sites, which would appear to pose more significant issues with the proposed allocations. The Council would welcome the opportunity to discuss these sites in more detail with the EA.
EDCLP/177 Sue Green House Builders Federation	Draft Policy LP3 – Housing Sites identifies 73 sites for allocation for housing following a process informed by the preferred strategy and sustainability appraisal.	Noted – the Council will be preparing a housing trajectory to be included in the next draft of the local plan.
	The HBF submit no comments on the merits or otherwise of individual strategic / non-strategic sites proposed for allocation. Our responses to this consultation are submitted without prejudice to any comments made by other parties.	
	It is noted that there is no housing trajectory. This omission from the Local Plan is inconsistent with the 2019 NPPF. A housing trajectory should be incorporated together with supporting evidence justifying the Council's assumptions on lapse rates, windfall allowances, lead in times and delivery rates in the housing trajectory. The HBF may wish to make further representations on the Council's housing trajectory and supporting evidence in	
Q8 - LP3 - Housin	representations to later consultations.	
DCLP/8	Again re the planned HS67, this would destroy the green border	The Area of Local Separation (ALS) is reinforced through Draft Local
Mr Corey Taylor	between the villages of East Goscote and Rearsby.	Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
DCLP/256 Vale Planning Consultants	I believe that each Site should be assessed on an individual basis, to ensure that each proposed development maximises the development potential of the landholding, whilst delivering appropriate landscaping and green infrastructure. The location, extent and type of landscaping and green infrastructure cannot be	Noted – the Council's assessments in the SHLAA outline a number of sites where landscaping and green infrastructure are likely. As such, the policy seeks to establish criteria to ensure that development minimises its impact.

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	easily determined at this early stage, and should be informed by Site specific assessments, which will inform an overarching masterplan approach.	The detailed landscaping and green infrastructure proposals will be expected to be designed and approved through the Development Management process.
DCLP/306 Miss Yvonne Round	Again regarding HS6, this land is currently abundant with wildlife and hedgerows. Building on this land would have a significant impact on the ecosystem and will inevitably result in large losses to local wildlife. Many of which have refuge in the area after being disrupted by other developments of green land. If the proposed development is unavoidable then a large nature reserve of trees and hedgerows (more than a recreational area like with other new estates) will need to be left in order to minimize the negative impact on the environment and local wildlife.	Noted – Draft Policy LP3 sets out (in the ninth bullet point) that the development of the site should be informed by a masterplan, Green Infrastructure Strategy and a Heritage Strategy to mitigate the adverse effects of development.
LDCLP/02 Anonymous	Yes	Noted
LDCLP/22 Anonymous	It is far better to use smaller sites – better still on brown field sites – continued loss of natural wildlife is intolerable "mankind should stop waging war on nature" "The digging & drilling must stop" Quotes from the United Nations	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects
LDCLP/34 Anonymous	Green areas can be mere grass to run around on, or more significant tree/shrub planting to meet environmental considerations.	Noted – the draft local plan contains policies to preserve and enhance both formal and informal green spaces across the borough.
EDCLP/74 Mr Hussain	What significance is being given here to the social housing landlords? Unless they are the <u>significance</u> in any housing consideration then the borough's housing plan entirely fails to support the people of the borough.	Draft Policy LP4 and LP6 provide the policy framework to deliver the right type, tenure, and mix of housing to meet local needs.
EDCLP/80 Historic England	The potential divisions for landscaping and Green Infrastructure were not shown on the individual site maps supplied and could not be considered without more detailed plans due to the size of the Policies Map 1.	Noted – the maps and allocations are shown on the Council's website. The interactive map allows for the strategic landscaping / open space to be viewed. The colour coding is light orange. The link to the interactive map can be found here: <u>https://webmap.charnwood.gov.uk/CharnwoodWebMap/</u>
EDCLP/108 Sue Barry	There needs to be lots more larger green spaces with shrubs / trees in these built up areas of development.	Noted – preserving and enhancing green and blue infrastructure is a priority for the Council.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We agree with the proposal that the Policies Map should show the division between the extent of built form and the areas for landscaping and Green Infrastructure.	Noted – support in welcomed.

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EDCLP/193	Yes	Noted – support in welcomed.
Richard Webb EDCLP/177 Sue Green House Builders Federation	Draft Policy LP3 – Housing Sites identifies 73 sites for allocation for housing following a process informed by the preferred strategy and sustainability appraisal.	Noted – the Council will be preparing a housing trajectory to be included in the next draft of the local plan.
	The HBF submit no comments on the merits or otherwise of individual strategic / non-strategic sites proposed for allocation. Our responses to this consultation are submitted without prejudice to any comments made by other parties.	
	It is noted that there is no housing trajectory. This omission from the Local Plan is inconsistent with the 2019 NPPF. A housing trajectory should be incorporated together with supporting evidence justifying the Council's assumptions on lapse rates, windfall allowances, lead in times and delivery rates in the housing trajectory. The HBF may wish to make further representations on the Council's housing trajectory and supporting evidence in representations to later consultations.	
EDCLP/252 Leicestershire County Council	 Q: For some of the larger sites, we have shown on the Policies Map an indication of the potential division of the site between the extent of the built form and the area for landscaping and green infrastructure. Do you think this potential division should be used to inform development at those locations? The delineation (and associated status) of potential landscaping and green infrastructure areas within allocated sites needs to be sufficiently flexible to ensure that this does not prevent the delivery of essential transport infrastructure required to facilitate these sites. 	Noted – the extent of the strategic landscaping / open space is based on the Council's analysis of sites that have come forward through the Call for Sites process and have been analysed through the SHLAA. That said, the exact land take is still to be determined. This will occur through a combination of development framework documents and site masterplans being prepared for each individual site; and further conversations with promoters/developers through the Development Management process.
EDCLP/244 255 Ian Deverell Turley on behalf	It is not possible to appropriately and robustly consider the spatial proportions of sites until a suitable degree of technical understanding of the site specific constraints and opportunities has been gathered. Only then is it appropriate to commence the	Noted – the extent of the strategic landscaping / open space is based on the Council's analysis of the sites that have come forward through the Call for Sites process and have been analysed through the SHLAA.
of Rainier Developments Ltd (Wymeswold)	preparation of an illustrative masterplan and in turn, identification of the division between built form and open space / green infrastructure.	That said, the exact land take is still to be determined. This will occur through a combination of development framework documents and site masterplans being prepared for each individual site; and further conversations with promoters/developers through the Development Management process.
EDCLP/201 Boyer Planning obo Knightwood	As set out throughout this Statement, Boyer strongly contend that Charnwood should opt for a higher growth strategy in order to maintain a five year housing	The Council acknowledges the submission for "Land at Six Hills, Six Hills".

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Trust Farms	 land supply and deliver development which accords with all three of the sustainability objectives set out in the Revised Framework (2019). This can be achieved by continuing to promote an appropriate level of growth throughout the Borough's settlement hierarchy and by allocating a new settlement. On behalf of Knightwood Trust Farms Limited, Boyer have submitted a Call for Sites Proforma and supporting covering letter in respect of the Strategic Housing and Employment Land Availability Assessment (SHELAA). In summary the submission demonstrates how Land at Six Hills has the potential to deliver a modern, cohesive and sustainable new settlement which will enable the Borough to meet its housing needs. 	The site will be added to the SHELAA and will be considered as part of the site assessments that will inform the next stage of the draft local plan. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The high growth scenario, when analysed through the SA, showcased significant positive effects for housing, as well as positive effects for the local economy and deprivation. But, it also showcased a number of significant negative impacts on landscape character, soil resources, historic environment, and air quality. Considered against the alternative growth scenarios, the high growth option performed less well, and, under comparison, is clearly the option with the fewest positive effects, and the greatest number of negative effects. As such, the Council considers this growth scenario would not deliver sustainable development in the borough. The Council acknowledges the submission of the site "Land at Six Hills". This site will be included in the SHELAA and assessed as part of the next
EDCLP/255 Ian Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	In the preparation of an Illustrative Masterplan for land to the south of East Road, Wymeswold, Rainier instructed a range of technical reports and assessment to feed into the masterplanning process. These included Highways, Drainage, Ecology, Topography, Heritage, Landscape and Arboriculture. The Vision Document enclosed at Appendix 2 provides further detail on this process, ultimately arriving at an illustrative masterplan for the site.	 draft of the local plan. The Council acknowledges the submission of additional information for the site "Land to the South of East Road, Wymeswold". The yield of 81 dwellings is noted. The Council notes the view that the most up-to-date information has not been considered within the SHELAA. The new information received will be used to update the SHELAA (where necessary) and the site will be assessed as part of the next draft of the local plan.
	Rainler Developments are promoting land to the south of East Road and submitted the site to Charnwood Borough Council for consideration as part of the preparation of the new LP. The most recently published SHLAA (2018) was unable to consider the most up to date information prepared by Rainier for the site and so the corresponding assessment for the site Ref. PSH296 does not reflect the most up to date site specific information. Notwithstanding	

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	this, the assessment identified that there are no known irresolvable physical / environment constraints preventing development and recognises (based upon the limited evidence previously received), that the site was deliverable within 6 – 10 years. Rainier are committed to delivering a high quality, sustainable community providing a mixture of new homes set within a significant area of public open space with enhanced pedestrian linkages and wildlife habitats.	
	 Land south of East Road, Wymeswold is truly 'deliverable', meeting the NPPF's definition, and can assist in providing housing land supply early in the plan period. As identified through the Call for Sites submission and the supporting Illustrative Masterplan, the site is suitable for development with limited physical and environmental constraints. Rainier are promoting the site on behalf of the landowners and so the site is available now for development. Given Rainier's substantial experience and resource in bringing high quality housing developments to the market and promotion of sites through the development plan process, the site is achievable, with a realistic prospect of being brought forward for housing following adoption of the LPR. 	
	Rainier will continue to prepare site specific evidence base documents to support the Councils emerging evidence base.	
	These representations are made on behalf of Rainier Developments Limited (Rainier), in response to the Charnwood Local Plan (2019 – 36) Preferred Options Consultation (October 2019). Rainier are promoting land to the south of East Road, Wymeswold, a 5.4 hectare site to the east of Wymeswold which represents a sustainable and deliverable residential opportunity for up to 81 dwellings through a landscape led masterplan. The site has previously been submitted through the Council's call for sites.	
	 These representations are supported by the following documents: Site Location Plan (Appendix 1) [PDF available] Vision Document (Appendix 2) [PDF available] Leicestershire Authorities Statement of Common Ground (2019) (Appendix 3) [PDF available] 	
	These representations have regard to the national and local policy context, and are framed in the context of the requirements of Local	

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	 Plans to be legally compliant and sound. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). For a development plan to be sound it must be: Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. 	
	The site and its surroundings Land to the south of East Road (the site) comprises a single arable field and is bound to the north by a watercourse and woodland plantation belt which borders the A6006 (East Road). The eastern boundary comprises a low-cut hedgerow with trees, whilst the southern and western boundaries sit adjacent to existing residential development and comprise a mixture of boundary treatments with varying degrees of vegetation cover.	
	The site slopes from east to west, with the highest point located on the site's eastern boundary. There is an existing pond located towards the south eastern corner of the site, surrounded by existing vegetation. The site is accessed via an existing track off East Road. There is an informal footpath that runs through the woodland plantation north of the site. This provides convenient access to the more established footways within Wymeswold to the west of the site beyond Manor Court. There are no formal footpaths that cross the site or run immediately adjacent to the site boundaries. There is a footpath north of the A6006 that connects north to the Cross Britain Way (National Trail). Footpath H68/1 to the east of the site affords some glimpsed views across the site towards the centre of Wymeswold.	

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	A range of facilities and services exist within Wymeswold itself and are within walking and cycling distance of the site. These services and facilities include a number of convenience stores, a pharmacy, a number of public houses / restaurants, St Mary's Church of England Primary School, St Mary's Church and allotments.	
	Immediately to the west of the site on East Road are bus stops served by the 8 route. These comprise hourly services (Monday to Saturday) to Loughborough and Melton Mowbray. Further services, including a railway station with high frequency services to Leicester, Nottingham, Sheffield, Lincoln and London, are offered in Loughborough, a larger town 7km to the west of the site.	
	The site is considered in Charnwood's 2018 Strategic Housing Land Availability Assessment (SHLAA) (Site ref: PSH296). The site is identified as 'suitable' with <i>"no known irresolvable physical /</i> <i>environmental constraints preventing development"</i> .	
	The Historic England online register indicates that there are no listed buildings or scheduled ancient monuments within the site. The eastern extent of the Wymeswold Conservation area partially bounds to the site's southern boundary and as such lies within its setting. The Wymeswold Conservation Area Appraisal does not specifically mention the Site, nor is it included within any of the identified key views. Moreover, much of the eastern extent of the conservation area is characterised by predominantly 20th Century housing and lacks the number and quality of more traditional buildings elsewhere within the conservation area. In any event, the setting of the conservation area has been carefully considered in the preparation of the illustrative masterplan for the site with the provision of a landscape buffer along the southern and eastern parts of the site to respect the setting of the Conservation Area whilst ensuring a gradual transition to the countryside beyond.	
	Initial feasibility work indicates that a satisfactory access can be achieved off East Road. Further work is being undertaken to demonstrate this. The site is not constrained by any existing infrastructure such as utilities, pylons or public rights of way. There are existing tree belts and hedgerows within or around the site. The retention and enhancement of these features will be investigated further as part of the preparation of a concept masterplan for the site. Rainier consider that land to south of East Road represents	

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	the most sustainable location for accommodating future housing growth in Wymeswold, and is available now for development.	
	The following section of these representations responds to the consultation document structuring responses to align with the consultation questions. As Rainier have identified in response to Questions 2 and 3a, the substantial unmet housing need arising from Leicester City is a challenge which authorities within the wider HMA must deal with early on within the plan making process.	
	Charnwood's 'low growth' option does not seek to make any contribution towards this unmet need and effectively rolls forward the spatial strategy of the adopted Local Plan. Rainier consider that in order to pass the legal test of the Duty to Cooperate, the new Local Plan must seek to address the unmet housing need arising from Leicester City and in doing so, the plan should identify sustainable, deliverable locations for residential development.	
	Alongside those sites identified within Policy LP3, Charnwood should direct development to locations within the District which are already sustainable and where development will enhance or maintain the vitality of rural communities, providing opportunities for villages to grow and thrive (NPPF para 78).	
	Land to the south of East Road, Wymeswold is well placed to assist in the delivery of up to 81 dwellings in a highly sustainable location within close proximity to existing services and facilities.	
	Summary Rainier welcomes the opportunity to engage with the Charnwood District Council New Local Plan, Preferred Options Consultation (October 2019). This new LP provides the mechanism to identify an appropriate contribution from Charnwood towards Leicester's unmet needs, a need which exists now, as well as the opportunity to review Charnwood's own needs in the context of a new plan period underpinned by the Growth Plan.	
	In meeting its own needs and those of the wider HMA, it will be necessary for Charnwood's most sustainable settlements (including Wymeswold) to accommodate significant growth.	

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EDCLP/254 lan Deverell Turley on behalf	Rainier's site is well suited to meeting this need at Wymeswold and can deliver benefits for new and existing residents without any adverse impacts, as identified within the Vision Document enclosed at Appendix 2 . We trust the information provided within these representations will be considered and we welcome the opportunity to promote Rainier's site at Wymeswold through the New LP. In the preparation of an Illustrative Masterplan for land to the east and west of Iveshead Road, Shepshed, Rainier instructed a range of technical reports and assessment to feed into the	The Council acknowledges the submission of the site "Land to the East and West of Iveshead Road, Shepshed".
of Rainier Developments Ltd)	masterplanning process. These included Highways, Drainage, Ecology, Topography, Heritage, Landscape and Arboriculture.	This site will be included in the SHELAA and assessed as part of the next draft of the local plan.
	The most recently published SHLAA (2018) was unable to consider the most up to date information prepared by Rainier for the site and so the corresponding assessment for the site Ref. PSH296 does not reflect the most up to date site specific information. Notwithstanding this, the assessment identified that there are no known irresolvable physical / environment constraints preventing development and recognises (based upon the limited evidence previously received), that the site was deliverable within 6 – 10 years.	
	Rainier are committed to delivering a high quality, sustainable community providing a mixture of new homes set within a significant area of public open space with enhanced pedestrian linkages and wildlife habitats.	
	 Site is truly 'deliverable', meeting the NPPF's definition, and can assist in providing housing land supply early in the plan period. As identified through the Call for Sites submission and the supporting Illustrative Masterplan, the site is suitable for development with limited physical and environmental constraints. Rainier are promoting the site on behalf of the landowners and so the site is available now for development. Given Rainier's substantial experience and resource in bringing high quality housing developments to the market and promotion of sites through the development plan process, the site is achievable, with a realistic prospect of being brought forward for housing following adoption of the LPR. 	

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	Rainier will continue to prepare site specific evidence base documents to support the Councils emerging evidence base. Introduction These representations are made on behalf of Rainier Developments Limited (Rainier), in response to the Charnwood Local Plan (2019 – 36) Preferred Options Consultation (October 2019). Rainier are promoting land to the east and west of Iveshead Road, Shepshed, representing 2.4 ha and 4.5 ha respectfully (6.5ha combined). Together, these sites represent a sustainable and deliverable residential opportunity for up to 133 dwellings through a landscape led masterplan. The site has previously been submitted through the Council's call for sites. These representations are supported by the following documents: • Site Location Plan (Appendix 1) [PDF available] • Leicestershire Authorities Statement of Common Ground (2019) (Appendix 3) [PDF available] These representations have regard to the national and local policy context, and are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). For a development plan to be sound it must be: • Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; • Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and • Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.	
	The site and its surroundings Given that Rainier's land is located to the east and west of	

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	Iveshead Road Shepshed (the sites), the two sites have their own individual character and surrounding influences. Iveshead Road brings connectivity between to two sites and forms their eastern and western boundaries respectfully.	
	Land to the west of Iveshead Road comprises a single arable field and is bound to the north by newly built residential development. Its western boundary abuts Brick Kiln Lane, with a single residential property beyond that. The sites southern boundary is formed of a hedgerow interspersed with trees, beyond which is agricultural land.	
	Land to the east of Iveshead Road comprises two rectangular arable fields bound to the north by Iveshead Lane, beyond in part lies existing residential dwellings along Iveshead Road, and in part agricultural fields. Beyond the eastern and southern boundaries lies further agricultural land together with a cluster of agricultural buildings which take their access from Iveshead Road.	
	The sites generally slope from south to north, with the highest point located on the site's southern boundary. There are no formal footpaths that cross the site or run immediately adjacent to the site boundaries. The falling gradient of the site together with the apparent urbanising edge of Shepshed creates a sense of enclosed farmland.	
	The nearest bus stops to the site are located on Ashby Road (A512) to the north served by the 16, 16a, 126 and 'Skylink' routes. These comprise regular services (Monday to Saturday) to Nottingham, Loughborough, Leicester, East Midlands Airport and Coalville. Further services, including a railway station with high frequency services to Leicester, Nottingham, Sheffield, Lincoln and London, are offered in Loughborough, a larger town 7km to the east of the site.	
	The Historic England online register indicates that there are no listed buildings or scheduled ancient monuments within the site. The nearest listed building is the Grade 2 listed Fenney Windmill located 1km to the west of the sites.	
	Initial feasibility work indicates that a satisfactory access can be achieved off Iveshead Road into both sites. Further work is being	

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	undertaken to demonstrate this. The site is not constrained by any existing infrastructure such as utilities, pylons or public rights of way. There are existing tree belts and hedgerows within and around the perimeter of the site. The retention and enhancement of these features will be investigated further as part of the preparation of a concept masterplan for the site.	
	Rainier consider that land to east and west of Iveshead Road represents a highly sustainable location for accommodating future housing growth in Shepshed, and is available now for development. The following section of these representations responds to the consultation document structuring responses to align with the consultation questions.	
	As Rainier have identified in response to Questions 2 and 3a, the substantial unmet housing need arising from Leicester City is a challenge which authorities within the wider HMA must deal with early on within the plan making process.	
	Charnwood's 'low growth' option does not seek to make any contribution towards this unmet need and effectively rolls forward the spatial strategy of the adopted Local Plan. Rainier consider that in order to pass the legal test of the Duty to Cooperate, the new Local Plan must seek to address the unmet housing need arising from Leicester City and in doing so, the plan should identify sustainable, deliverable locations for residential development.	
	Alongside those sites identified within Policy LP3, Charnwood should direct development to locations within the District which are already sustainable and where development will enhance or maintain the vitality of rural communities, providing opportunities for villages to grow and thrive (NPPF para 78). Land to the east and west of Iveshead Road, Shepshed is well placed to assist in the delivery of up to 133 dwellings in a highly sustainable location within close proximity to existing services and facilities.	
	Summary Rainier welcomes the opportunity to engage with the Charnwood District Council New Local Plan, Preferred Options Consultation (October 2019). This new LP provides the mechanism to identify an appropriate contribution from Charnwood towards Leicester's	

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	unmet needs, a need which exists now, as well as the opportunity to review Charnwood's own needs in the context of a new plan period underpinned by the Growth Plan.	
	In meeting its own needs and those of the wider HMA, it will be necessary for Charnwood's most sustainable settlements (including Shepshed) to accommodate significant growth. Rainier's site is well suited to meeting this need at Shepshed and can deliver benefits for new and existing residents without any adverse impacts, as identified on the illustrative masterplan enclosed at Appendix 2 .	
	We trust the information provided within these representations will be considered and we welcome the opportunity to promote Rainier's site at Shepshed through the New LP.	
EDCLP/209 Amy Smith Pegasus obo Jelsons	The land at Riggets Green represents a suitable and sustainable development opportunity that should be included in Draft Policy LP 3 as an allocation to provide up to 1,500 homes.	The Council acknowledges the submission of further information for the site "Land at Riggets Green". This site is included in the SHELAA (Reference: PSH123) and has been assessed. This additional information will be used to inform further site assessment work, and inform the next draft of the local plan.
	Draft Policy LP 3 proposes the allocation of some 73 housing sites across the settlement hierarchy, with some 21 sites proposed for allocation at Loughborough and 12 sites in the adjoining urban area of Shepshed.	
	The Sustainability Appraisal Second Interim Report by AECOM, October 2019 sets out the reason why the Council's preferred spatial strategy has been selected and includes site appraisals in Tables 6.2 to 6.18. Jelson Limited has interests in land to the east of Loughborough (Riggets Green), site reference PSH123.	
	The east Loughborough site is included in Council Options 4 and 7, providing 1,000 and 1,500 homes respectively. The Council's decision not to propose the site for allocation in the plan is not supported and is not justified by the available evidence and a proper comparative assessment of the sustainability of reasonable alternatives.	
	Through the stages of preparation of the Draft Local Plan, Jelson Limited has sought to work with officers and members to make sure that they are fully aware of the proposals for development at	

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Riggets Green and the sustainable credentials of the site. This has included the preparation of a Promotional Document and the distribution of a series of Newsletters dealing with particular aspects of the proposals. For completeness the Promotional Document and Newsletters are included as part of these submissions. We are therefore disappointed that the appraisal of the site as outlined in the Sustainability Appraisal does not appear to demonstrate a clear understanding by officers of the Riggets Green Proposals.	
We have already outlined overall concerns about the Council's preferred 'low-growth' option, the overly ambitious assumptions on delivery from the carried forward SUEs, and deliverability of a number of sites selection by the Council for allocation.	
In terms of the development opportunity at Riggets Green, we set out below our concerns about the assessment of the site set out on the Sustainability Appraisal, and also comment on the relative sustainability of sites the Council has selected for allocation in the Loughborough and Shepshed area. Table 6.6 – Housing Site Options Assessment (page 48): Table 6.6 provides a summary assessment of potential sites in the Wolds villages, including Riggets Green. The summary notes that no sites are allocated as 'broadly speaking accessibility is very poor in these settlements.' There is also reference at page 207 to the site being detached from urban centres where access to jobs at Loughborough would probably be by car.	
These statements ignore the evidence submitted on behalf of Jelson Limited that demonstrates that the Riggets Green site is well located in relation to Loughborough and in particular, the town centre, railway station and employment opportunities in eastern Loughborough. It also adjoins the Defence Medical Rehabilitation Centre at Stanford Hall – an important new employment destination. The proposals would provide improved regular bus services through the site connecting to Loughborough. GoTravel Solutions has also investigated the potential for demand responsive transport solutions in association with the development and this is a potential option that is being investigated further. As part of the proposals, new safe off-road cycle links would be provided connecting the Riggets Green site to Loughborough. The proposals	
	Riggets Green and the sustainable credentials of the site. This has included the preparation of a Promotional Document and the distribution of a series of Newsletters dealing with particular aspects of the proposals. For completeness the Promotional Document and Newsletters are included as part of these submissions. We are therefore disappointed that the appraisal of the site as outlined in the Sustainability Appraisal does not appear to demonstrate a clear understanding by officers of the Riggets Green Proposals. We have already outlined overall concerns about the Council's preferred 'low-growth' option, the overly ambitious assumptions on delivery from the carried forward SUEs, and deliverability of a number of sites selection by the Council for allocation. In terms of the development opportunity at Riggets Green, we set out below our concerns about the assessment of the site set out on the Sustainability Appraisal, and also comment on the relative sustainability of sites the Council has selected for allocation in the Loughborough and Shepshed area. Table 6.6 – Housing Site Options Assessment (page 48): Table 6.6 – provides a summary assessment of potential sites in the Wolds villages, including Riggets Green. The summary notes that no sites are allocated as 'broadly speaking accessibility is very poor in these settlements.' There is also reference at page 207 to the site being detached from urban centres where access to jobs at Loughborough would probably be by car. These statements ignore the evidence submitted on behalf of Jelson Limited that demonstrates that the Riggets Green site is well located in relation to Loughborough and in particular, the town centre, railway station and employment opportunities in eastern Loughborough. It also adjoins the Defence Medical Rehabilitation Centre at Stanford Hall – an important new employment destination. The proposals would provide improved regular bus services through the site connecting to Loughborough. GoTravel Solutions has also investigated the potential for d

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	recreational facilities and employment land to provide a sustainable development solution catering for the day to day needs of future residents. The assessment appears to have ignored these clear sustainability credentials.	
	Landscape Impacts (page 234): The Sustainability Appraisal identifies potential uncertain significant negative landscape effects associated with a proposal for a new settlement east of Loughborough. This conclusion is inconsistent with the earlier assessment at page 157 of the report which concluded that as large areas of open space would remain, likely landscape effects would not be likely to be significant. Pegasus Landscape prepared a response to the LUC Landscape Sensitivity Report and this is included as part of these representations.	
	The development proposals for Riggets Green and the indicative masterplan proposals included in the Promotional Document have been landscape-led, with the extent of the proposals and associated landscape strategy informed by a detailed Landscape and Visual Assessment. The masterplan proposals limit the development envelope to avoid the higher areas of land more sensitive in landscape terms. Extensive areas of informal open space are proposed as part of the proposals and, along with new areas of buffer planting, this will help to mitigate any wider landscape impacts of the proposal. The proposals would not therefore result in significant negative landscape impacts. Heritage Impacts (page 265):	
	The Sustainability Appraisal refers to a potential significant negative effect on heritage interests associated with proposals for development east of Loughborough, referring to a response from Historic England to a previous application submitted in 2013 (ref P/13/1842/2) identifying potential substantial harm the to the Cotes Medieval Village Scheduled Ancient Monument. Again, this is inconsistent with the assessment at page 187 that notes more limited potential impacts.	
	The Courts have held that substantial harm is a high bar and that it will involve partial or full loss of the asset. The proposals for development at Riggets Green would not lead to the loss of the asset and there is no impact on the setting of the Scheduled	

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	Monument. It is therefore not accepted that there is any material harm associated with the proposed development at Riggets Green.	
	Existing and proposed planting between the Scheduled Monument and the site will serve to limit impacts on the setting of the Medieval Village. The proposals also provide for the interpretation of the history of the site to enable existing and future residents to gain a better understanding of the local heritage.	
	Impacts on Cotes Grassland SSSI (page 238): At page 238 it is suggested that the Riggets Green site is adjacent to the Cotes Grassland SSSI and that there would potentially be minor negative effects as a result. The proposed development is to the north-east of the site and would not directly affect it. As the Sustainability Appraisal notes, the development would allow for substantial areas of green infrastructure which would draw people away from more sensitive areas and that effects would be neutral once green infrastructure is established as part of the development proposals.	
	Deliverability (page 273 and 295): The Sustainability Appraisal at page 273 comments that the delivery of growth at Riggets Green may be affected by reliance on infrastructure to support the level of growth leading to slight uncertainties about deliverability within the plan period. Page 295 of the Sustainability Appraisal notes some uncertainty over whether new facilities would be secured as part of the development.	
	There is no evidence to support this assertion. The proposed development does not require significant new infrastructure provision in terms of new highway infrastructure. The proposals for Riggets Green include the provision of supporting services and facilities to meet day to day needs including a new primary school, local centre, areas for recreation and employment uses. The scale of development proposed at 1,500 homes will support the provision of these facilities.	
	It is likely that Jelson Limited and Davidsons Developments would be involved in bringing the Riggets Green development forward. Both companies have a strong track record in delivering large new developments across Leicestershire. For their development north of Birstall, Jelsons were directly involved in delivering new	

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	employment units alongside the housing development. The proposed development at Riggets Green has the committed involvement of two large local housebuilders who will look to drive forward the development if it is included as an allocation on the plan.	
	Relative Sustainability of Proposed Allocations around Loughborough and Shepshed Draft Policy LP 3 includes a number of proposed greenfield allocations at Shepshed and to the south and south-west of Loughborough. We have already questioned the justification for allocating a further 2,000 homes at Shepshed. Proposed allocations at Shepshed should be considered in the context of the Loughborough Urban Centre and the extent to which they represent the most sustainable options. Sites to the west and north-west of Shepshed are some distance from the main services and facilities available in Loughborough Town Centre, the employment opportunities to the east of the town and the rail station.	
	Using the Leicestershire County Council Choose How you Move Journey Planner, this shows that for sites to the west of Shepshed, it is a 34 minute cycle ride to Baxter Gate in Loughborough Town Centre, and a 45 minute bus ride using Service 127. For land at Cotes, by comparison it is a 10-minute cycle ride and a 7-12 minute bus journey using Service 8 or 9. From Cotes it is a 7 minute cycle ride to Loughborough Train Station and around a 12 minute bus journey. For west Shepshed to the station it would be a 37-minute cycle ride and a 1 hour bus journey. In terms of car journey times, for Cotes it would be a 3-minute car journey to the rail station and 5 minutes to Beehive Lane car park, compared with 14 minutes and 13 minutes from west of Shepshed.	
	The Council needs to properly consider the relative sustainability credentials of potential sites for allocation around the Loughborough Urban Area, and cycle and bus journey times to key services and facilities should be an important consideration in this assessment.	
	In terms of landscape sensitivity, land proposed for allocation to the south-west of Loughborough falls within an area of medium-high landscape sensitivity to development. As for the land east of	

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	Loughborough, we have set out above how the masterplan proposals have been landscape led and will help to mitigate any wider landscape impact. On the Council's assessment, the land east of Loughborough is no worse terms of landscape impacts than the land the Council proposes for allocation to the south-west of Louhborough. We have included with these representations an assessment by Pegasus Landscape which questions the conclusions of LUC in relation to landscape impacts.	
	The land at Riggets Green represents a suitable and sustainable development opportunity that should be included in Draft Policy LP 3 as an allocation to provide up to 1,500 homes. It is no more harmful than any of the greenfield sites selected for allocation around Loughborough and Shepshed and, in many respects offers a better solution, particularly in relation to travel distances to key services and the ability to provide a comprehensive development solution including new services and facilities and new employment opportunities.	
EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Field Head)	Land south of Markfield Lane, Field Head represents a sustainable development opportunity that should be included as an allocation in Policy LP 3. A completed SHLAA form has been submitted along with this representation.	The Council acknowledges the submission of the site "Land South of Markfield Lane, Field Head". This site will be included in the SHELAA and assessed as part of the next draft of the local plan.
	Draft Policy LP 3 proposes to allocate a total of 73 sites across the Borough to meet the identified housing requirement over the plan period to 2036. The Draft Policy proposes the allocation of 13 sites for housing development in settlements well related to the Leicester Urban Area. The Council should also have considered the opportunity for allocations on land in Charnwood adjacent to settlements in adjoining districts that are also well related to Leicester. The Hinckley and Bosworth Core Strategy identifies Markfield and Field Head as a Key Rural Centre relating to Leicester. Davidsons Developments Limited has interests in land to the south of Markfield Lane, Field Head [PDF available] which has the potential to provide some 50 homes in a sustainable location well related to the existing settlement form. The site is well screened by	The development capacity for the site (50 dwellings) is noted.
	existing development and would therefore not impact on the wider landscape. It is well related to the range of services and facilities at	

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	Markfield including good quality public transport connections to Leicester. With the 40 mph speed limit along the Leicester Road and available pedestrian crossing facilities, there is easy access for pedestrians and cyclists from the site to the facilities at Markfield.	
	The site should be allocated under Policy LP 3 for the development of some 50 dwellings as part of the proposed allocations well related to the Leicester Urban Area.	
EDCLP/148	Draft Policy LP3 Housing Sites	The Council acknowledges the submission of the site "34 Brick Kiln Lane,
Thomas Taylor	An additional small-scale housing allocation should be made at land adjoining 34 Brick Kiln Lane as identified on the attached Plan	Shepshed".
Planning Ltd obo Mr W Sbitany	S48.2 (see extract at Figure 2 below).	This site will be included in the SHELAA and assessed as part of the next draft of the local plan.
	The proposed housing allocation site comprises a strip of land on the western edge of the settlement which is part previously developed land and part green-field (a small paddock). The overall site amounts to approximately 0.63Ha (gross) although the net developable area is less at 0.56Ha (approx.) reflecting the land occupied by the existing house and a pond located at the southern end of the site. Development of this site with 5 dwellings would help to contribute towards the draft Plan's aspiration of delivering 10% of new homes on sites of 1.0Ha or less and provides potential for self- build housing.	The development capacity of the site (5 dwellings) is noted.
	The site lies in a sustainable location on the edge of Shepshed which is at the second-tier of the Council's Settlement Hierarchy in the draft Local Plan. Shepshed contains a range and choice of services and facilities that meet the day to day needs of residents and physically or functionally forms part of a wider Loughborough Urban Area. Development of this site would therefore be in a sustainable location and in accordance with the proposed Development Strategy. The site is enclosed by strong, defensible boundaries including existing housing to the north, south and east with mature hedges and trees along the site's western boundary where it adjoins the countryside to the west. Subject to detailed layout and design, development of this site would be readily assimilated into the landscape. A small-scale housing development on the site would represent a rounding off on this edge of the settlement without causing any harm to the character or appearance of the area.	
EDCLP/204 Guy	Draft Policy LP 3, proposes to allocate a total of 73 sites across the	The Council acknowledges the submission of additional information for
Longley Pegasu	Borough to meet the identified housing requirement over the plan	the site "Land off Brookfield Road, Rothley".

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s obo Davidsons Development Ltd (Rothley)	 period to 2036. The Draft Plan is supported by a Sustainability Appraisal Report (SA) by AECOM, October 2019. This outlines the reasons why the Council's preferred spatial strategy has been selected. Summaries of individual site appraisals are included in Tables 6.2-6.18. For Rothley, site appraisals are included at Table 6.12. The table refers to the two sites proposed for allocation at Rothley (PSH53 Land South of Rothley and PSH128 Land at Woodcock Farm). Davidsons Developments has interests in land off Brookfield Road (PSH400) and has promoted the site for development through earlier stages of the preparation of the Draft Local Plan. As part of these submissions we have included a Vision Document setting out the potential for development on the site and the opportunity to provide for an extension to Rothley C of E Primary School as part of the development proposals. The Council has failed to properly consider the potential for development on the site, and in particular the opportunity to support a required extension to Rothley C of E Primary School. The site should be included as a proposed allocation under Draft Policy LP 3. The reasons for not allocating the land at Brookfield Road are not clearly set out, although paragraph 7.2.29 of the SA refers to the avoidance of the Area of Local Separation. It is important that the selection of sites for allocation takes a balanced view of development opportunities. For the land south of Brookfield Road any potential impacts on the Area of Separation should be balanced against the opportunity to secure an extension to Rothley Primary School as part of the development of the development off Eldberberry Drive. Existing planting to the south of the site and along Lord Macauleys Walk separates the site from the wider Area of Separation to the south. The site is clearly distinct from this wider area and the development would not undermine the principles of Separation in this location. With the implementation of a robust lands	 This information will be used to update the SHELAA (where appropriate), and the site will be assessed as part of the next draft of the local plan. The development capacity of the site (80 dwellings) is noted. The Council acknowledges the concerns raised in relation to: Site HS5 has potential heritage impacts on Park Pale. Land at Brook Street, Syston (HS7) involves land in existing employment use. Small sites proposed at Thurmaston involve existing employment use. Small sites proposed at Thurmaston involve existing employment land and backland sites in multiple ownership where delivery of the sites might be difficult. Land at Frederick Street (HS17) involves a difficult backland site in multiple ownership. Town Centre Opportunity Sites (HS21, HS22) and other town centre sites (HS19, HS20, HS24) are proposed for development. For the Town Centre Opportunity Sites, development has been promoted for some time with little progress being made on release of these sites for development. Sites proposed for development involve existing car parks and sites in retail use where delivery is questionable. The proposed greenfield extension to the south-west of Loughborough would involve development in an area of high landscape sensitivity. Some 2,000 additional homes are proposed at Shepshed. Combined with the scale of development already accommodated in the settlement, the sustainability of this scale of additional development is questionable. Proposed allocation sites at Rothley are potentially constrained by noise issues and impacts on a listed building. The sites proposed would exacerbate the existing capacity problems at Rothley Primary School with no scope to facilitate the required expansion of the school. For the least sustainable settlements in the hierarchy, the Draft Plan proposes the allocation of some 800 homes. Proposals include the allocation of 223 dwellings at East Goscote, a site recently refused on app

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	consistent with the local settlement pattern and the transition between this and the wider landscape context. The proposed Area of Separation includes land within the existing Primary School grounds. This designation is not appropriate, and the school site should be excluded from the proposed Area of Separation which should also be amended to provide for the allocation of land at Brookfield Road for housing development.	
	As outlined above, the Council has failed to properly consider the needs for expansion of Rothley Primary School in its selection of sites for allocation in Rothley. The proposed allocations south of Rothley and at Woodcock Farm would not facilitate the required expansion of the school as additional land for the school is required that can only be secured through the allocation of land at Brookfield Road for development, including provision for the expansion of the school. These sites are also potentially subject to noise constraints associated with the A6 bypass. The SA also notes that the land at Woodcock Farm would impact on the setting of a listed building. The southern part of the Woodcock Farm site would extend development further to the south than the existing limit of built development, directly impacting on the Area of Separation at its most sensitive point.	
	Accompanying these representations, a report by ADC Infrastructure has been included, summarising the work undertaken on highways, flood risk and drainage to support the development proposals.	
	We have commented separately on the need for the plan to provide greater flexibility to deal with changing circumstances and to take a more realistic view on delivery from the carried forward SUEs. In terms of the proposed allocations as set out in Draft Policy LP 3, there are concerns about the suitability and deliverability of a number of the proposed allocations, which demonstrates the need for the Council to review its proposed allocations. We would make the following comments on the proposed allocations as set out in the Draft Policy.	
	Leicester Urban Area: For the proposed allocations adjoining the Leicester urban area, site HS5 has potential heritage impacts on Park Pale. Land at Brook Street, Syston (HS7) involves land in existing employment	

use. Small sites proposed at Thurmaston involve existing employment land and backland sites in multiple ownership where delivery of the sites might be difficult.

Loughborough Urban Centre:

For the Loughborough urban area there are a large number of proposed allocations on urban sites where their suitability and deliverability is questionable. Land at Frederick Street (HS17) involves a difficult backland site in multiple ownership. Town Centre Opportunity Sites (HS21, HS22) and other town centre sites (HS19, HS20, HS24) are proposed for development. For the Town Centre Opportunity Sites, development has been promoted for some time with little progress being made on release of these sites for development. Sites proposed for development involve existing car parks and sites in retail use where delivery is questionable. The proposed greenfield extension to the south-west of Loughborough would involve development in an area of high landscape sensitivity.

Shepshed Urban Area:

Some 2,000 additional homes are proposed at Shepshed. Combined with the scale of development already accommodated in the settlement, the sustainability of this scale of additional development is questionable.

Service Centres:

As noted above, proposed allocation sites at Rothley are potentially constrained by noise issues and impacts on a listed building. The sites proposed would exacerbate the existing capacity problems at Rothley Primary School with no scope to facilitate the required expansion of the school.

Other Settlements:

For the least sustainable settlements in the hierarchy, the Draft Plan proposes the allocation of some 800 homes. Proposals include the allocation of 223 dwellings at East Goscote, a site recently refused on appeal.

The Council needs to review its proposed allocations to ensure that sites proposed for allocation are suitable and deliverable.

For the land at Brookfield Road, there is the opportunity to allocate land to provide some 80 new dwellings alongside the provision for

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	the expansion of Rothley C of E Primary School. The Vision Document accompanying these submissions shows how development on the site could come forward without impacting on the wider Area of Local Separation to the south and avoiding unacceptable landscape impacts. The site is well related to the existing built form and close to the wide range of services and facilities available in Rothley. Draft Policy LP 3 should be amended to include the allocation of land at Brookfield Road to provide 80 dwellings and an expansion of Rothley C of E School. The land at Brookfield Road, Rothley represents a sustainable development opportunity that can help to secure the necessary expansion to Rothley C of E Primary School and should be allocated for development in Policy LP 3.	
Developments Ltd	Draft Policy LP 3 proposes to allocate a total of 73 sites across the Borough to meet the identified housing requirement over the plan period to 2036. The Draft Plan is supported by a Sustainability Appraisal Report (SA) by AECOM, October 2019. This outlines the reasons why the Council's preferred spatial strategy has been selected. Summaries of individual site appraisals are included in Tables 6.2-6.18. For Queniborough, site appraisals are included at Table 6.9. The site at Barkby Road is not appraised as it is a committed development. The additional opportunity to the south-east of the site has been submitted to the current Call for Sites. The additional land available off Barkby Road represents a suitable and sustainable development opportunity that should be included as an allocation in Draft Policy LP 3 to provide an additional 50 dwellings. The site represents a logical extension to the existing Barley Fields development. Sitting to the rear of this new residential area and to the east of the Syston Rugby Club grounds, development would not impact on the wider landscape. With the floodlighting and associated buildings, the Rugby Club represents an urban fringe use. The additional site sits to the rear of the Rugby Club and is bounded by existing development to the north and east. Its easternmost boundary abuts the Queniborough Conservation Area. However, through sensitive masterplanning,	The Council acknowledges the submission of "Land South of Boomtown Meadow, Queniborough". This site will be included in the SHELAA and assessed as part of the next draft of the local plan. The development capacity of the site (50 dwellings) is noted.
	any potential impacts on the Conservation Area could be minimised.	

We have commented separately on the need for the plan to provide greater flexibility to deal with changing circumstances and to take a more realistic view on delivery from the carried forward SUEs. In terms of the proposed allocations as set out in Draft Policy LP 3, there are concerns about the suitability and deliverability of a number of the proposed allocations, which demonstrates the need for the Council to review its proposed allocations. We would make the following comments on the proposed allocations as set out in the Draft Policy. For the land at off Barkby Road, Queniborough, there is the opportunity to allocate land to provide some 50 new dwellings, to include much needed affordable housing. The development that		NSE NO/ SULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
not impinge on identified Areas of Local Separation. Policy LP 3 should be amended to include the site as an additional allocation.Land at Barkby Road, Queniborough, represents a sustainable development opportunity that is in keeping with the form and character of the settlement. The site should be allocated for development in Policy LP 3. A completed SHLAA form has been submitted along with this representation.DCLP 265 Silver Fox obo Ms J & Ms A KimberThe following representations are made on behalf of Jeanette and Averil Kimber ('the Kimber's') of The Farm Barn, Hillcrest Orchard Farm, Cotes Road, Barrow-upon-Soar which seek the allocation ofThe Council acknowledges the submission of the site "Land to the Ne of Willow Road, Barrow-upon-Soar".	DCLP 26 Fox obo	65 Silver Ms J &	 greater flexibility to deal with changing circumstances and to take a more realistic view on delivery from the carried forward SUEs. In terms of the proposed allocations as set out in Draft Policy LP 3, there are concerns about the suitability and deliverability of a number of the proposed allocations, which demonstrates the need for the Council to review its proposed allocations. We would make the following comments on the proposed allocations as set out in the Draft Policy. For the land at off Barkby Road, Queniborough, there is the opportunity to allocate land to provide some 50 new dwellings, to include much needed affordable housing. The development would involve a logical extension to a successful new development that would not result in any unacceptable landscape impacts and would not impinge on identified Areas of Local Separation. Policy LP 3 should be amended to include the site as an additional allocation. Land at Barkby Road, Queniborough, represents a sustainable development opportunity that is in keeping with the form and character of the settlement. The site should be allocated for development in Policy LP 3. A completed SHLAA form has been submitted along with this representation. The following representations are made on behalf of Jeanette and Averil Kimber ('the Kimber's') of The Farm Barn, Hillcrest Orchard Farm, Cotes Road, Barrow-upon-Soar which seek the allocation of circa 185 dwellings on land to the north of Willow Road, Barrow-upon-Soar which is located to the east and south of Willow Way, was developed by Miller Holes and David Wilson Homes during the early 2000's for housing, with David Wilson Homes constructing Willow Way by way of adoptable highway and associated 	This site will be included in the SHELAA and assessed as part of the next draft of the local plan.

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	1.3 The Site extends to approximately 9.69 hectares (gross)/6.06ha (net), which is currently grassland used principally for horse grazing. The site is sustainably located in relation to the range of services in Barrow-upon-Soar, including shops, medical facilities and local schools. It is also well placed in relation to accessibility by road and train to higher order centres in Leicester, Loughborough and Nottingham.	
	1.4 Barrow-upon-Soar is proposed in the Charnwood Local Plan 2019-2036, as one of six Service Centres within the Settlement Hierarchy, which have 'a range and choice of services and facilities that meet he day to day needs of residents and physically and functionally forms part of the wider Leicester or Loughborough Urban Area'. This proposal is therefore consistent with the preferred development strategy of the emerging Local Plan which, inter alia, seek to focus smaller scale housing growth to service centres, with 932 new homes being proposed in the emerging Local Plan in these centres (along with 1,559 extant planning permissions and allocations). Indeed Barrow-upon-Soar is considered an appropriate and sustainable location to consider allocating 268 dwellings in the emerging Local Plan. We reserve our right in due course to make further representations regarding those proposed allocations (HS52 to HS56).	
	1.5 As indicated above (i) the Site is afforded unrestricted highway access from Willow Way and (ii) it is under one family ownership making it readily available, achievable and deliverable to commence contributing towards the housing needs of the Borough an early stage following allocation.	
	Land to the North of Willow Way Barrow-upon-Soar – Charnwood Local Plan 2019-2036: Representatuion to Consultation Client: Jeanette and Averil Kimber	
	1.6 This representation has been informed by initial highway and drainage, Master planning and landscape advice provided by ADC Infrastructure (David Cummins), Pegasus Urban Design (Paul Smith) and LDA Design (Charles Crawford), respectively.	
	1.7 The illustrative development layout of the residential	

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	development proposed for the Site is provided with this representation.	
	In general terms, the selection of each site needs to be informed by clear evidence of its availability, suitability and achievability, including a site-specific trajectory for when it will be delivered.	
	2.6.2 As these new sites have not been subject to fine-grain analysis to date by the Council we reserve our position to make further representations about those sites as the Local Plan process emerges.	
	Land to the north of Willow Way Barrow upon Soar	
	3.1 The proposal seeks the allocation of the Site for residential development to the north of Willow Way, Barrow-upon-Soar. The Site could accommodate circa 185 dwellings together with associated highway access, site engineering, drainage, landscape and ecological provision and associated public open spaces.	
	3.2 Initial highway, drainage, Master planning and landscape character/impact assessments have not identified any technical or other constraints to preclude the principle of the site being allocated as proposed in this representation.	
	3.3 The Site comprises a number of pasture fields to the north of Willow Road, Barrow-Upon-Soar, extending to approximately 4hectares in total. The majority of the Site is separated from Willow Road by a belt of semi-mature woodland planting approximately 15m wide. A gap in this planting at the south west corner of the Site provides an access from Willow Road. On the south side of Willow Road lie extensive areas of recent housing development.	
	3.4 Barrow-Upon-Soar lies on the east side of the Soar valley. Willow Road is the highest part of the town at around 65m Above Ordnance Datum (AOD). From this point, the land falls north to a small tributary brook, which flows westwards to the River Soar. The Site lies on the north facing slope of this tributary valley. Beyond the brook, which is at 45-50m AOD, the land rises up to a ridge at an elevation of around 65m AOD north of Foxhill Farm approximately 400m north of the Site. This ridge prevents any	

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	views of the Site from the wider landscape beyond the ridge.	
	3.5 To the north and east of the Site are extensive areas of farmland, predominately pasture, which fill the tributary valley. To the west, a single pasture field separates the Site from Cotes Road, which runs north from Barrow-Upon-Soar to Cotes and Loughborough. The buildings of Hillcrest Orchard Farm lie adjacent to the north west corner of the Site and are accessed from Cotes Road.	
	THE PROPOSED ALLOCATION SITE	
	 Technical Note on Landscape and Visual Matters (LDA Design – Charles Crawford) Site and Context Land to the North of Willow Way Barrow-upon-Soar – Charnwood Local Plan 2019-2036: Representation to Consultation Client: Jeanette and Averil Kimber 3.6 The Site is used for horse grazing. It is enclosed to the south by the belt of semi-mature woodland along Willow Road, and to the east by a substantial hedgerow and adjacent small copses. The field immediately west of the Site has strong boundary hedgerows with a number of hedgerow trees. The fields within the Site are divided partly by fairly sparse hedgerows and partly by post and rail fences, which also bound the northern Site boundary. 3.7 Visually, the Site is well contained. Other than at the access 	
	point, there are no views into the Site from Willow Road. There are no public rights of way allowing views of the Site from the rural landscape within the tributary valley to its north and east, and the ridge north of Foxhill Farm prevents views from the landscape further north. There is a public bridleway along Strandcliffe Lane connecting eastwards from Willow Road to Nottingham Road. This route is well vegetated on its northern side but there may be one or two glimpses towards the eastern side of the Site.	
	3.8 Approaching Barrow-Upon-Soar from the north along Cotes Road, there are occasional glimpsed views of the Site at distances of 500m or less. However, in these glimpsed views, houses on Willow Road, which lies at a high elevation, are visible on the skyline and encroach on the rural character of the view. Any	
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	glimpses of future development within the Site would be seen in this context and would not be perceived as significant further urbanisation of the rural landscape.	
	3.9 The Site may also be visible in distant views from locations near the edge of Loughborough approximately 2.5km to the north- west, although these views have not been studied in detail at this preliminary stage. In any such views, the housing south of Willow Road would also be visible and any development on the Site would be insignificant in this context.	
	3.10 The Site was not promoted through the SHLAA process and consequently was not included in this Assessment. However, the land immediately east of the Site was included in the Assessment as site PSH237. The Assessment found PSH237 to have a Low-Medium sensitivity to development for 2-3 storey residential housing, with no criterion rated higher than Medium. The Site is similar to PSH237 in many respects but could be expected to have a lower sensitivity rating due to its closer relationship to existing development south of Willow Road and its greater distance from Strandcliffe Lane, which runs along the southern boundary of PSH237.	
	Visual Analysis Landscape Sensitivity of SHLAA Sites Land to the North of Willow Way Barrow-upon	
	3.11 The Site lies outside the limits of development identified in the Neighbourhood Plan, which reflect those defined in the Local Plan. The Neighbourhood Plan does not make any specific comment concerning the Site or the wider landscape around it. The woodland belt on the north side of Willow Road, along with areas of open space bounding the housing development on the south side of the road, are identified as Local Green Spaces (GS05) in the Neighbourhood Plan. These spaces lie outside the Site boundary and would not be affected by any development.	
	3.12 This initial assessment has involved deskwork along with a site visit undertaken on 31 October 2019. It finds that the Site is well related to the existing built edge of Barrow-Upon-Soar and has low visibility from the rural landscape, being contained within a small tributary valley within which there are no publicly accessible	

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	viewpoints. In glimpses of the Site from Cotes Road and more distant viewpoints towards Loughborough, housing along Willow Road is visible on the skyline and any development on the Site would add little to the perception of built development in the landscape. There are no landscape features of particular value within the Site that would constrain development.	
	3.13 Based on the assessment of adjacent land in the Landscape Sensitivity Assessment of SHLAA Sites, the Site could be expected to have Low (or at most Low-Medium) sensitivity to development. There are no constraints to development on the Site arising from the Local Plan, apart from the fact that it lies outside the village development limits.	
	3.14 It is concluded that the Site could accommodate appropriately designed residential development without significant landscape or visual effects.	
	3.15 Highway access would be taken from Willow Way, a soon to be adopted highway with no obvious constraint. The highway comprises a 6m wide access road with associated pedestrian pathways. It is proposed that storm water will be attenuated on site within balancing ponds and discharged via attenuation into the watercourse on the northern boundary of the Site. Willow Way acts as a 'northern distributor road for Barrow-upon Soar and is lit up close to the boundary of the site.	
	3.16 The NPPF (para 108, February 2019) says that:	
	Barrow upon Soar Neighbourhood Plan Conclusions on Landscape and Visual Matters Highway access (ADC Infrastructure – David Cummins) Land to the North of Willow Way Barrow-upon-Soar 3.17 The development site is in Barrow, a sustainable location with a mix of facilities and amenities:	
	3.18 Willow Road has been designed to accommodate a bus route, with bus stops designed in to the road layout, although buses do not yet use those stops.	
	3.19 Cotes Road is a bus route, served by Roberts Coaches' number 27 service that routes between Loughborough and	

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	Thurmaston Shopping Centre. Towards Loughborough there is a first bus at 08:17, arriving in Loughborough at 08:33, with services every 1½ hours thereafter. The last bus back from Loughborough leaves at 17:10 arriving in Barrow at 17:24. Kinch service 2 runs every 30 minutes between Loughborough and Leicester through the centre of Barrow. Its eastward route brings it in to the village on Barrow Road, travelling up the High Street and North Street before turning along Babington Road, Melton Road and Sileby Road. The nearest stop to the site for this service is around 1.3km walking distance.	
	 "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; and c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree." 	
	 Humphrey Perkins school is 860m walking distance from the site access junction on Willow Road The Co-op on High Street would be 1.42km walking distance; There are facilities along the High Street such as a dental practice, pharmacy, health centre, Parish Council office, florists, hairdressers, cafes and takeaways There are various other facilities along North Street and throughout the village such as pubs, churches, day nurseries, the petrol filling station, etc. All these facilities are within acceptable walking distance (2km) of the development site. 	
	3.20 Access to the development can be provided on Willow Road, where the site has an existing access. Willow Road is an unclassified road with a 30mph speed limit. It has speed control features along its length.	
	3.21 Willow Road has a good quality footway along its southern side that is part of a continuous network throughout the village. On the northern side of Willow Road, a wide space has been reserved	

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	between the edge of the carriageway and the landscape bunding to allow a footway to be provided in the future. The footway on the northern side of the road can be connected to the footway on the southern side with pedestrian crossings.	
	3.22 An access can be provided with footways both sides of the carriageway that requires no relaxations from the design standards and would have adequate visibility.	
	3.23 A development of circa 200 dwellings will generate around 130 traffic movements in a peak hour. In the morning peak hour that is likely to be around 100 vehicles departing and 30 arriving. That traffic would immediately start dispersing once it reached Willow Road, going northwards along Cotes Road, southwards along Cotes Road, and eastwards towards Nottingham Road and Melton Road.	
	3.24 The impact of the development traffic would need to be examined in detail through a Transport Assessment. Mitigation will be explored where there are adverse impacts. A Travel Plan will be required where there are more than 80 dwellings. The Travel Plan will target reduction in single occupancy vehicle use and enable journeys by sustainable modes of transport offering, amongst other things, free bus passes and travel packs for residents. At this early stage the most sensitive location to traffic increases is likely to be Barrow Bridge, which is signal controlled to allow one-way shuttle running. Taking 100 departures in the morning peak hour, and considering the local population centres and routing, around a third of the departures may route over the bridge, which is 33 traffic movements in a peak hour, or one every two minutes. That is a modest increase in traffic that would not materially alter the queuing and delay at the bridge.	
	3.25 Thus, overall, the development would be deliverable, and accord with the objectives of the NPPF, providing opportunities for sustainable travel, safe access for all road users, and would mitigate its impacts.	
	Concept Master Plan (Pegasus Urban Design – Paul Smith) Land to the North of Willow Way Barrow-upon-Soar	
	3.26 The Concept Masterplan accompanying this representation	

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CONSULILL	demonstrates how circa 185 dwellings could be developed within the Site. The illustrative layout could secure across the site an average density of [[dwellings per hectare, providing a mix of houses that accords with the objectives of draft Policy LP6, in order to enable the Site to cater for a diverse housing market and mix and provide levels of affordability to seek to ensure the types of affordable homes provided best meet the needs of the community and ensure a Registered Provider can be successfully secured to manage the homes.	
	3.27 In design terms the proposed allocation would make a positive contribution to Charnwood through responding to secure through the development local distinctiveness in providing attractive and functional places where people want to live and work. This may be established through design principles (and thus accord with the objectives of draft Policy LP2) to ensure the development:	
	 Will respect and enhance the character of the area, having regard to scale, mass, density, height, landscape, layout, materials within and around area; Protect the amenity of residents in the vicinity of Willow Way; will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; is visually attractive as a result of good architecture, layout and appropriate and effective landscaping; establishes or maintains a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, safe, welcoming and distinctive places to live, work and visit; optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and 	
	 appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and creates places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users46; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. 	
	 Contributed to mitigating and adapting to the effects of climate change in accordance with draft Policy LP30; Provide appropriate opportunities to promote sustainable 	

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	transport modes; and safe and suitable access to the site can be achieved for all users;	
	 Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and – so far as possible – to facilitating access to high quality public transport, with the design of the layout seeking to maximise the catchment area for public transport services, and appropriate facilities that encourage public transport use; Address the needs of people with disabilities and reduced mobility in relation to all modes of transport; Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; Allow for the efficient delivery of goods, and access by service and emergency vehicles; and Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. 3.28 A design guide and/or code could provide a framework for creating a distinctive place on the Site, delivering a consistent and high-quality standard of design but tailored to tallow a suitable degree of variety where this would be justified. 	
	3.29 Development would be proposed to be set back from the Sites southern boundary to retain and open setting to marry with that provided from the development immediately to the south of Willow Way and its associated open spaces and landscaped areas. from the north façade of The Tudor Farmhouse.	
	3.30 The site currently does not currently provide any public access, but this is a topic that could be explored as the detailed principles of the development came forward and could be formalised as part of any future planning application.	
	3.31 The site is contiguous with the northern boundary of the Limits to Development of Barrow-upon Soar on relatively unconstrained land that is the not the subject of any statutory or non-statutory designation that would prohibit its allocation and subsequent development for residential purposes.	
	3.32 This is a sustainable location with unrestricted and relatively	

3.32 This is a sustainable location with unrestricted and relatively

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	commodious access to local services and public transport where development can be delivered in accordance with the development strategy of the emerging local plan, the proposed settlement hierarchy, the vision and development strategy that can deliver circa 200 new homes commencing within 5 years to assist in meeting the housing need of the Borough to 2036.	
	3.33 Initial assessment work in relation to highways, drainage, Master planning/urban design and landscape have not identified any significant issues that would prohibit the development of the site. The illustrative layout for development that has responded to the landform of the site and would deliver new housing in a sustainable location early in the plan period, with a defined character that responds to climate change requirements of new development and that would ensure biodiversity, ecological networks and landscape interests are protected and enhanced together with the landscape qualities of the area, including significant new tree planting (in accordance with draft Policy LP23).	
	3.34 It is recommended that the Site is allocated in the next version of the Local Plan within Policy LP3 as HS54A: Land North of Willow Way, Barrow-upon-Soar for circa 200 dwellings.	
	SITE LOCATION PLAN	
	CONCEPT MASTER PLAN	
EDCLP/182 Pegasus obo David Wilson Homes	Land at Barkby Road, Queniborough, represents a sustainable development opportunity that is in keeping with the form and character of the settlement. The site should be allocated for development in Policy LP3.	The Council acknowledges the submission of additional information for the site "Land off Barkby Road". This information will be used to update the SHELAA (Reference: PSH316), where appropriate, and the site will be assessed as part of the next draft of the local plan.
		The development capacity for the site (150 dwellings) is noted.
		 The Council acknowledges the concerns raised in relation to: Site HS5 has potential heritage impacts on Park Pale. Land at Brook Street, Syston (HS7) involves land in existing

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	Draft Policy LP 3 proposes to allocate a total of 73 sites across the Borough to meet the identified housing requirement over the plan period from 2019 to 2036. The Draft Plan is supported by a Sustainability Appraisal Report (SA) by AECOM (October 2019), which outlines the reasons why the Council's preferred spatial strategy has been selected. Summaries of individual site appraisals are included in Tables 6.2 - 6.18, and for Queniborough, site appraisals are included at Table 6.9, and for Barkby Road, Queniborough, the site is assessed under reference number: PSH 316. The supporting text provided	 employment use. Small sites proposed at Thurmaston involve existing employment land and backland sites in multiple ownership where delivery of the sites might be difficult. Land at Frederick Street (HS17) involves a difficult backland site in multiple ownership. Town Centre Opportunity Sites (HS21, HS22) and other town centre sites (HS19, HS20, HS24) are proposed for development. For the Town Centre Opportunity Sites, development has been promoted for some time with little progress being made on release of these sites for development. Sites proposed for development involve existing car parks and sites in retail use where delivery is questionable. The proposed greenfield extension to the south-west of Loughborough would involve development in an area of high landscape sensitivity. Some 2,000 additional homes are proposed at Shepshed. Combined with the scale of development already accommodated in the settlement, the sustainability of this scale of additional development is questionable. Proposed allocation sites at Rothley are potentially constrained by noise issues and impacts on a listed building. The sites proposed would exacerbate the existing capacity problems at Rothley Primary School with no scope to facilitate the required expansion of the school. For the least sustainable settlements in the hierarchy, the Draft Plan proposes the allocation of some 800 homes. Proposals include the allocation of 223 dwellings at East Goscote, a site recently refused on appeal. This information will be used in the further site assessment that will take place, and will be used to inform the next draft of the local plan.

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	underneath Table 6.9 confirms that of the six Queniborough sites assessed, three are proposed for allocation. The text sets out that the three proposed allocations perform slightly better (than the other three sites) in terms of accessibility, all sites perform similarly (apart from one of the other sites not proposed for allocations), and confirms that the three selected sites are all located closer to the Syston AQMA.	
	Under Section 6.2 of the SA the approach to site selection is set out. This confirms at paragraph 6.2.9 that there were insufficient homes outside of Green Wedge or Areas of Local Separation which had access to hourly public transport to meet the requirement identified for Other Settlements in the preferred hybrid approach. The original approach was therefore taken to identify sites where mitigation of the impact is possible through masterplanning. Where this led to a disproportionate number of sites/homes, an assessment was then undertaken of the comparative impacts of sites in the Areas of Local Separation and this led to a site in Queniborough (Land off Barkby Road) being excluded.	
	David Wilson Homes has interests in land at Barkby Road, Queniborough (PSH 316) and has promoted the site for development through earlier stages of the preparation of the Draft Local Plan. As part of these submissions we have included a completed SHELAA Call for Sites form, as well as an Illustrative Layout Plan, which provides an indication of how the site could be developed to provide up to 150 new dwellings. The design of the Illustrative Masterplan has been landscape-led, to ensure that the separation between Queniborough and Syston is maintained, as well as ensuring that a high-quality urban design solution, sympathetic to the local area can be delivered. A copy of the Illustrative Masterplan is provided at Appendix 1.	
	Whilst the proposed development at Barkby Road will lead to the loss of open land within the designated Area of Local Separation, it will not bring the settlements any closer than they currently exist. The settlements of Queniborough and Syston will remain separated by open land, and will retain their own separate character and identity. The site is located within a framework of residential development to the north and east, and commercial development to the west, and the sensitive development of this site would not result	

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	in the loss of land that is critical to the role and function of the Area of Separation.	
	This issue is considered in detail at Section 6 of the Landscape and Visual Appraisal by Golby and Luck, that accompanied the planning application, and is also the approach that has been taken in recent appeal decisions within Charnwood Borough at Rothley (reference numbers: 2196928 and 2196929) and East Goscote (reference number: 2187470). In this respect, the proposed development clearly maintains the separation between the built-up areas of Queniborough and Syston; whereby the key area of separation is considered to be either side of Melton Road.	
	It is considered that the Council has failed to properly consider the potential for development on the site as part of the emerging Local Plan, and the site can be sensitively developed to ensure that the overall function of the Area of Local Separation is not prejudiced. The site lies within close proximity to extensive facilities and services available in Queniborough, and as set out within the SA, is located further away from the Syston AQMA than those sites in Queniborough that are proposed for allocation. The site at Barkby Road should be included as a proposed allocation under Draft Policy LP 3.	
	Queniborough provides a number of day-to-day facilities and services (as set out in our response to Q4 above). Queniborough is therefore considered to provide sustainable access opportunities, with convenient access to key day-to-day services and facilities, as well as jobs.	
	The Illustrative Masterplan proposals represent a logical rounding off of the settlement, securing a scale and form of development in keeping with the established settlement and local context, particularly in light of the Davidsons Homes Barley Fields development that is now largely built out to the east, the commercial development to the west, and existing residential development directly to the north. The proposal seeks the development of land that is therefore afforded a framework on the northern, western and eastern boundaries (which is represented by the proposed Settlement Boundary). The site is therefore considered a sustainable and appropriate development site within the context of the Area of Local Separation.	

It is important that the selection of sites for allocation takes a balanced view of development

opportunities; sustainable sites should not be discounted on the basis of their location within the Area of Local Separation alone. The current approach taken fails to recognise that the site at Barkby Road, Queniborough can be developed whilst clearly maintaining the separation between the built-up areas of Queniborough and Syston. The site provides an opportunity to provide around 150 dwellings, whilst maintaining the separation distance between the settlements of Queniborough and Syston, and does not prejudice the overall function of the Area of Local Separation; the critical gap of which is considered to be either side of Melton Road.

We have commented separately on the need for the plan to provide greater flexibility to deal with changing circumstances and to take a more realistic view on delivery from the carried forward SUEs. In terms of the proposed allocations as set out in Draft Policy LP 3, there are concerns about the suitability and deliverability of a number of the proposed allocations, which demonstrates the need for the Council to review its proposed allocations. We would make the following comments on the proposed allocations as set out in the Draft Policy.

Loughborough Urban Centre:

For the Loughborough urban area there are a large number of proposed allocations on urban sites where their suitability and deliverability is questionable. Land at Frederick Street (HS17) involves a difficult backland site in multiple ownership. Town Centre Opportunity Sites (HS21, HS22) and other town centre sites (HS19, HS20, HS24) are proposed for development. For the Town Centre Opportunity Sites, development has been promoted for some time with little progress being made on release of these sites for development. Sites proposed for development involve existing car parks and sites in retail use where delivery is questionable. The proposed greenfield extension to the south-west of Loughborough would involve development in an area of high landscape sensitivity.

Other Settlements:

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	For the Other Settlements, the Draft Plan proposes the allocation of some 800 homes. Proposals include the allocation of 124 dwellings at Cossington and 223 dwellings at East Goscote, a site recently refused on appeal. The scale of development proposed in these smaller settlements is not in keeping with the scale of the settlements or their sustainability in terms of access to key services and facilities. The Council needs to review its proposed allocations to ensure that sites proposed for allocation are suitable and deliverable. For the land at Barkby Road, Queniborough, there is the opportunity to allocate land to provide some 150 new dwellings, to include much needed affordable housing. The planning application submitted demonstrates how a high-quality development of up to 150 dwellings can be accommodated on site, reflecting the local context and providing for a high-quality development solution that	
	would not detract from the character or appearance of the settlement. The site is well related to the existing built form and within close proximity to the range of services and facilities available in Queniborough. The site is considered a sustainable and appropriate development site within the context of the Area of Local Separation. Draft Policy LP 3 should be amended to include the allocation of land at Barkby Road, Queniborough to provide 150 dwellings.	
EDCLP/202 Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	Strategic Housing and Employment Land Availability Assessment forms have been completed for Land south of Ashby Road Central, Shepshed, highlighting the availability, suitability and achievability of the site for residential and / or retail development. The forms have been re-submitted alongside this response. The site is well related to the settlement and offers a sustainable development site for housing or retail uses, equally.	The Council acknowledges the submission of the site "Land South of Ashby Road Central, Shepshed".This information will be used to update the SHELAA (where appropriate), and the site will be assessed as part of the next draft of the local plan.The Council also acknowledges the analysis of proposed allocations:
	Not all sites proposed for allocation are suitable, being urban fringe	 Ingelberry Road; and Iveshead Road. Again, this information will be used to shape the next stage of site assessment work, and the next draft of the local plan.
	with limited access to services and subject to other constraints. On the basis that a number of proposed site allocations are not justified or considered to be positively prepared, the soundness of the Plan	

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EDCLP/258 Sam Heaton Heaton Planning on behalf of Swithland Homes Ltd	 is jeopardised. Based on the Site Options summary as set out in the Council's Sustainability Appraisal, allocated sites at Ingleberry Road (ref. PSH405) and Iveshead Road (ref. PSH322) score worse than Land south of Ashby Road Central and are notably therefore less sustainable. Indeed, the site has better connectivity to leisure than at Ingleberry Road scoring 'very good' as opposed to 'neutral', scoring 'neutral' as opposed to 'minor constraint' in respect of land and soil and 'minor constraint' against 'negative' for wind energy. Set against land to the rear of 62 Iveshead Road, Land south of Ashby Road Central scores 'good' and neutral' against 'negative' for access to healthcare and proximity to a primary school, respectively. These sites are not considered to be sustainably located and should be replaced by Land south of Ashby Road Central. Heatons have been instructed by our client, Swithland Homes Limited, to prepare and submit representations in response to the policies as proposed within the Charnwood Local Plan 2019 – 2036 Preferred Options Regulation 18 Draft, published for consultation on 4th November 2019. The new Local Plan will include strategic and detailed policies and it is understood to be prepared to provide for a longer plan period than the adopted Core Strategy, up to 2036. Once adopted, will form part of the development plan and replace the Charnwood Local Plan Core Strategy (2015) and the saved policies from the Borough of Charnwood Local Plan (2004). Background Swithland Homes (herein referred to as the Company) is a privately-owned house builder specialising in offering high-quality residential developments. The Company were established in 2014 and are based in Birstall, Leicestershire. The company has various land interests across the Borough and East Midlands region, and are continuing to grow, with the aim of delivering further bespoke residential solutions for a range of sites. The Company are able to build out multiple	The Council acknowledges the submission of additional information. The Council has received a response in relation to the following sites: 1. Land off Armston Road, Quorn; 2. Land South of Armston Road, Quorn; 3. Land off Loughborough Road, Hathern; 4. Land at 123 Cotes Road, Barrow on Soar; and 5. Land South of Gynsill Lane, Anstey. It is noted that Land off Armston Road, Quorn (Reference: PSH433); Land South of Armston Road, Quorn (Reference: PSH433); Land South of Armston Road, Quorn (Reference: PSH433); Land South of Armston Road, Quorn (Reference: PSH305); Land off Loughborough Road (PSH305); and Land at 123 Cotes Road, Barrow on Soar (Reference: PSH 283) have already been considered via the SHELAA. However, the new information will be used in the next phase of site assessment work. The site "Land South of Gynsill Lane, Anstey" is new. The Council will consider the proforma submitted and the information will be used in the next phase of site assessment work.

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	It is considered by Swithland Homes that within the plan period the Company will be able to significantly increase their capacity and will be able to contribute greatly to the delivery of residential development across Charnwood through a steady supply of new dwellings.	
	Site location plans for each of Swithland Homes' land interests is appended to the below representations. To summarise, this includes the following: • Cotes Road, Barrow; • Quorn; • Gynsill Lane.	
	Draft Charnwood Local Plan 2019-2036 These representations provide a direct response to the relevant questions, proposed policies and allocations in the Preferred Options Draft Charnwood Local Plan specifically relating to housing delivery. The below comments are informed by previous submissions to the Issues and Options representations submitted by Heatons in June 2018.	
	The National Planning Policy Framework (NPPF, February 2019) states that plans should be prepared positively, in a way that is aspirational but deliverable (Paragraph 16). The below is framed against the tests of soundness identified at Paragraph 35 of the NPPF, which states Plans are 'sound' if they are: • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. • Justified – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence; • Effective – deliverable over the plan period; • Consistent with national policy – enabling the delivery of sustainable development.	
	Site location plans for each of Swithland Homes' land interests is appended to the below representations [PDFs supplied]. To summarise, this includes the following: • Cotes Road, Barrow;	
	• Quorn;	
	Gynsill Lane.	
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	As submitted previously, the above-mentioned sites have been submitted for inclusion within the latest Strategic Housing & Employment Land Availability Assessment and to inform further discussions regarding the potential inclusion of each site for residential development within the emerging Local Plan. Conclusion Our client's sites represent sustainable locations to assist in meeting the housing need in Charnwood in such a manner which would be in keeping with the localised landscape and visual character of each area. Each site is available and realistically achievable to deliver housing developments at appropriate densities. Heatons will continue to monitor the emerging Local Plan and we understand a date for the next stage of consultation is yet to be confirmed. We would welcome an opportunity to meet with officers of the local planning authority to discuss our client's land interests and how the delivery of these sites will positively contribute to a stable supply of new homes across the plan period. Should you require any further clarification please do not hesitate to contact	
EDCLP/240 Tim Coleby Stantec obo Barwood Development Securities Ltd (Sileby)	 me. On behalf of our client Barwood Development Securities Ltd., we wish to make the following objections in respect of the above consultation document and the associated Sustainability Assessment dated October 2019. 1. Introduction Our client has an interest in land at Peashill Farm, Sileby, shown outlined in red on the plans within the enclosed Vision Document. We consider that this site (7.26 hectares in area) represents an eminently suitable, achievable and deliverable opportunity for sustainable residential development of approximately 140 dwellings, as a logical second phase of development following the grant of planning permission in 2018 for 170 dwellings as Phase 1 on adjoining land. A reserved matters application has now been submitted for Phase 1 and development on site is due to commence early in 2020. The enclosed Vision Document includes a draft concept masterplan and shows in detail why the site should be allocated for residential 	 The Council acknowledges the submission of additional information for the site "Land at Peashill Farm, Sileby". This information will be used to update the SHELAA (Reference: PSH346), where appropriate, and the site will be assessed as part of the next draft of the local plan. The Council also acknowledges the critique of proposed allocations within the draft local plan. Again, this information will be used to shape the next stage of site assessment work, and the next draft of the local plan. For confirmation, the sites critiqued are: Factory corner of Park Road and Seagrave Road (site HS59); Land rear of The Maltings, High Street (site HS60); 36 Charles Street (site HS61); 9 King Street (site HS62); Kendal Road (site HS63);

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	 development under Draft Policy LP3. In summary, as has already been recognised by the Council in approving the Phase 1 development and in its 2018 SHELAA findings, the site: is in a sustainable location close to key services within Sileby (a defined Service Centre), with opportunities to enhance its accessibility on foot, by cycle (including links through the Phase 1 accessibility on foot, by cycle (including links through the Phase 1 accessibility on foot, by cycle (including links through the Phase 1 accessibility on foot, by cycle (including links through the Phase 1 accessibility on foot, by cycle (including links through the Phase 1 accessibility on foot, by cycle (including links through the Phase 1 accessibility on foot, by cycle (including links through the Phase 1 accessibility on the sustainable nature of the existing bus service through Sileby which will mean the closest bus stop to Peashill Farm Phase 2 is only a 7 minute walk away, thereby enhancing further the sustainable nature of the site and its suitability for housing development; represents a deliverable and viable opportunity with the potential for significant public benefits, including community/employment use of the existing adjoining farm buildings and landscape and open space enhancements; is available now – the Phase 2 development can be built out concurrently with Phase 1 - and can deliver all 140 dwellings by 2025, thereby making a meaningful contribution to the Borough's housing land supply over the next 5 years; is suitable, with no in principle constraints that cannot be mitigated to support a development of the scale identified, including in respect of; access and transport; flooding, drainage and utilities; landscape, visual impact and ecology; and archaeology and heritage; has established boundaries which would form suitable, long term settlement boundaries for the vill	 Barnards Drive (site HS64); Land west of Main St, Cossington (site HS65); and Rear of Derry's Garden Centre, Cossington (site HS66). The Council is confident that the local plan will provide a policy framework to meet the objective local needs on housing and economic development, as per the requirements of the NPPF. The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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	LP3 and contained within the Council's Sustainability Assessment dated October 2019.	
	We also object to Draft Policy LP1 and to the Local Plan Period	
	running only to 2036, for the detailed reasons described below.	
	 2. The Local Plan Period We consider the Local Plan should cover a longer period than 2019 – 2036, for the following reasons: a) Paragraph 22 of the NPPF requires strategic policies in Local Plans to cover "a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure." b) As the draft plan is unlikely to be submitted for examination until the end of 2020 at the earliest, we do not consider it is realistic that the plan will be adopted in 2021. Instead we consider it will not be adopted until 2022 and therefore the plan's timeframe should run 	
	until at least 2037. c) We are also of the view that the draft Plan makes insufficient allowance for the need for Charnwood to accommodate a proportion of the unmet housing needs of the City of Leicester. The level of such needs is only just beginning to emerge and the time needed for all the various local authorities to agree on the means of distributing them amongst adjoining districts and boroughs should	
	not be underestimated. It could well be, therefore, that the draft Charnwood Local Plan is not submitted until well into 2021.	
	 2. a) Furthermore, in December 2018 the Leicester and Leicestershire Strategic Growth Plan to 2050 (the SGP) was approved by the ten founding partner organisations, including Charnwood Borough Council. The SGP is a non-statutory plan which identifies broad locations for ambitious strategic-scale development and the significant infrastructure required to facilitate it and is to be used as part of the evidence base to inform new and emerging local plans throughout the County. b) Having set out this ambitious growth plan, we consider it logical 	
	that the Charnwood Local Plan should accord with the SGP's timeframe as far as possible and therefore it should cover a period	
	 beyond 2036, so that it: conforms with paragraph 22 of the NPPF; and 	
	 optimises the chance for the plan to fully embrace the 	

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	challenges and opportunities provided by the SGP and thereby the prospects for achieving sustainable housing development, economic growth and the range of supporting infrastructure needed to meet SGP aspirations.	
	We object to the omission of our client's site at Sileby from the proposed housing allocations listed in Draft Policy LP3, for the reasons already set out above. We also have concerns about the suitability, availability, viability and deliverability of the proposed housing allocation sites in Sileby and Cossington, as follows and based on: • information contained within the Council's SHELAA 2018 and	
	 the evidence base to the draft Sileby Neighbourhood Plan; and the enclosed critique, prepared by EDP, of the methodology used in the Sustainability Assessment for selecting sites for 	
	 allocation in the Draft Plan. <i>Conclusion</i> Our assessment and EDP's critique of the site selection methodology [PDF available] show that: The site selection methodology used is unclear and flawed in its conclusions; There are concerns about the suitability, viability and deliverability of the sites which have been allocated in Sileby and Cossington; 	
	and • Our client's site is un-fettered by such concerns about suitability, viability or deliverability and it is equally or more sustainable as a location for housing development than the Sileby and Cossington sites which have been allocated.	
	5. Settlement Limit For all the reasons set out above, our client's site at Peashill Farm Phase 2 should also be included within the defined settlement limit of Sileby.	
	6. SHELAA 2019 We also attach an updated 2019 SHELAA proforma relating to the site, to reflect the latest site conditions and circumstances. It confirms that there are no overriding technical, environmental or ownership constraints which would preclude residential development of the site and that such development is suitable, achievable and deliverable within the next 5 years, thereby helping	

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	REPRESENTATION SUMMARY to meet Charnwood's short-term housing needs and sustainable growth aspirations. We trust these representations are helpful at this stage and we look forward to further involvement in the consultation process over the next few months. nineteen47 are instructed to submit representations on behalf of Davidsons Developments Ltd ("Davidsons") and Redrow Homes Limited ("Redrow"), in relation to their land interests to the south west of Loughborough. These two high-quality house-builders jointly hold an option on land contained within SHLAA parcels PSH172 Land to the south of Nanpantan Road and PSH106 Nanpantan Grange, Land south west of Loughborough (see Site Location Plan), which is predominantly owned by The Helen Jean Cope Charity (Charity no. 1125937). The extent of land owned by the Charity is illustrated on the Site Location Plan, which is also accompanied by a completed Call for Sites Proforma to inform the update to the SHLAA. The Helen Jean Cope Charity is based in Loughborough and was formed in 1998 to manage the distribution to charity of Jean Cope's estate, who's family had previously gifted part of The Outwoods and also Jubilee Wood to the town. Over the last 21 years the charity has provided over £5million to assist schools, village halls, churches, playgroups, art festivals, and all manner of groups catering for the needs of young, the old, the disabled, the homeless and the sick. The Charity's Trustees make grants to Registered Charities, usually to achieve specific objectives. Grants normally range in size between £500 and £5000, although larger grants are made in some circumstances. It prefers applications to be from charities based in the East Midlands, but grants are also	OFFICER RESPONSE Noted – support is welcomed. The additional information submitted for proposed allocation HS36 (Reference: Part of PSH106) will be used to inform further site assessment, and the next draft of the local plan. The proposal for "Land South of Nanpantan Road" (Reference: using part of PSH106, and part of PSH172), with a development site which broadly reaches Outwoods Farm in the south, is noted. The supporting information for Land South of Nanpantan Road will be reviewed and considered as part of future site assessment work. The delivery yield of between 400 and 600 dwellings is noted. The extent of the Charity's land ownership versus the proposed extent of development is noted, and will be reflected in the SHELAA and SA processes. The Council welcomes the opportunity to engage with the promoter/developer/agent on this site.
	This letter provides the formal response of Davidsons and Redrow to Charnwood Borough Council's consultation on the Draft	

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	Charnwood Local Plan 2019-2036, and considers the Draft Local Plan, the proposed allocations it contains, and the evidence base upon which it relies. In addition, the representations set out a clear case in support of the allocation of land south of Nanpantan Road for the development of approximately 400 to 600 houses, based upon the principle of Forest Suburbs.	
	However this indicative figure is subject to a detailed assessment and is dependent on matters such as housing mix, etc. It is acknowledged that the current consultation is an 'informal' stage in the Local Plan process. Through discussions with officers at the Council it is evident that the Draft Plan should by no means be read as the final document for submission to the Secretary of State for examination. It is a 'live' document that will evolve through consultation with all relevant stakeholders including landowners, developers, residents etc. The consultation offers the Council the opportunity to gather further information/evidence on its vision, specific policies and, importantly, to demonstrate that its proposed allocations are deliverable in the context of the NPPF.	
	The representations within this letter should be read alongside the accompanying suite of supporting assessments and information, including: • Site Location Plan (nineteen47, ref n1312-001) • Movement Framework Plan (nineteen47, ref n1312-102) • Green Infrastructure Framework Plan (nineteen47, ref n1312-102) • Constraints and Opportunities Plan (nineteen47, ref n1312-003) • Illustrative Masterplan (nineteen47, ref n1312-005) • Illustrative Masterplan with notes (nineteen47, ref n1312-005-01) • Site Vision Document (nineteen47) • Preliminary Drainage Strategy (PJS Consulting Engineers, ref PJS19-57-100) • Ecological Constraints and Opportunities Plan (RammSanderson, ref RSE_3226_01_V1) • Arboricultural Appraisal (RammSanderson, ref RSE_3226_02_v1) • Built Heritage and Archaeology - Constraints and Opportunities (RPS, ref JAC26088)	
	Transport Appraisal (ADC Infrastructure, ref ADC1891-RP-C) Landscape & Visual Baseline Report (Golby+Luck, ref GL0978)	
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	 Housing and Economics Report (Pegasus Group) Utilities Report (UCL, ref C1045-001 (Issue 1)) 	
	In general terms, having established the Development Strategy and apportionment of growth between different settlements (taking into account the comments made above), the identification of suitable growth areas and sites should then be informed by a full understanding of each settlement's constraints and opportunities. In refining options, consideration should be given to areas which include suitable parcels for development as well as the potential for delivering public open space and accessible countryside, recognising that larger sites have the potential to bring forward development whilst also meeting environmental protection and enhancement objectives. Where required, larger sites also have the ability to contribute to and provide wider infrastructure requirements including the extension of public transport routes, education and medical facilities.	
	In addition, the selection of each site needs to be informed by clear evidence of its availability, suitability and achievability, and include a site-specific trajectory for when and how fast it will be delivered. This is necessary to ensure that realistic forecasts are being made, and to demonstrate that the Local Plan's requirements will be delivered by its allocations, both annually and across the plan period.	
	As set out above, we support the identification of Loughborough as a main focus for development within Charnwood and consider it essential that significant allocations are made within the town. In considering broad locations for growth around the town, these representations are supported by a Landscape and Visual Baseline Report which has been prepared by Golby+Luck, which undertakes a high-level assessment of the Loughborough Fringes in Section 3. It identifies that Loughborough is constrained to the south east by an important area of local separation with Quorn, to the east by flood zones along the River Soar, to the north by an area of local separation with Hathern and to the west and north west by Garendon Park and other committed developments which will extend the settlement up to the M1.	
	Land to the south west of Loughborough is not subject to any environmental constraints or other designations which would	

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	prohibit development, subject to addressing the transition between the town to the east and Charnwood Forest to the west. As such, when considered against the wider setting of the town, south west Loughborough is the most sustainable growth option and should be the focus of new development in the town. This is discussed in further detail at the end of these representations in relation to the land being promoted by Davidsons and Redrow, and 10 of 20 in the Vision Document and accompanying technical assessments which support these representations.	
	In respect of the proposed allocations themselves, it is clear at this informal draft consultation stage that further research and evidence is required to justify the proposed sites, confirm their deliverability, and ensure that their constraints and opportunities are understood in full. In particular, we understand that some proposed allocations have been identified by the local planning authority from larger SHLAA sites based primarily upon high-level landscape reviews, but without any input from the parties promoting the site to confirm that the land is in fact available in the configuration proposed, let alone that there are no other technical constraints which may prevent delivery (e.g. access).	
	We are aware that the Council have written to the owners/promoters of each site to seek further information, and that the consultation is also accompanied by a call for sites In this context it is imperative that the Council retains an open mind about which sites are best-suited to accommodate the required level of development, ensuring that the allocations proposed at the next stage of consultation represent the best options available, as demonstrated through a robust and comprehensive evidence base.	
	From an initial review of the information currently available it is clear that a number of the proposed allocations do not take sufficient account of known constraints, and are evidently less suitable for development than other sites, including land south of Nanpantan Road at Loughborough which is promoted within these representations. However, taking into account the Council's approach we have not provided specific commentary on each site at this stage. Instead, we reserve the right to comment further once full site assessments are available.	

In the context that the current consultation is a fact-finding exercise

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	for the Council in respect of the proposed allocations, with no technical supporting information to demonstrate the deliverability of each site or trajectory to show anticipated delivery rates, we would strongly encourage the Council to undertake an interim consultation on these elements prior to the formal Pre-Submission consultation under Regulation 19. It would be inappropriate for this level of information to only be made available at the time of the Regulation 19 consultation without stakeholders previously having been provided the opportunity to submit meaningful representations on the proposed housing sites.	
	Land south of Nanpantan Road Redrow and Davidsons hold an option on land immediately south of Nanpantan Road (see Site Location Plan) which is promoted as being a suitable site for allocation for residential development. Depending on adjacent landowners, this site could in due course form part of a larger development, but as set out in further detail below and in the accompanying Vision Document the land under the control of Redrow and Davidsons represents a suitable, available and achievable option for the delivery of between 400 and 600 dwellings.	
	It is noted that all receipts from the sale of land for housebuilding will be used by the charity to continue providing significant grants exclusively to local charities, as well as to enhance the local landscape through the development itself.	
	Given that it is the main economic and social focus in the Borough a significant proportion of the housing need should be attributed to Loughborough. As set out above in response to Question 8 and Draft Policy LP3 regarding housing sites, land to the south west of Loughborough represents the only logical direction of growth for the town.	
	The key objective for the local planning authority must therefore be to understand fully the constraints and opportunities provided by this area, in order to identify the most suitable areas for allocation of development. The area should be comprehensively planned to maximise opportunities for residential development where appropriate, whilst recognising and responding to the landscape character and taking account of all technical constraints/opportunities (access, drainage, topography etc.). This	

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	will involve collaboration with landowners to the east in order to deliver a comprehensive scheme that could also include additional land to the west (under the ownership of the Charity) that is suitable for recreation, Green Infrastructure and other suitable public service uses.	
	In order to assist the Council in considering the site promoted by Redrow and Davidsons, a number of reports and assessments have been commissioned in support of these representations, to undertake detailed and fine-grained analysis of the area to demonstrate the suitability and deliverability of the site. These reports are submitted under separate cover, but are also summarised below, and have been used to inform the Vision Document and Illustrative Masterplan which show how the site can be brought forward for development under the principle of Forest Suburbs.	
	In particular, it should be highlighted that whilst the Charity's land ownership extends right up to the boundary with Outwoods and Jubilee Wood to the west (as previously identified through the SHLAA process) there is no desire to see development across the whole parcel, but rather that opportunities are taken to maximise the provision of accessible open space and secure an appropriate transition from the town to the countryside in general and Charnwood Forest in particular provided a wider comprehensive scheme including land to the east is brought forward.	
	Landscape and Visual The Landscape and Visual Baseline Report prepared by Golby+Luck in support of these representations has undertaken a detailed analysis of the broad area south west of Loughborough, in order to identify the parcels of land most suited for development, and sets out a landscape strategy for development in this location.	
	The report highlights that the primary constraint to development is the transition between the urban fringe of Loughborough to the east and the edge of Charnwood Forest to the west, which is linked to changing character and topography within the wider area. This forms the starting point for our landscape-led approach to development, which is key to ensuring a successful site which respects and responds to its setting whilst delivering a high-quality scheme in a sustainable location.	

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	Key views have also been taken into account, both of the site itself, and across it to its wider landscape setting. These views confirm the need for development to secure a robust woodland setting for development, creating parcels which are compartmentalised and facilitate significant new areas of landscaping to be incorporated throughout.	
	Another key element is public access, with the site sitting within a wider network of footpaths, byways and bridleways, providing access to the countryside for the surrounding area. The area is a gateway into the Charnwood Forest, and development here provides the opportunity to safeguard, expand and enhance this network to improve the accessibility and recreation function of the area.	
	Having understood these constraints, it is clear that the scale, form, mass and appearance of the development must respond to the transitional quality of the landscape. This has informed the proposed approach of creating small clusters of development in Forest Suburbs, which emphasise the changing character of the development as it moves west from the urban fringe.	
	 The Landscape and Visual Baseline Report identifies the following key landscape guidelines for the successful delivery of the Forest Suburb concept: 1. Ensure that development is retained on the lower lying section; 2. Set development back from the Nanpantan Road frontage to safeguard the view towards Charnwood Forest; 3. Safeguard and enhance the existing public access and recreation function of this landscape. Consider the creation of a Forest Gateway or Hub proving information and services for the 	
	 local user groups; 4. Create a strong framework of woodland and open meadows to replicate the mosaic pattern of land uses that are typical of the Charnwood Forest; 5. Identify development cells that can be pepper-potted within this framework creating the Forest Suburbs that will present as enclaves of development carved out of the mosaic setting of 	
	 woodland and meadows; 6. Secure buildings that reflect the transition from the suburban setting of Loughborough to the rural character of the Charnwood 	

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	Forest. Building scale and materials will be central to this. 7. Avoid built form that would be prominent in views from the ridgeline and Beacon Hill either in height or materials, most notably colour.	
	Highways An initial Transport Appraisal has been prepared by ADC Infrastructure, to understand in greater detail matters related to sustainable transport, vehicular access to the site and potential traffic impacts arising from the development.	
	It demonstrates that the site is in an inherently sustainable location, on the edge of the largest town in Charnwood Borough. There are numerous local facilities and considerable existing infrastructure available to facilitate journeys by sustainable modes of transport, which the development will connect to and enhance. This includes the potential extension of existing bus services 11 and 12 through the site, providing direct access from every part of the site to Loughborough Town Centre.	
	Every opportunity will also be taken to promote travel by walking and cycling, to enable local journeys to schools, shops, work and leisure destinations. The proposed development will provide new and enhanced connections to the existing network of routes.	
	In order to provide vehicular access to the site, including for buses, a number of access options are explored in the Transport Appraisal. These include a ghost island Tjunction on Nanpantan Road to the north of the site, with a potential second access from Watermead Lane. If the wider site were to come forward including land to the east, there is potential for additional access points to be provided from existing residential areas.	
	The traffic impact of the development will need to be studied in greater detail as matters progress. However, travel patterns of existing nearby residents show that most drive to work destinations in Loughborough. As a first resort, mitigation for any increases in traffic must come in the shift to sustainable modes of transport, with localised highway improvements to enhance bus, pedestrian and cycle options being the priority. However, it is considered that significant new highway infrastructure is unlikely to the necessary by way of mitigation in relation to the development of this site.	

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	In light of the above, it is evident that there are no unresolvable transport or highways constraints to the allocation of this site for housing, and that development in this sustainable location will enable full advantage to be taken of maximising journeys by modes other than the private car.	
	Ecology & Arboriculture A site-specific Ecological Constraints and Opportunities plan has been prepared by RammSanderson, and is submitted in support of these representations. The ecological survey identified that the site contains primarily common and widespread habitats, dominated by arable farmland, with hedgerows, arable margins and scattered trees. There are also a number of wet ditches and drains, Wood Brook to the north of the site, and two ponds.	
	In the surrounding area, the Beacon Hill, Hangingstone and Outwoods SSSI is located to the west, providing a suitable habitat for birds. As a result, wintering and breeding bird surveys will be required in due course, along with additional surveys for a number of protected species including white clawed crayfish, otter, water vole and bats.	
	Given that the site is dominated by arable fields and monoculture habitats, there is good potential to provide significant enhancement in ecological terms, through the creation of meadows, enhancing existing ponds and creation of habitats suitable for reptiles. In addition, the Forest Suburb approach will ensure significant areas of new tree planting throughout the site, integrated within the development parcels.	
	An Arboricultural Appraisal has also been prepared by RammSanderson. The Appraisal confirms that the amount of tree cover within the site boundary is relatively low with the majority of existing trees located within the boundary hedgerows and on land adjacent to the site boundaries. The arboricultural constraints to development are therefore considered to localised, with much of the site being clear of trees and therefore free from restriction for development from an arboricultural perspective.	
	This initial Constraints and Opportunities exercise has confirmed that there are no ecological or arboricultural constraints which	

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	indicate the site is not suitable for the proposed development. Furthermore, development can deliver significant improvements, including increasing species and age diversity of the local tree cover leading to a clear net gain in biodiversity.	
	Heritage A Constraints and Opportunities report has been prepared by RPS in respect of both archaeology and built heritage. It confirms that there are no designated heritage assets within the site, but that it forms a small part of the settings to four Grade II listed buildings. Careful consideration will therefore be required through design and landscaping to ensure that any potential harm is prevented, minimised or mitigated, so as to protect the significance of these listed buildings. However, the assessment concludes that there are no built heritage constraints which indicate that the site should not be allocated for development.	
	With regard to archaeology, the site is considered to have a low/negligible potential for significant remains of all periods, although isolated prehistoric finds may be present on the site. The assessment suggests that further archaeological assessment by way of geophysical survey be undertaken in advance of any planning application, but again concludes that there are no archaeological constraints preventing the allocation of the site for development.	
	Utilities Initial enquiries by UCL with statutory undertakers confirms that the site has access to all normal services and utilities, including potable water, sewerage, gas, electricity and telecommunications networks, either within the site or on land immediately adjacent. Further assessment will be undertaken in due course to understand more fully the capacity of these networks, but at this stage the site is evidently well served by all necessary utilities, which do not pose a constraint to the allocation of the site.	
	Ground Conditions, Flood Risk and Drainage A Desk Study has been undertaken by PJS in order to understand the site's ground conditions and flood risk, and inform a potential drainage strategy. It demonstrates that the site sits on a range of superficial deposits and bedrocks, but concludes that further investigation will be required to understand the potential suitability	

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CONCEPTE	for soakaways.	
	The site has been found to be predominantly within Flood Zone 1, classed as being at Very Low risk of flooding, with some areas adjacent to Wood Brook being within Flood Zones 2 and 3 and within the potential extents of flooding should there be a failure of the Nanpantan Reservoir upstream. The main identified risk of flooding is from surface water flooding due to rainfall events.	
	The topography of the site means that a mix of gravity and pumped solutions will be required for foul drainage, and provision made within the site for attenuation basis to accommodate and manage surface water.	
	These conclusions have informed the Vision Document and illustrative masterplan for the site, and demonstrate that there are no constraints to the site's allocation in respect of ground conditions, flood risk or drainage.	
	The site is considered to be a sustainable option for the growth of Loughborough. The emerging proposals for the site have been informed by the technical work carried out to date, not least the Landscape and Visual Baseline Report that has informed the limit of the proposed built development. The development can be brought forward in phases such that development can commence quickly without the need for extensive infrastructure being required upfront. This will assist the Council in being able to demonstrate a five-year housing land supply.	
	Further information about the deliverability of the site, and the way in which the technical reports summarised above have been used to inform the development proposals for the site, is set out in the Vision Document which accompanies these representations.	
	Summary and Conclusions Redrow and Davidsons are keen to work constructively with Charnwood Borough Council in the development of the new Local Plan, and welcome the opportunity to engage with the process through the current informal consultation on the draft Local Plan ahead of the Publication version being produced.	
	These representations seek to provide commentary on the draft	
	400	

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	Local Plan's proposals, identify areas where further information is required, and provide a detailed introduction to the land being promoted by Redrow and Davidsons to the south west of Loughborough.	
	In respect of the Local Plan's strategic objectives, we feel that the current draft is a missed opportunity for the local planning authority to proactively shape the future of Charnwood, addressing past trends of decreasing affordability and maximising the Borough's potential for sustainable growth. The current low growth scenario falls a long way short of being aspirational, and runs the real risk of minimum housing requirements not being met and economic growth not being supported, let alone meeting in full the Borough's affordable housing need, which is both acute and rising. The Council's own evidence demonstrates the ability of the Borough to deliver higher levels of growth, particularly at Loughborough which is the main town in Charnwood and one which has a high capacity to accommodate significant levels of development.	
	The current strategy is also highly dependent on existing allocations and commitments, which comprise approximately two thirds of the proposed housing land supply for the plan period. However, no detailed evidence has been provided to identify the sites which make up this supply, let alone set out their assumed rates of delivery and the overall housing trajectory for the Local Plan. It is therefore impossible to understand whether the Local Plan's housing requirements will in fact be met by the currently identified supply.	
	In apportioning growth, Loughborough should be the clear focus for development in the Borough, being both the largest settlement and also an area with evident capacity to accommodate significant levels of development. At present it is felt that too much growth is being directed to Shepshed, with the Development Strategy failing to take account of the significant levels of development which have already been delivered there, over and above the remaining 830 houses within the committed developments currently relied upon.	
	With particular regard to the individual allocations proposed within the draft Local Plan, further information is required to demonstrate that each site is suitable, available and achievable, with a real prospect of delivery. This needs to be informed by sitespecific	

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	assessments of key constraints, as well as a clear understanding of likely landscape and environmental impacts. This information should be subject to a focused consultation on housing allocations in advance of the Local Plan progressing to the Regulation 19 stage.	
	These representations have been made in respect of land to the south of Nanpantan Road, which is being promoted jointly by Davidsons and Redrow on behalf of The Helen Jean Cope Charity, which is based in Loughborough and committed to delivering real and tangible benefits to the town and local area. The representations include a summary of the detailed technical assessments and research which have been undertaken to inform a landscape-led approach to the development of the site.	
	This approach is expanded upon in the Vision Document accompanying these representations, which shows a potential development of approximately 400-600 houses, based upon the principle of Forest Suburbs which celebrate the site's role as a transition between the urban fringe and Charnwood Forest, ensuring that additional Green Infrastructure is delivered and that development parcels are identified with a keen understanding of the site and its wider setting.	
	In respect of the draft Local Plan's remaining policies, there are a number of instances where further evidence and justification is required, particularly for those policies which seek to duplicate or speed up requirements which are being brought forward through other legislation and/or regulatory regimes (e.g. Building Regulations).	
	We trust that these representations and their accompanying information are of assistance to the Council as it continues to prepare the emerging Local Plan, and we look forward to continuing to work with officers and things progress. In that regard, if there are any specific queries arising from the points made above, then please do not hesitate to contact us.	
EDCLP/206 Guy Longley Pegasus obo Davidsons	Land at East Road, Wymeswold, represents a sustainable development opportunity that is in keeping with the form and character of the settlement. The site should be allocated for development in Policy LP 3.	 The Council acknowledges the additional information provided for sites: Land at East Road, Wymeswold [A] (PSH 167); and Land North of East Road, Wymeswold [B] (PSH 407).
Development Ltd	100	The development capacity of 45 dwellings for Land at East Road,

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(Wymeswold)		Wymeswold [A] (PSH 167); and 145 dwellings at Land North of East Road, Wymeswold [B] (PSH 407).
		The decision-making on site selection is set out in Section 6.2 of the Second Interim Sustainability Appraisal (SA) Report. More specifically, paragraph 6.2.9 sets out how sites within "Other Settlements" were considered.
		The information will be used to update the SHELAA (where necessary) and the sites will be assessed as part of the next draft of the local plan.
	 Draft Policy LP 3 proposes to allocate a total of 73 sites across the Borough to meet the identified housing requirement over the plan period to 2036. The Draft Plan is supported by a Sustainability Appraisal Report (SA) by AECOM, October 2019. This outlines the reasons why the Council's preferred spatial strategy has been selected. Summaries of individual site appraisals are included in Tables 6.2-6.18. For Wymeswold, site appraisals are included at Table 6.6. The table confirms that no sites are proposed for allocation in either Wymeswold, Burton on the Wolds, Cotes, Prestwold, Walton on the Wolds or Hoton, commenting only that no allocations have been made and that 'broadly speaking accessibility is very poor in these settlements'. Davidsons Developments has interests in land at East Road, Wymeswold (PSH 167) and has promoted the site for development through earlier stages of the preparation of the Draft Local Plan. As part of these submissions we have included a completed SHELAA Call for Sites form, as well as a Site Location Plan and Illustrative Layout Plan, which provide an indication of how the site could be developed to provide up to 45 new dwellings. It is considered that the Council has failed to properly consider the potential for development on the site as part of the emerging Local Plan. The Council has proposed allocations in villages in the Other Settlements category that represent less sustainable development opportunities when compared with Wymeswold. The land at East Road should be included as a proposed allocation under Draft Plan at East Road should be included as a proposed allocation under Draft Policy LP 3. 	
	The reasons for not allocating the site at East Road, Wymeswold are not clearly set out within the consultation documentation. Page	

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	 48 of the Sustainability Appraisal (SA), underneath Table 6.6, states that no sites are proposed for allocation and notes that broadly speaking accessibility is very poor in these settlements (meaning Burton on the Wolds, Cotes, Prestwold, Walton on the Wolds, Wymeswold, Hoton). Therefore, no allocations are proposed in any of these settlements. Section 7.14 of the SA provides some additional commentary in relation to 'material assets – increase access to a wide range of services and facilities', and provides an assessment of the specific site allocations in this regard, however fails to consider and compare these to the local services available in settlements where no allocations are proposed. Paragraph 7.14.25 notes that the Other Settlements are less well served by community facilities, services and public transport links, however, considers that the overall growth to these locations. For East Goscote, land off Melton Road (HS67) is allocated for 223 dwellings despite the site recently being dismissed on appeal due to the scale of development proposed. , The scale of development proposed is therefore not in keeping with the scale of the settlements or its sustainability in terms of access to key services and facilities. Paragraph 7.14.26 notes that for East Goscote, a GP, pub and school are within 800m and there is 	
	provision for a small amount of employment growth. In contrast, Wymeswold provides a number of day-to-day facilities and services, including; Granvilles – a convenience store, Wymeswold Pharmacy, The Windmill Inn Public House, The Three Crowns Public House, Hammer and Pincers Restaurant, Wymeswold Church of England Primary School, St Mary's Church, the Wesleyan Chapel, Wymeswold Memorial Village Hall and a Scouts Hut. All of these facilities and services are located within Wymeswold village itself, and are therefore in walking/cycling distance of the site off East Road. Wymeswold Industrial Park and The Defence and National Rehabilitation Centre are both within close proximity of the settlement. Wymeswold is therefore considered to provide sustainable access opportunities, with convenient access to a range of key day-to-day services and facilities, as well as jobs.	

It is important that the selection of sites for allocation takes a

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	balanced view of development opportunities. This should include the recognition and assessment of day-to-day services and facilities within settlements, as well as their public transport linkages. The approach taken in the Charnwood Settlement Hierarchy Assessment, March 2018 and the Sustainability Assessment, fails to recognise the importance of access to day-to- day facilities in smaller communities, placing undue weight on the quality of public transport services. Whilst bus services at Wymeswold are limited, the settlement has key services catering for day-to-day needs including a local shop. In our view, this makes the settlement a more sustainable location to accommodate some growth than other smaller settlements proposed to take growth which have very limited services meeting day to day needs. It is highly unlikely that residents would make use of public transport to travel to the nearest shop to meet their day to day needs. The current approach taken fails to recognise the range of day-to-day facilities and services in Wymeswold, and instead appears to rule out allocations in these settlements based on accessibility by public transport methods alone. On a proper assessment, Wymeswold represents a more sustainable location to accommodate some limited growth in keeping with the scale and character of the settlement.	
	We have commented separately on the need for the plan to provide greater flexibility to deal with changing circumstances and to take a more realistic view on delivery from the carried forward SUEs. In terms of the proposed allocations as set out in Draft Policy LP 3, there are concerns about the suitability and deliverability of a number of the proposed allocations, which demonstrates the need for the Council to review its proposed allocations. We would make the following comments on the proposed allocations as set out in the Draft Policy.	
	For the proposed allocations adjoining the Leicester urban area, site HS5 has potential heritage impacts on Park Pale. Land at Brook Street, Syston (HS7) involves land in existing employment	

use. Small sites proposed at Thurmaston involve existing employment land and backland sites in multiple ownership where delivery of the sites might be difficult.

Loughborough Urban Centre:

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	For the Loughborough urban area there are a large number of proposed allocations on urban sites where their suitability and deliverability is questionable. Land at Frederick Street (HS17) involves a difficult backland site in multiple ownership. Town Centre Opportunity Sites (HS21, HS22) and other town centre sites (HS19, HS20, HS24) are proposed for development. For the Town Centre Opportunity Sites, development has been promoted for some time with little progress being made on release of these sites for development. Sites proposed for development involve existing car parks and sites in retail use where delivery is questionable. The proposed greenfield extension to the south-west of Loughborough would involve development in an area of high landscape sensitivity.	
	Shepshed Urban Area: Some 2,000 additional homes are proposed at Shepshed. Combined with the scale of development already accommodated in the settlement, the sustainability of this scale of additional development is questionable.	
	Service Centres: Proposed allocation sites at Rothley are potentially constrained by noise issues and impacts on a listed building.	
	Other Settlements: For the least sustainable settlements in the hierarchy, the Draft Plan proposes the allocation of some 800 homes. Proposals include the allocation of 223 dwellings at East Goscote, a site recently refused on appeal. The scale of development proposed in this smaller settlement is not in keeping with the scale of the settlements or their sustainability in terms of access to key services and facilities. The Council needs to review its proposed allocations to ensure that sites proposed for allocation are suitable and deliverable.	
	For the land at East Road, Wymeswold, there is the opportunity to allocate land to provide some 45 new dwellings, to include much needed affordable housing. The planning application submitted demonstrates how a high-quality development of up to 45 dwellings can be accommodated on site, reflecting the local context and providing for a high quality development solution that would not detract from the character or appearance of the settlement. The planning application is accompanied by a full range of supporting	

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	REPRESENTATION SUMMARY technical studies which confirm that there are no technical constraints to development. For completeness a copy of the Design and Access Statement and Illustrative Masterplan for the application are included with these submissions. The site is well related to the existing built form and within close proximity to the range of services and facilities available in Wymeswold. Draft Policy LP 3 should be amended to include the allocation of land at East Road to provide 45 dwellings. The land at Groby Road, Anstey represents a sustainable development opportunity that should be allocated for development in Policy LP 3.	 The Council acknowledges the additional information of the site "Land at Groby Road, Anstey" (Reference: PSH389). This information will be used to update the SHELAA, where appropriate, and assessed as part of the next draft of the local plan. The critique of proposed allocations is noted, including on the following sites: HS5 – Land at Gynsill Lane and Anstey Lane; HS7 - Land at Brook Street, Syston; Small sites proposed at Thurmaston; Loughborough Urban Centre - proposed allocations on urban sites; HS17 - Land at Frederick Street; HS19, HS20, HS21, HS22 and HS24 - Town Centre Opportunity Sites; The proposed extension to the south of Loughborough; The overall development capacity in the Shepshed Urban Area;
		 The proposed allocation sites at Rothley; and Overall development capacity at the Other Settlements. The information submitted as part of the critique will be used to inform the next stage of the local plan, with site assessments re-considered,
	Draft Policy LP 3, proposes to allocate a total of 73 sites across the Borough to meet the identified housing requirement over the plan period to 2036. The Draft Plan is supported by a Sustainability Appraisal Report (SA) by AECOM, October 2019. This outlines the reasons why the Council's preferred spatial strategy has been selected. Summaries of individual site appraisals are included in Tables 6.2-6.18. For Anstey, site appraisals are included at Table 6.2. The table refers to two sites, Gynsill Lane (PHS144) and High Leys Farm (PSH387) to provide 230 homes.	where appropriate.

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	Davidsons Developments has interests in land off Groby Road (PSH389) and has promoted the site for development through earlier stages of the preparation of the Draft Local Plan. As part of these submissions we have included a Vision Document setting out the potential for varying scales of development on the site, along with a new Country Park to provide informal recreation, the potential to facilitate an extension to Anstey Latimer Primary school and local highway improvements to provide an all-movement junction at the Groby Road/A50 junction. [Supporting PDFs available]	
	The Council has failed to properly consider the potential for development on the site, and the potential benefits associated with development in this location.	
	The reasons for not allocating the land at Groby Road are not clearly set out. Paragraph 6.2.8 of the SA advises that, for the Service Centres, all sites in proposed Areas of Local Separation or Green Wedge were avoided rather than mitigated. On the scoring of sites set out in Table 6.2, the land at Groby Road actually performs more positively than the land at High Leys Farm – a 'score' of +8 compared with +4.	
	Part of the land at Groby Road falls within the Green Wedge between Anstey and Glenfield. The proposals would not extend development further south than existing built development on the edge of Anstey. The area of Green Wedge between Groby Road and Leicester Road/Gynsills Lane at the moment provides limited functional benefits in terms of recreational access. The proposals would also deliver positive benefits through securing increased recreational access to the Green Wedge through the introduction of a Country Park on the wider land holding. This is a positive benefit to the Green Wedge should be considered.	
	The approach the Council has taken appears to have been to treat Green Wedge as an absolute constraint and discount sites that would impinge on existing areas of Green Wedge. It is not the function of Green Wedges for them to be treated as tantamount to Green Belt. They are intended to influence the form and direction of built development and are reviewable. The Council should revisit the assessment of opportunities for development around Anstey, balancing the benefits of development on land at Groby Road with	
	balancing the benefits of development on land at Groby Road with	

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	 the limited incursion into Green Wedge land. In support of these representations, a Landscape and Visual Baseline Report has been prepared by Golby + Luck looking at how the development can be accommodated without prejudicing the function of the Green Wedge and avoiding significant landscape impacts. The report concludes that the land at Groby Road can be brought forward for development without compromising the role and function of this designation. It is noted that in the Landscape Sensitivity Assessment undertaken by for the Council by LUC, all SHLAA sites to the south and south-west of Anstey were identified as having moderate sensitivity to development. In our assessment, SHLAA sites off Bradgate Road, including the site proposed for allocation at High Leys Farm would be likely to have greater landscape impact than development off Groby Road which is well related to recent new built development that has taken place in this location. For the land at Groby Road, the SA identifies a potential negative impact in relation to the possible pollution of the Rothley Brook arising from the development. There is no evidence to presented to justify this assessment. For the developments already undertaken by Davidsons at St James Gate, there has been no record of pollution to the Rothley Brook either through the construction or operational phases of the development. This demonstrates that development can take place in this location without any negative 	OFFICER RESPONSE
	 impacts on Rothley Brook. For the proposed allocation site at High Leys Farm, the SA at paragraph notes potential heritage impacts due to the fact that the site adjoins the Conservation Area and is close to a number of Listed Buildings. The land at Groby Road is not subject to any heritage constraints. On this basis it is considered that the Council has failed to properly appraise the opportunity for sustainable development at Groby Road, Anstey. Discounting any development in Green Wedge means that the sustainability of the proposal and potential benefits associated with improved recreational access to the Green Wedge and facilitating the expansion of Rothley Primary School, have not been properly assessed as part of the site selection process. 	

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	Analysis of Leicestershire County Council's Local Plan Mitigation Testing Report, June 2019, indicates that a reasonable level of growth can take place in the Anstey area without significant transport impacts. An important benefit associated with the proposals for development at Groby Road is the scope to secure local highway improvements by altering the restricted Groby Road/A520 to all way movements. In support of these representations a report by ADC Infrastructure has been prepared summarising the highway and flood risk and drainage work undertaken to support the development proposals.	
	The proposals for development at Groby Road offer a range of development scenarios, ranging from the development of land to the north of Groby Road, development on separate parcels to the south, or a more comprehensive development solution. For the land to the north of Groby Road, if the Council continue to pursue the allocation of land at High Leys Farm, there is the potential to investigate the provision of a highway link between the two sites.	
	We have commented separately on the need for the plan to provide greater flexibility to deal with changing circumstances and to take a more realistic view on delivery from the carried forward SUEs. In terms of the proposed allocations as set out in Draft Policy LP 3, there are concerns about the suitability and deliverability of a number of the proposed allocations, which demonstrates the need for the Council to review its proposed allocations. We would make the following comments on the proposed allocations as set out in the Draft Policy.	
	Leicester Urban Area: For the proposed allocations adjoining the Leicester urban area, the southernmost part of site HS5 has the potential to result in heritage impacts on Park Pale. Land at Brook Street, Syston (HS7) involves land in existing employment use. Small sites proposed at Thurmaston involve existing employment land and backland sites in multiple ownership where delivery of the sites might be difficult.	
	Loughborough Urban Centre: For the Loughborough urban area there are a large number of proposed allocations on urban sites where their suitability and deliverability is questionable. Land at Frederick Street (HS17) involves a difficult backland site in multiple ownership. Town Centre	

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	Opportunity Sites (HS21, HS22) and other town centre sites (HS19, HS20, HS24) are proposed for development. For the Town Centre Opportunity Sites, development has been promoted for some time with little progress being made on release of these sites for development. Sites proposed for development involve existing car parks and sites in retail use where delivery is questionable. The proposed greenfield extension to the south of Loughborough would involve development in an area of medium landscape sensitivity with potential impacts on the separation between Loughborough and Quorn.	
	Shepshed Urban Area: Some 2,000 additional homes are proposed at Shepshed. Combined with the scale of development already accommodated in the settlement, the sustainability of this scale of additional development is questionable.	
	Service Centres: Proposed allocation sites at Rothley are potentially constrained by noise issues and impacts on a listed building.	
	Other Settlements: For the least sustainable settlements in the hierarchy, the Draft Plan proposes the allocation of some 800 homes. Proposals include the allocation of 223 dwellings at East Goscote, a site recently refused on appeal due to the inappropriate scale of development proposed. The Council needs to review its proposed allocations to ensure that sites proposed for allocation are suitable and deliverable.	
	The land at Groby Road, offers a highly sustainable development opportunity to accommodate new housing growth in one of the more sustainable larger settlements in the Borough. In discounting sites in the Green Wedge, the Council has not properly considered the benefits of development in this location with the limited impact on the wider Green Wedge. The site relates well to the recent development in this location undertaken by Davidsons. The location enjoys good access to public transport with services providing frequent connectivity to Beaumont Leys and Leicester. The	
	proposals would secure a new Country Park to provide for improved recreational access to the Green Wedge, along with the potential to facilitate the expansion of Anstey Latimer School and 411	

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	provide local highway benefits. The site can provide a range of development scales up to 500 homes, depending on the Council's strategic requirements. The site should be identified as an allocation in Draft Policy LP 3.	
EDCLP/180 Alex Prowse Astill Planning Consultants obo Mr Fothergill		The Council acknowledges the additional information of the site "Land Adjacent to 55 Main Street in Ratcliffe on the Wreake" (Reference: PSH445). This information will be used to update the SHELAA, where appropriate; and the site will be assessed as part of the next draft of the local plan. The proposal for the site to be identified and nominated for self-build and custom-built is noted.
	 buildings within the immediate vicinity of the site. The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 1 and thus it has a low probability of fluvial or tidal flooding. 	

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 REPRESENTATION SUMMARY It is proposed that the site is allocated for the development of up to 10 residential units. Open to exploring the potential opportunities for the site to be allocated solely for serviced plots for self-build and custom-build housing. A new vehicular access to the site would be provided directly from Main Street. Concerns over: standard methodology shows that Charnwood has an annual need for 1,082 new homes in contrast, the data in the Charnwood Local Plan Authority Monitoring Report 2017 to 2018 shows that on average circa 772 dwellings have been delivered per annum over the last seven years within the Borough. Draft Local Plan sets out a strategy to deliver three proposed Sustainable Urban Extensions (SUEs, which means that circa 43% of the Borough's proposed housing requirement will need to be delivered at these three SUEs during the plan period. housing delivery at the SUEs has a history of being delayed. This reinforces the importance of avoiding a situation whereby a significant proportion of the new residential development required in the Borough is focussed on a few large sites in a few locations. It is also noted that the Draft Local Plan does not include a housing trajectory. It is important to consider these issues within the context of footnote 7 to paragraph 11 of the NPPF, which highlights that from November 2020 the presumption in favour of sustainable development will apply in local authority areas where the Government's Housing Delivery Test indicates housing delivery was below 75% of the housing required over the previous three years. 	OFFICER RESPONSE
 In light of this, it is considered that the Local Plan should seek to support the strategic allocations with a sufficient number and variety of other smaller site allocations. It is recommended that a greater number of small sites should be allocated for residential development in order to improve the Council's ability to achieve its ambition to deliver 10% of the Borough's new homes on sites of one hectare or less. 	
	 It is proposed that the site is allocated for the development of up to 10 residential units. Open to exploring the potential opportunities for the site to be allocated solely for serviced plots for self-build and custom-build housing. A new vehicular access to the site would be provided directly from Main Street. Concerns over: standard methodology shows that Charnwood has an annual need for 1,082 new homes in contrast, the data in the Charnwood Local Plan Authority Monitoring Report 2017 to 2018 shows that on average circa 772 dwellings have been delivered per annum over the last seven years within the Borough. Draft Local Plan sets out a strategy to deliver three proposed Sustainable Urban Extensions (SUEs, which means that circa 43% of the Borough's proposed housing requirement will need to be delivered at these three SUEs during the plan period. housing delivery at the SUEs has a history of being delayed. This reinforces the importance of avoiding a situation whereby a significant proportion of the new residential development required in the Borough 11 of the NPPF, which highlights that from November 2020 the presumption in favour of sustainable development will apply in local authority areas where the Government's Housing Delivery Test indicates housing delivery was below 75% of the housing required over the previous three years. In light of this, it is considered that the Local Plan should seek to support the strategic allocations. It is recommended that a greater number of small sites should be allocated for residential development in order to improve the Council's ability to achieve its ambition to deliver 10% of the

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RESPONSE NO/ CONSULTEE	 REPRESENTATION SUMMARY during years 0-5 of the new Local Plan. Thus, the site would make a positive contribution towards helping the Council to achieve the required levels of housing delivery in the early years of the plan period. Furthermore, the site is situated immediately adjacent to the existing built form of Ratcliffe on the Wreake. It is therefore considered to represent a logical location for a small-scale extension of the village. The north-western boundary of the site has been sensitively positioned to ensure that it is broadly in line with the extent of the built form to the south-west. This should help to integrate the scheme into the local built and natural environment. There would also be scope for the homes to incorporate sustainable construction methods. A Strategic Housing and Employment Land Availability Assessment form has been completed for the site and accompanies these written representations. It is considered that the following additional mechanisms should be added Draft Policy LP 8 to strengthen the Council's ability to secure the delivery of an adequate number of serviced plots to meet the demand for self-build and custom-build housing where landowners and promotors have expressed a willingness for this type of development to come forward on their land. Establish that where demand for self-build and custom-build housing is not being met in the Borough, small-scale opportunities for self-build and custom-build 	OFFICER RESPONSE
	 expressed a willingness for this type of development to come forward on their land. Establish that where demand for self-build and custom-build housing is not being met in the Borough, small- 	
	 Our client is willing to hold discussions with planning officers at Charnwood Borough Council as part of the plan-making process to explore the opportunities available for allocating the site solely for serviced plots for self-build and custom housebuilding. The Council's proposed approach towards affordable housing contributions on self- and custom-build development sites is supported in principle. 	

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	 Robust testing needs to take place to assess the impacts of complying with the accessibility requirements in Draft Policy LP 6 on the viability of housing development in order to ensure that the policy will not undermine the deliverability of the plan. Residential development on the site would make a positive contribution towards achieving the three dimensions of sustainable development. Ratcliffe on the Wreake benefits from good accessibility to the strategic road network which provides vehicular access to Leicester and Loughborough. The site is situated immediately adjacent to the existing built form of Ratcliffe on the Wreake and therefore represents a logical location for the small-scale expansion of the village to support local housing needs and the future vitality and viability of the settlement. New housing development could be developed on the site in a sensitive manner to facilitate its successful integration into the natural environment and local landscape setting. 	
EDCLP/178 Mark Rose Define obo Bloor Homes	 I write on behalf of my clients Bloor Homes Ltd, who welcome the preparation of the Charnwood Local Plan (CLP) and this submission relates specifically to their remaining land interests at Fairhaven Farm, Anstey. Bloor Homes control further land adjacent to their development site at Fairhaven Farm, Anstey. That land currently forms part of the wider Fairhaven Farm site referred to in the 2017 SHLAA (PSH1), but given the development that is now underway, it is considered that the additional land should be considered as a development allocation in its own right and a SHLAA submission was made to that end in 2018. The provision of rural housing and the support that provides for rural communities and specifically the services and facilities on which they rely, is a key policy imperative. Anstey is, therefore, an entirely appropriate location for future residential development that can address the identified housing need arising within the Borough and that is clearly recognised in the Consultation Document that identifies it as a key Service Centre. Moreover, Anstey is located close to Leicester, where it 	The Council acknowledges the additional information of the site "Land at Fairhaven Farm, Anstey" (Reference: PSH1). This information will be used to update the SHELAA, where appropriate; and the site will be assessed as part of the next draft of the local plan.

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EDCLP/176 Hannah Post	•	has been established that there is insufficient capacity to accommodate the development required to meet its own identified housing needs. The site itself is immediately available for residential development and there are no known constraints to delivery. It is, therefore, a realisable opportunity that would make a significant contribution to meeting the identified market and affordable housing needs within the plan period. We write on behalf of Michelmersh Brick Holdings Plc (the 'Client') in respect of their land interest at Land south of Ashby	The Council acknowledges the additional information of the site "Land south of Ashby Road Central, Shepshed" (Reference: Eastern Part of
Barton Willmore obo Michelmersh Brick Holdings Plc	•	Road Central, Shepshed (the 'Site') A Site Location Plan setting out the extent of the Site has been attached at Appendix 1 [PDF available] and an Illustrative Layout is attached at Appendix 2 [PDF available]. The Site is located on the southern edge of Shepshed and is approximately 11.12 hectares in size. The Site has predominately been used for clay mineral extraction with an area of grassland in the east part of the Site. A concept masterplan showing the site proposal has been	 PSH138). The information will be considered as part of any update to the SHELAA, and will inform the next stage of the draft local plan. The Council notes the critique of other proposed allocations, namely: HS43; HS48; and HS44.
	•	provided and demonstrates how the Site could deliver approximately 200 dwellings together with areas of publicly accessible open space and enhanced landscaping. The Site is entirely within Flood Zone 1 and is predominately at low risk of surface water flooding. There are understood to be no designated heritage assets within or near to the Site. The Site is within the National Forest and is closely located to several SSSI's including Newhurst Quarry (adjoins B591to the east of the Site), Ives Head (Approx. 600m south) and Morley Quarry Local Nature Reserve adjoins the Site to the west. The adopted Local Plan also	The information in the critique will be considered as part of any update to the SHELAA, and will inform the next stage of the draft local plan.
	•	identifies the Site as being located in an Area of Particularly Attractive Countryside and being situated outside the Limits of Development of Shepshed. In 2014 a request for a Screening Opinion relating to a proposed residential development of up to 300 dwellings and associated was submitted to the Council and the decision was that an Environmental Assessment would be required (P/14/0597/2). This was then followed by the submission of an Outline planning application for the erection of up to 200 dwellings which was withdrawn in March 2016 (P/14/2358/2). Main vehicle access is proposed off Ashby Road Central where	

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	 safe access can be achieved. This access road then forms the main road through the development, with several internal roads leading off to areas of residential development. The illustrative proposal is informed by a landscape led approach where retaining existing landscaping and enhancing planting across the Site features heavily. The south area of the Site is proposed to be heavily planted to create an attractive boundary to the countryside south of the Site and a large area of publicly accessible open space is proposed in the east area of the Site which could include a children's play area. Footpath links are proposed throughout the Site and linking to the 	
	 surrounding area. Having reviewed the Sites currently included in the draft Policy, our Client's Site is a more sustainable option than a number of these sites. The main reason for this being that a number of proposed allocations, namely HS43, HS48 and HS44 are detached from the settlements of Shepshed and whilst our Client does not object to these allocations, their Site is well connected to Shepshed physically and is a logical extension to the settlement. We have submitted with these representations a completed SHELAA Call for Sites Form for the Site to be considered. Our Client would welcome the opportunity to meet with Officers to discuss the proposals. If Officers could therefore advise of a convenient date to meet, we would be pleased to discuss the 	
EDCLP/152 Adam Murray Andrew Granger & Co Ltd obo landowner clients	 proposals in greater detail. On behalf of Mr & Mrs Morison, we are seeking to work with Charnwood Borough Council in promoting the land west of Anstey Lane, Thurcaston (Appendix 1) for formal allocation for residential development. The Thurcaston and Cropston Neighbourhood Plan 2015-2028 was made in December 2016 following a successful public referendum. The Plan sets out the spatial strategy and development management policies for the villages of Thurcaston and Cropston. The proposed development site is located outside of the Limits to Development identified by Policy T&C2: Limits to Development of the adopted Neighbourhood Plan and as such is considered to be Open Countryside. The site is not subject to any further policy designations within the Neighbourhood Plan. The proposed development site comprises an area of 	 The Council acknowledges the submission of the site "Land West of Anstey Lane, Thurcaston". The site will be added to the SHELAA, and the site will be assessed as part of the next draft of the local plan. The Council acknowledges the potential for the site to meet the aspiration for 10% of new homes on sites less than 1Ha. The extent of each ALS has been determined based upon the evidence that supported the draft local plan. Draft Local Policy 19 is clear that the extent of each ALS will be protected, with ALS6 (Thurcaston / Cropston / The Ridgeway Area of Rothley) maintained.

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	 agricultural land located off Anstey Lane, to the west of the centre of Thurcaston. The site covers an area of approximately 0.61 hectares (1.5 acres) and consists of a single field of Grade 3 agricultural land, accessed via Anstey Lane, as shown outlined in red in Figure 1 below. [Blan available] 	
	 below. [Plan available] The site is bound to the north by an approved planning permission for residential development of a single plot [LPA Ref: P/18/1241/2], to the east by Anstey Lane and the residential properties fronting this road, to the west by Rothley Brook and to the south by further agricultural land. 	
	 The site lies within the Thurcaston Conservation Area, as first designated by Charnwood Borough Council in March 1988, and is within close proximity of a number of listed buildings including Bybrook Farm Cottage (Grade II), Bybrook Farmhouse (Grade II), and the Barn at Bybrook Farm (Grade II). The western boundary of the site is located within Flood Zone 2/3, as shown in Figure 2 below. 	
	 Thurcaston benefits from a small number of services and facilities including the Richard Hill Church of England Primary School, All Saints Church, the Wheatsheaf Inn and a number of small local businesses. 	
	 The village is also located in relatively close proximity to the services and facilities available in Leicester City Centre (approx. 5.8 miles), Anstey (approx. 2 miles), Rothley (approx. 2 miles), Mountsorrel (approx. 3 miles) and Glenfield (approx. 4.4 miles). The site benefits from access to public transport opportunities, the nearest bus stop is positioned outside the Wheatsheaf Inn, located approximately 100 metres from the site entrance. The bus stop is served by the 154 bus service which runs between Leicester City Centre and Loughborough and calls at the village hourly between 7am and 7pm on Mondays to Saturdays. We consider that the site has the capacity to accommodate approximately 6 dwellings, and in line with the adopted Neighbourhood Plan and the objectives of the emerging Local Plan, we propose to deliver a mix of property types and sizes. 	
	 The existing access situated on Anstey Lane, between 23 Anstey Lane and 36 Wallis Close, would be upgraded as part of any development proposals. We believe the distribution of housing allocations at the 'Other 	

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	 Settlements' is not consistent with the principles of the spatial strategy. The proposed housing allocations are directed towards 5 of the 14 villages identified at this level of the settlement hierarchy and, in particular, East Goscote is expected to deliver 28% of the housing requirement for this level. It is our view that this does not appropriately avoid 'overloading a particular village or group of villages' as stated by the Draft Local Plan and would result in a disproportionate level of growth within the selected settlements. Consequently, it is our view that the housing requirement for Other Settlements should be more evenly distributed across the settlements identified at this level of the hierarchy. Where sites are required to deliver housing within Thurcaston, we propose land to the west of Anstey Lane as a prospective allocation. Any development scheme would be designed to ensure that it reflects the site's location within the Thurcaston Conservation Area and within close proximity to a number of listed heritage assets. It is our view that the Local Plan should identify a minimum 10% supply-side buffer and, therefore, land needs to be identified for an additional 500 dwellings over and above the current draft housing allocations. Finally, we object to the designation of our client's land as an Area of Local Separation outside of the Limits to Development for Thurcaston. It is our view that Rothley Brook provides a natural barrier to development to the west of Thurcaston and would appropriately reflect the extent to which existing properties and planning approvals have extended the village 	
EDCLP/152 Adam Murray Andrew Granger & Co Ltd obo landowner clients	 envelope to the west. Mr and Mrs Crooks, who are the owners of the land south of Melton Road, Barrow Upon Soar which is proposed for allocation for residential development within the Draft Plan. Barrow Upon Soar is identified within the Draft Settlement Hierarchy as a 'Service Centre'; where there are considered to be a good range of services and facilities to meet the day to day needs of residents and, as such, is an appropriate location to accommodate a level of growth. The village benefits from a Co-Op Food Store, Health Centre, Primary and Secondary School, a Church, a number of public 	Noted – support is welcome. The suitability, availability, and achievability information submitted will be used to update the SHELAA (where necessary) and will be used to inform the next draft of the local plan.

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	 houses and eateries, and a range of small local businesses. The village also benefits from good access to public transport opportunities, including a railway station, which provides connections to Leicester, Loughborough, Nottingham and Lincoln. There are also bus services including the Kinchbus 2 service which serves Cossington, Quorn, Leicester, Birstall, Sileby and Loughborough; and the No27 service which connects the village to Loughborough, Walton, Seagrave and Thurmaston Shopping Centre In particular, we fully support the allocation of Site HS53: Land South of Melton Road, Barrow Upon Soar for residential development of approximately 130 dwellings. We consider the site represents a deliverable and developable source of housing land that can make a positive contribution towards meeting the identified local housing need. There are no known physical/environmental constraints which would prevent the site coming forward for development. There is strong developer interest in the site, and we are anticipating that our clients will be in a position to appoint a developer/promoter shortly. We consider the site has the capacity to deliver approximately 130 dwellings with associated vehicular access, pedestrian links, public open space, car parking, landscaping and drainage. Any development of the site would deliver a range of property types and sizes; and would include the identified affordable housing requirement, subject to the appropriate viability assessment. 	
EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	 The following representations are made which seek the allocation of circa 160 dwellings on land to the east of Main Street, Sileby ('the Site') together with associated highway access, drainage and open space. The Site extends to approximately 15.84 acres/6.41 hectares, which is currently in arable use. The Site is sustainably located in relation to the range of services in Sileby, including shops, medical facilities and local schools. The site lies immediately to the south of existing development on Main Street and housing is also bordering the site on the west side of Main Street. It is also well placed in relation to accessibility by road and train to higher order centres in Leicester, Loughborough and Nottingham. 	The Council acknowledges the submission of the site "Land at Main Street, Sileby. The site will be added to the SHELAA, and will the site assessment work will inform the next stage of the draft local plan.

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	 Sileby is proposed to remain as one of six Service Centres within the Settlement Hierarchy, which have 'a range and choice of services and facilities that meet he day to day needs of residents and physically and functionally forms part of the wider Leicester or Loughborough Urban Area'. This proposal is therefore consistent with the preferred development strategy of the emerging Local Plan The Site can be accessed directly from Main Street and it is in single ownership making it readily available, achievable and deliverable to commence contributing towards the housing needs of the Borough an early stage following allocation. This representation has been informed by initial highway, Master planning and landscape advice provided by RPS (Brian Plumb), Pegasus Urban Design (Paul Smith) and LDA Design (Nicola Longland), respectively. 	
	Highways Representations (RPS – Brian Plumb)	
	 This initial Transport Appraisal has been prepared by RPS Access to be taken from Cossington Road. 	
	 Access to be taken from Cossington Road. The site fronts onto Cossington Road which connects Sileby to the north with Cossington to the south. Further to the south access can be taken to the A46, A6 and broader highway network. Cossington Road is circa 6.5m wide road, with footways to the both sides of the road. 	
	• The speed of the road over the site frontage is 30mph with a fairly straight alignment. Within the site frontage which extends over some 130m, there is an existing field access.	
	• To the north of the site Sileby has a number of local facilities within the Town including Retail facilities, Doctors surgery, Community facilities and Primary Schools. These facilities are circa 1.0km from the site and all within a walkable distance from the site.	
	 Also, within the Town, and circa 1.0km from the site, is the Rail station which provides an hourly service to Loughborough, East Midlands Parkway, Nottingham, Lincoln and Leicester. In addition to this rail service, bus services pass the site with the Number 2 bus service providing a half hourly service between Leicester and Loughborough. Hence the site has access to sustainable transport together with local facilities within walking distance of the site. 	
	 As identified above, the site frontage extends to some 130m 	

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	 which allows the provision of a priority junction within the frontage to serve the site and accommodate the necessary visibility splays for the 30mph speed limit. In accordance with Manuals for Streets the visibility requirements for 30mph are 43m in each direction. In practice visibility splays in excess of this can be achieved from the proposed site access. The level of traffic generated by a development of circa 160 dwellings would be in the region of 80 vehicles two way in the peak hours. Such levels of traffic can be accommodated by a simple priority junction without the need to provide right turn lanes etc. In terms of the impact of the development traffic from the site, it is considered that the traffic from the development will disperse on a fairly even basis both north and south from the site, with a slightly higher preponderance to the south. Whilst detailed transport assessment work would support any application for the development, it is considered that the impact of the development site is well located for access to the local facilities within Sileby with the main facilities being within circa 1.0km of the site and a walkable distance. These facilities include for the Rail Station and existing bus services. Access can be provided to the site from Cossington Road over the site frontage with the provision of a simple priority junction. Beyond the site and that the overall impact of the development traffic will not have a material impact of the development traffic will not have a material impact of the development traffic would not be severe in terms of paragraph 109 of NPPF. Landscape and Visual Representations (LDA Design – Nicola Longland) The development strategy outlined in Figure 2 would not impact 	
	 The development strategy outlined in Figure 2 would not impact on the purpose of the Area of Local Separation between Sileby and Cossington and can deliver landscape and visual 	

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	 enhancements to the current situation. The site itself is currently an arable field with a hedgerow boundary along Cossington Road, an abrupt urban edge associated with Sileby to the north, gappy scrub vegetation along parts of the boundary adjacent to the Midland Main Line with trees associated with the tributary to the south of the site. A line of incongruous conifers provides the boundary to Derry's Nurseries. The site sits upon the west facing slope of the River Soar valley. The site rises from approximately 47m AOD (Above Ordnance Datum) in the south western corner of the site to approximately 57m AOD in the north-east. Existing development associated with Sileby sits upon the same rising topography found within the site. To the south of Sileby (and the site) is the village of Cossington. An Area of Local Separation (AoLS) has been designated by Charnwood Borough Council (CBC) which includes the site. The following analyses the purpose of an AoLS, the current function of the AoLS between Sileby and Cossington and whether the site contributes to the purposes of the AoLS. The AoLS is outlined within CBC Local Plan Issues & Options 2019 Draft Policy LP 19, Landscape, Countryside, Green Wedges and Areas of Local Separation and undeveloped character of Areas of Local Separation between the built-up areas of these settlements." Within the justification for AoLS prior to LP 19 itself, CBC clarify that the main purpose for the AoLS is 'preserving settlement identity based on landscape character, the visual appearance of the area and maintaining landscape connectivity [as well as preventing] coalescence". A review of the AoLS to Sileby and Cossington (ALS-D) was carried out in 2016' which identified that the AoLS has a 'Moderate' strength to preventing development that would 'result in merging or significant erosion of gap between neighbouring settlements'. This Moderate judgement is outlined within the criteria on p24 as new development tist outlined within the cr	

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	 development along Cossington Road'. Given that the wording of policy LP 19 indicates that so long as new development 'clearly maintains the physical separation' between built areas, the following briefly analyses the site and how it contributes to the physical separation between Sileby and Cossington in order to understand whether it can be released from the AoLS for development. 	
	 Referring to Figure 1 enclosed with this document, the following can be surmised as follows: Distance of Separation - At their closest point, the distance of separation between Sileby and Cossington is c. 200m which is measured from the southern-most property within Sileby and the northern-most property within Cossington, both found along Cossington Road. As the 2016 review of AoLS highlights, the main pressure from development that would coalesce the two settlements is by ribbon development along Cossington Road. It could be perceived that an element of this coalescence has already occurred with built form associated with Brook Farm and Derry's Nurseries found on the eastern edge of Cossington Road. As such, the greatest sensitivity for preserving separation is to the west of Cossington Road, not to the east where the site is located. Physical relationship between the settlements – Sileby is generally found located between Cossington Road in the west and the Midland Main Line in the east whereas Cossington's most easterly boundary is limited to the public footpath which meets Cossington Road and All Saints Church in the west of the village. Consequently, Sileby east of Cossington Road has a relationship within generally open, undeveloped land whereas to the west of Cossington Road, the two settlements are situated opposite each other. As such, the western fields of the AoLS are the most sensitive to new development that would reduce the distance between the two settlements and give the greatest risk to physical coalescence of the two settlements. Extent of settlements in proximity to AoLS – The existing extent of Sileby extends to the last property along Cossington Lane to the south and properties along Charles Street to the east adjacent to the Midland Main Line. By extrapolating these lines across the site, there is an area where development could be 	
	located that would not physically reduce the separation	

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	 between the two settlements. For completeness, the Sileby Neighbourhood Plan (SNP) (2019) has also been reviewed in relation to the AoLS. The SNP does not have a specific policy in relation to the AoLS, or indeed make reference to the AoLS within the document. However, in the preceding text to Policy G1 Limits to Development, it indicates that development beyond the limit 'would risk the loss of separation of hamlets and settlements to the detriment of the community and visual amenity of the Plan area'. My above initial analysis in relation to the AoLS indicates that SNP's concern with the loss of separation between settlements would not preclude development coming forward within the site as illustrated on Figure 1 and 2. 	
	 Having briefly analysed the site in relation to its contribution to the separation between Sileby and Cossington, we consider that new development can be located within the northern half of the site that would maintain the current physical separation between built up areas. In addition to this statement, the site can also look to reduce the current visual and landscape effects associated with the abrupt southern urban edge to Sileby through delivery of green space and associated tree planting to the south and eastern edge of the site, as illustrated on Figure 2. 	
	• This can be delivered in accordance with the guidelines to the Soar Valley Landscape Character Area, which the site is located in order to help 'conserve and enhance' the landscape as per the Landscape Strategy identified within Borough of Charnwood Landscape Character Assessment, July 2012.	
	• The Potential Development Strategy at Figure 2 sets out an illustrative development area to demonstrates how circa 160 dwellings could be accommodated within the Site. This area would provide a mix of houses that accords with the objectives of draft Policy LP6, in order to enable the Site to cater for a diverse housing market and mix and provide levels of affordability (30%) to seek to ensure the types of affordable homes provided best meet the needs of the community and ensure a Registered Provider can be successfully secured to	
	 manage the homes. In design terms the proposed allocation would make a positive contribution to Charnwood through responding to secure through the development local distinctiveness in providing 	

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	 attractive and functional places where people want to live and work. This may be established through design principles (and thus accord with the objectives of draft Policy LP2) to ensure the development: Will respect and enhance the character of the area, having regard to scale, mass, density, height, landscape, layout, materials within and around area; Protect the amenity of residents in the vicinity of Willow Way; will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; is visually attractive as a result of good architecture, layout and appropriate and effective landscaping; establishes or maintains a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, safe, welcoming and distinctive places to live, work and visit; optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and creates places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. Contributed to mitigating and adapting to the effects of climate change in accordance with draft Policy LP30; Provide appropriate opportunities to promote sustainable transport modes; and safe and suitable access to the site can be achieved for all users; Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and – so far as possible – to facilitating access to high quality public transport, with the design of the layout seeking to maximise the cathment area for public 	

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	 reduced mobility in relation to all modes of transport; Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; Allow for the efficient delivery of goods, and access by service and emergency vehicles; and Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. 	
	 A design guide and/or code could provide a framework for creating a distinctive place on the Site, delivering a consistent and high-quality standard of design but tailored to tallow a suitable degree of variety where this would be justified. Development would be proposed to be set back from the Sites eastern boundary where the rail line runs, with appropriate acoustic attenuation provided. The site currently does not currently provide any public access, but this is a matter that could be explored as the detailed principles of the development came forward and could be formalised as part of any future planning application. The site is contiguous with the southern and western n boundaries of the Limits to Development of Sileby on relatively unconstrained land that is the not the subject of any statutory or non-statutory designation that would prohibit its allocation and subsequent development for residential purposes. The Site is in single ownership and as such available, achievable and deliverable. 	
EDCLP/118 WDA Planning	 Site is identified on the attached plan – Land off Windmill Road and Moor Lane Loughborough to the east of the Grand Union Canal. This site forms part of a composition of parcels of land as shown. The south west and south east quadrants have been very positively redeveloped for housing following the removal of a long established scrap yard and associated handling area. These relatively high density schemes either side of the canal have proven to be popular and demonstrably successful in contributing to the Borough Council's high priority regeneration strategy for this important part of Loughborough's inner area. 	The Council acknowledges the submission of the site "Land Off Windmill Road and Moor Lane Loughborough to the East of the Grand Union Canal". The site will be added to the SHELAA, and will the site assessment work will inform the next stage of the draft local plan. The Council notes that the two parcels of land have been delivered, and it is just the north-east corner that remains undeveloped.

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	•	The north east quadrant offers further potential. Preliminary	
		consideration has been given to a scheme which incorporates	
		canal side housing, open space and landscaping which will	
		strengthen the green infrastructure in the area and potentially	
		some public parking to support the heritage and tourism value	
		of the Industrial Heritage Quarter.	
	٠	The optimum scheme will emerge from continuing the	
		established dialogue with key stakeholders and further	
		beneficial change in this area can be secured in short order.	
		The site has clear locational advantages and has the in-	
		principle support of the draft Local Plan's Development Strategy	
		and its Regeneration Strategy:	
		(i) Loughborough is the most important settlement in the	
		Strategy's hierarchy - the main economic and cultural	
		focus - where managed growth and the provision of a	
		range and choice of new homes is strongly supported.	
		(ii) "It is proposed that there is a particular focus on urban	
		intensification with new development focused within the	
		existing urban area and particularly the areas closest to the town centre."	
		(iii) the site is brownfield land, currently derelict and	
		neglected, within walking and cycling distance of the	
		compact town centre, railway station and a range of	
		services, jobs and facilities.	
		(iv) "our overall development strategy of urban	
		intensification and concentration aims to support the	
		vitality and viability of the existing centre.	
		(v) "we want to encourage people to live close to the urban	
		centres in the Borough to promote the future success of	
		these centres by boosting footfall and the local	
		economy"	
	٠	We believe therefore that this site should be added to draft	
		Policy LP3: Housing Sites where the Borough Council's	
		priorities are highlighted - to support the delivery of homes in	
		'urban areas; to provide a variety of house types and designs	
		(with an emphasis as in this case on 2 and 3 bedroom dwellings	
		- draft Policy LPG: Housing Mix) and to reinforce the vitality and	
		viability of the town centre.	
	•	The Borough Council's Regeneration Strategy which is	
		explained and supported at pp.87-89 of the draft Local Plan	
		(attached for ease) underpins draft Policy LP14: Regeneration	

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	 of Loughborough. The explanatory text and the Policy speak for themselves in defining the support for the prospective redevelopment of this site. It presents an opportunity for collaborative joint working in producing a positive regeneration scheme. Absence of a housing trajectory. For each site, evidence regarding deliverability must be compiled and informed assumptions must be made about when each site may come forward. The resulting trajectory will then indicate not only whether this collection of sites will meet the housing target that the Council is proposing to set within the plan period, but also whether the rate of delivery will meet the land supply requirements of the NPPF. In reviewing the distribution of housing allocations at the Service Centres, it is notable that there are significant variations in scale of growth proposed within different settlements. the Settlement Hierarchy Assessment does not appear to take into account the scale of both completed and committed 	OFFICER RESPONSE The Council acknowledges the additional information of the site "Land Off Cotes Road" (Reference: PSH321). The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan. The critique of the landscape, ecology, and accessibility information; along with the additional information provided will be considered as part of the next stage of site assessment. The development capacity of approximately 108 dwellings at 30 dph, is noted.
	 development that has already been secured in these locations. For example, it is notable in a recent appeal dismissal for a speculative development of 228 dwellings at Land off Barnards Drive, Sileby that the Borough Council opposed the proposal, partly in light of the scale of development already committed within the settlement. Notwithstanding, the Borough Council are intending to allocate a further 309 dwellings at Sileby, including the land dismissed at appeal at Barnards Drive. Barrow upon Soar does perform better than Sileby within the 	
	 Settlement Hierarchy Assessment, particular in view of it having a Secondary School. Draft Policy LP3 proposes the allocation of three sites, adjacent to the defined settlement boundary of Barrow upon Soar: HS52 84 Melton Road, HS53 Land south of Melton Road, and HS54 Land north of Melton Road. The Allocated Sites are anticipated to provide a total of 287 dwellings. Land off Cotes Road was assessed within the SHLAA with site reference PSH321. This land has not been proposed for allocation as part of Draft Policy LP3. The Council's reasoning for this decision is not clearly set out in the evidence base and as a result there is no explanation as to why the Allocated Sites 	
	were chosen instead of PSH321 or why PSH321 has not been proposed for allocation alongside the Allocated Sites.	

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	•	Table 6.4 of the SA contains the results of a site options assessment of all site options in Barrow upon Soar. The supporting text to this table states: <i>"Three sites to the east/north east of Barrow-upon- Soar have been allocated (PSH392, PSH391, PSH242) Other comparable site options that were discounted (PSH321, PSH280, PSH410) perform similarly overall compared to the sites proposed for allocation."</i>	
	•	It is not clear how this site selection process has been undertaken, particularly given the statement included in the SA that discounted sites "perform similarly overall" to those that have been allocated. No explanation has been provided to justify the selection of the Allocated Sites over those that have been discounted or to explain why it is necessary to discount sites in any event. It is not possible to conclude that the right sites have been allocated in the absence of this explanation of process or justification of allocation.	
	•	A review of detailed evidence base relating to the Allocated Sites and the discounted sites does not provide a clear explanation of the decision to discount PSH321.	
	•	Landscape: the landscape in which the Allocated Sites are located has a medium sensitivity to 2-3 storey residential development. The landscape of PSH321 has a low to medium sensitivity to the same type of residential development (Landscape Sensitivity of SHLAA Sites, March 2019). This is an important consideration in the site selection process and yet the Allocated Sites have been selected despite PSH321 being a preferable site in landscape terms. No explanation or reasoning is provided for this decision.	
	•	Ecology: PSH321 is the subject of Case Study B in Appendix 1 of the Ecological Appraisal Report, June 2019. The presence of a Local Wildlife Site on the site is highlighted and the impact of development is discussed. It is stated that smaller sites in the vicinity of PSH321 would have less of an impact upon ecological assets. However, it is also acknowledged in the concluding paragraphs to Case Study B that if larger scale development was considered that included the parcels that have more significant ecological constraints: <i>" it would be possible to balance the requirement for mitigation across the entire area, taking a strategic approach to ecological</i>	

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	sustainable allocation option for Barrow upon Soar.	
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		Detailed explanation of the decision to propose the allocation of the Allocated Sites over alternatives, such as PSH321 has not been provided as part of this consultation and sound conclusions can therefore not be drawn about whether the right sites are proposed for allocation. Given the details referred to above and the discrepancies in the scoring criteria referred to in the SA, the decision to allocate only the Allocated Sites is not justified and is not supported by the evidence base. Land off Cotes Road should either replace the Allocated Sites or be allocated alongside them because it represents a sustainable and available development option. The allocation of land in this location will provide greater flexibility in supply and the resulting increase in the 7% supply buffer will also increase the likelihood that the housing needs of the Borough are met in the plan period. Alongside this Consultation Response Form, Rosconn Strategic Land have submitted a SHELAA Proforma 2019. The Proforma contains details of a site that is part of the land previously assessed as site PSH321 (the "Site"). The Site provides an opportunity to provide a sustainable extension to Barrow upon Soar. As is detailed in the Proforma, there are no environmental, technical or legal constraints that prevent development of the Site. Instead, the development of the Site will deliver benefits such as an increase in flexibility of land supply and the ecological benefit referred to in the Ecological Appraisal Report. The Site is therefore a suitable, available and achievable site option. The conclusions of the new SHELAA are therefore anticipated to be consistent with those reached in relation to PSH321 in the SHLAA.	
EDCLP/100 Marrons on behalf of Hawker Business Park Limited	•	This representation is made on behalf of our client, Hawker Business Park Limited, in respect of their interests at Melton Road, Burton on the Wolds. This representation provides our view on the relevant questions raised in the consultation document, considers the evidence and policy set that leads to the proposed safeguarding of the Hawker Business Park and promotes the reuse of the site for residential commensurate with Classes O and P of The Town and Country Planning (General Permitted Development) (England) Order 2015. Pre-application advice has been sought for the re-development of the site (P/17/2492/2) and the Council has supported the	 The Council acknowledges the submission of "Land at Melton Road, Burton on the Wolds". The site will be included in the SHELAA, and will inform the next stage of the draft local plan. The critique of the Employment Land Review is noted. Draft Policy LP13 – Protecting Employment Sites, has been written to ensure that the borough maintains a range of employment sites and employment uses for the long term benefit of the area.

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CONSULTEE	 development of residential units on the site (letter dated 29 March 2018) and that "a key element to the proposal will be ensuring that a landscape and design-led approach to the site is progressed". Burton on the Wolds is identified as one of fourteen Other Settlements where a total of 945 homes will be directed between 2019 and 2036. Once commitments are accounted for the plan proposes land to accommodate 794 additional homes at Other Settlements. The Draft Local Plan proposes to meet employment needs through the provision of 154.88ha of employment land under Draft Policy LP12 Meeting Employment Needs. This comprises 77.88ha of allocated employment land and a 77ha extension to the Loughborough Science and Enterprise Park. Unsurprisingly, paragraph 6.18 of the Draft Local Plan acknowledges that existing commitments for employment land provide sufficient land, choice and flexibility in land supply to meet the evidenced need for 55.9ha of employment land over the plan period. Considering that the need comprises 45.9ha of need and a 10ha allowance for contingency the total land release at 154.88ha provides more than comfortably for meeting needs at a potential provision of 7 homes at Burton on the Wolds over the plan period 2019 to 2036 and seeks to safeguard 12.5ha of employment Land Review does not support the findings for the site as 'good quality' or the conclusion to safeguard. Taken together with the market evidence set out in this representation there is no justification for safeguarding the Hawker employment site. The Hawker Business Park can be reused for housing development under Classes 0 and P of The Town and Country Planning (General Permitted Development) (England) Order 2015. 	Should Hawker Business Park wish to seek alternative uses on the site, then an application would have to show it meets the criteria set out in Draft Policy LP13.
	 Allocating the site for homes would re-balance the strategy for homes and jobs at Burton on the Wolds to c.107 new homes 	
	and 8.5ha of employment land.	
	 Allowing the redevelopment of the Hawker Business Park for homes would support the reuse of a brownfield site, take a 	

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	 positive approach to identifying a suitable location for Burton on the Wolds to grow and thrive, and support local services and allow for aspirational development that responds to market signals and changing circumstances. By contrast, attempting to safeguard the site for employment uses does not meet the appropriate and justified tests of soundness on the basis of the Council's own evidence and presents difficulties to the strategy for balancing homes and jobs and as consequence is not consistent with national policy. Preventing the reuse of the site for housing will result in the reuse of the site under Classes O and P of The Town and Country Planning (General Permitted Development) (England) Order 2015 and present a barrier to the redevelopment of the site through a sensible master planned project. 	
EDCLP/99 Marrons on behalf of Nottingham Community Housing Association (NCHA)	 This representation is made on behalf of our client, Nottingham Community Housing Association (NCHA), in respect of their interests at Land at Homefield Road, Sileby. NCHA has identified a need for affordable housing in Sileby and has secured an option to develop this site as a 100% affordable scheme for 55 affordable homes. NCHA has already secured grant funding from Homes England and is in a position to deliver much needed affordable homes at Sileby to the benefit of the community with immediate effect. We are in the process of preparing a planning application which would enable the development to take place in the near term. Charnwood Borough Council has already provided preapplication advice and we are keen to promote the site through the Local Plan as well as secure planning permission at the earliest opportunity. The site has previously been submitted to the SHLAA process and recorded as PSH201 but now forms part of a larger area identified as PSH261: Land off Homefield Road, Sileby and included in the Strategic Housing Land Availability Assessment 2018 with potential for delivery in the 6-10 year period. Having regard to the time that has passed since 2018, we consider the site to be capable of contributing to the delivery of homes within the next five years. The site is located on the western edge of Sileby and accessed from Homefield Road which in turn provides access to Seagrave Road and the Sileby local centre to the south east. 	The Council acknowledges the additional information of the site "Land at Homefield Road, Sileby" (Reference: PSH201 and PSH261). The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan. The additional information on securing grant funding for 55 units within 5 years, is noted. The additional information on landscape and visual impact, the impact on the ALS, and access / highways and transport, is noted. This information will be considered as part of the next stage of site assessment work.

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	 The site is immediately adjacent to residential development to the north, Redlands primary school to the east and a railway cutting to the south and as such sits within a small pocket of countryside which penetrates this part of Sileby. However, the site is outside of the limits to development for Sileby and in the Countryside on the Draft Plan Policies Map. Although the land falls away to the north-west and south-east, giving this part of Sileby an elevated feel, site levels are consistent with existing development to the north and there are no landscape designations. The site is identified on the Draft Plan Policies Map as part of an area of local separation (ALS5 - Sileby/Barrow upon Soar). Notably, our clients have secured grant funding to enable the delivery of affordable units on the site and are well placed to deliver 55 units within 5 years. This 100% affordable homes scheme has the potential to make a significant contribution to meeting the Borough's affordable housing need. Particularly given it has been designed to provide a mix and type of homes in the context of the housing register which currently comprises of 523 households. We consider there is potential for a little over 10% of those people being able to find a home through the development of this scheme to be a substantial benefit of releasing the land. The 146/7 Public Right of Way runs east-west from the railway station to the south of Redlands Primary School and presents an opportunity as part of the master planning of the site to the station and the District Centre could also be considered as part of development proposals for this site. Even without such an upgraded route the distances and walking times to key services and facilities show the site to be highly accessible by sustainable travel: 0.2 miles and 5 minutes on foot to Redland Primary School and pre-school care provision 0.3 miles and 7 minutes on foot to the nearest convenience store 0.4 miles and 8 minutes o	

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	 recreation and community services and facilities 0.5 miles and 9 minutes on foot to the Riverside Pharmacy 0.6 miles and 12 minutes on foot to the Highgate Medical Centre miles and 19 minutes on foot to employment (at Seagrave and Barrow Road) 	
	 Whilst most of the existing population already rely on the bus or car to access services and facilities that are available, the community at the western end of Sileby are able to walk and that would equally be true for new residents should the land at Homefield Road be developed. Taking account of the distances and walking times above show, this would not be the case for potential allocations to the north, east and south of Sileby. The site and the surrounding landscape is not covered by any landscape quality designation at either a national or local level. Although landscape designations are not an exclusive indicator of quality, designated landscapes are commonly acknowledged as being of particular importance and sensitivity. The western edge of the site falls within the proposed Area of local Separation ALS5 – Sileby/Barrow on Soar under Draft 	
	 Policy LP19. The site is within the Soar Valley Character Area as defined by the Charnwood Landscape Character Assessment (2012). The report concludes that the strength of this landscape character Area is "moderate" and the landscape condition is also judged to be "moderate". The assessment notes that the Soar Valley "is the most urbanised area of Charnwood Borough, with Loughborough in the north, substantial settlements to both east and west sides of the river corridor, and the influence of Leicester City to the south". The report states that "villages are large and stretch along the higher ground either side of the valley". 	
	 Sileby, like many of the other villages, occupies the valley slopes above the lower lying floodplain of the river Soar. The existing built-up area of Sileby, adjacent to the site, is a typical case in point. Housing at Park Road and Homefield Road extends on the valley slopes between 60-85 AOD (Above Ordnance Datum). The site occupies land at 60m AOD, which would mean that new housing upon it would occupy a similar landform as the existing housing. The report notes that "Any 	

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	 new built form on the valley slopes should be assimilated into its surroundings by careful scale, layout, siting, and design, and the use of materials and associated landscaping". Design and mitigation measures can be developed to ensure that new housing is sensitively assimilated into the landscape and the built context within which the site is located. This can include, for example, the introduction of new woodland planting around the site perimeter to 'soften' and filter views of built development, and an appropriate design response with regards to layout, scale and materials. As previously noted the site is identified on the Draft Plan Policies Map as part of an area of local separation (Sileby/Barrow upon Soar (ALS5)). The Draft Plan indicates that their main purpose is preserving settlement identity, and they are based on landscape character, the visual appearance of the area and maintaining landscape connectivity. The Charnwood Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation as ALS-E. The Study also considered the 'purpose' of ALS-E and concluded it to be Moderate and recommended that extensions to the east and south be considered to ensure the wider integrity of the gap and strengthen its boundaries. The recommended boundary follows the backs of properties on Homefield Road and the field boundary further south. This results in the Area of Local Separation penetrating further east than the rear of properties on Homefield Road. The surrounding landscape is not considered to be 'out of the ordinary' in landscape terms, being neither distinctive nor special in its character. The site, which is not publicly accessible and forms two grazing fields, lies within the context of adjacent housing and the railway to the south. Development on the site would be observed within that context and would not be an uncharacteristic feature in this landscape and, in this regard, does not offer a strong contribution to the separation between	

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	 settlement edge provided by Homefield Road and does not penetrate into the countryside further west than that built form. In our view, the site has the capacity to absorb well-designed and wellplanned development through a master planning process which considers the layout, scale and design response to the landscape. Our considered view is that this site is well placed to be considered by the Council for an allocation in the Draft Local Plan. A concept layout has been produced for the development of the site (Appendix 1). Pre-application advice has been received from Charnwood Borough Council and the layout plan will be amended to address comments made, particularly in respect of scale and the positioning of dwellings, in respect of existing residential development and landscape, and also parking arrangements. Although these changes have yet to be made, the concept layout is included for reference and to provide an idea of our client's intentions to develop around 55 affordable homes and open space. The site is capable of being served by a safe and compliant access from Homefield Road. Whilst we do not anticipate any issues that cannot be mitigated, Transport Planning specialists would be appointed to develop the scheme proposals and independently consider the capacities of local junctions to accommodate a residual increase in trip generation, but also the suitability of the sustainable transport network to encourage walking, cycling and public transport journeys, along with a detailed highway safety analysis. We are aware that the local highway authority has previously been concerned about the impact of development in Sileby on the Strategic Road Network. The Leicestershire County Council response to the recent Gladman proposal (Reference P/18/0659/2) advised that the residual cumulative impacts of that development for 228 homes could be mitigated and were not considered severe in accordance with the National Planning Policy Framework 2018 (NPPF), subject t	

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Berrys on behalf of Moss Solicitors	 additional trip every 2.5 minutes and based on delivering comparable schemes in similar locations, is a very low level of trip generation and unlikely to result in severe detrimental impacts. Should the proposals result in unacceptable levels of congestion on local junctions, then suitable mitigation measures including measures to reduce car dependency and also local capacity enhancements shall be explored and agreed with local highways officers. The proximity of the site to the railway line has been considered and noise impacts from the railway are considered to be capable of being mitigated through appropriate design. To support this process a final a noise acoustic report and validation assessment could be undertaken with clear recommendations whose implementation could be the subject of a condition on any approval or the requirement for this activity could be required as part of any allocation policy. Overall, our view is that the site is well placed to contribute towards meeting the housing requirement for Charnwood and provide much needed affordable housing. The representation is made in support of the alteration of the Barrow upon Soar Limits to Development to include land at 83 ('Northfield') and 87 Cotes Road, Barrow upon Soar, Loughborough, Leicestershire (the subject land). It is not considered that the emerging Local Plan is legally compliant or sound, as explained below: Objection is raised to the Charnwood Borough Council's decision to exclude land at 83 ('Northfield') and 87 Cotes Road, Barrow upon Soar (the subject land) from the village Limits to Development. Land identified edged red on the attached supporting Site Location Plan (drawing ref. KA34731-001). The site is an edge-of-settlement location to the west of Cotes Road, which abuts the main built-up framework of Barrow upon Soar at the western edge of the village. The site comprises two detached dwellings (nos. 83 'Northfield' and 87 Cotes Road), an outbuilding and ex	The Council acknowledges the additional information for the site "Land at 83 ('Northfield') and 87 Cotes Road, Barrow upon Soar" (Reference: PSH321). The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan. Development capacity of approximately 90 homes, is noted.

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	 accommodate a reasonable quantum of growth, including additional housing/mixed use given that it is a reasonably sustainable settlement with primary schools, secondary school, retail and leisure offer, public houses, restaurant/cafes, churches and other rural-based amenities and services. The land has no physical or legal constraints to redevelopment of the site, and there are therefore no factors which would hinder the suitability, achievability or delivery of sustainable housing at this location. The development of the site would visually complement the existing housing along Cotes Road/Blake Close. Access will be taken from the existing access point along Cotes Road to no. 87. If necessary, the access will be upgraded to serve a residential/mixed use development within the site, and can be enhanced to sufficient width and provide adequate visibility splays in both directions along Cotes Road. As noted above, it is considered that the site could reasonably be expected to deliver approximately 90 homes across its entirety. Using a standard density methodology of 30 dwellings per hectare, it is acknowledged that the site is capable of delivering a greater number of dwellings than suggested. However, the site's location and function as an edge of settlement location means that it is unlikely that the entire site is acceptable for development. To ensure a sustainable and well-designed development scheme, areas of land within the site will be given over to strategic and localised landscaping, screening, sustainable drainage schemes and access infrastructure (including roads/street layout, and provision of walking and cycling opportunities). In the circumstances, it is considered that the subject land could realistically provide approximately 90 dwellings. 	
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	We have reviewed the sites allocated for development against the sustainability appraisal including the site assessments at Appendix F and also the summary of site appraisal findings in Section of the SA report. From this review it is apparent that in many cases there was little to choose between sites allocated and some of those which were not allocated. It is also apparent that more sites will need to be allocated to meet some of Leicester City's unmet needs by allocating more sites on the edge of Leicester/within/adjoining	The Council acknowledges the additional information for the site "Land to the West of Gorse Hill" (Reference: PSH2). The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan. The Council is aware of L.City's unmet housing figure. The Council will
	Service centres close to the Leicester Urban Area for the reasons	be analysing the detail which sits behind the headline figure to ensure

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	already stated Cawrey Limited has promoted land to the west of Gorse Hill through the Call for Sites (SHLAA) process (Site ref S123/SHLAA Ref PSH2). This site extends to 4.5 ha and has capacity for around 90 dwellings. The site has also been subject to a pre application submission (dated 29 th May 2018); a response was received on 01 October 2018 (Ref P/18/1131/2). Cawrey Ltd wishes to continue to promote this site through the Local Plan process as we consider that it satisfies all the locational requirements of Draft Policy LP1 Development Strategy - it is located on the edge of the built up area of Leicester. A copy of the location plan and an indicative layout is attached to this representation. Specifically we note that the site has been removed from the Green Wedge as the review concluded that the site does not meet any of the objectives for including it in the Green Wedge. Secondly the pre application response (written before the draft Plan was published) noted that notwithstanding planning policy considerations (ie location in Green Wedge) that 'there do not appear to be any insurmountable technical matters associated with this proposal'. This response is consistent with the conclusion of the 2017 SHLAA which stated: 'Suitable location for development in terms of its walkable connectivity to Anstey and Beaumont Leys. There are no known irresolvable physical/environmental constraints preventing development, the site is in a suitable location for development adjacent to a service centre and a suitable access can be achieved.' Thirdly, it compares favourably with other sites which have been allocated when assessed against the sustainability framework. The analysis which assessed the site against other sites within the Anstey/Glenfield area showed that the site was of low-medium sensitivity having regard to the key environmental factors. It scored 2 greens (ie low sensitivity). It did not score any medium-high or any high sensitivity rating. Moreover it is a similar location to two nearby sites along Gy	that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground.

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DCLP/339 Sturdee Poultry Farms Ltd (Mr John Wheeler)	 site can be accessed off Gorse Hill; surface water drainage can be addressed through the provision of SUDS attenuation ponds located on the low lying land between the A46 and residential development; and with regards to foul drainage the site will drain to adopted foul sewers which connect to MH6202 in Castle Hill Park to the north of the site. Fifthly, we note that only sites with a total capacity of 1,567 new homes have been allocated in the Leicester Urban Area (site refs HS1 to HS16), when the draft Plan indicates that at least 2,000 additional homes will need to be allocated (this excludes any additional requirements to meet Leicester City's unmet needs). Thus we were somewhat surprised that the site has not been taken forward as a draft allocation. We therefore urge Charnwood Borough Council to review its allocations and to allocate this deliverable site for a housing development of approximately 90 dwelling units. There are 14 Other Settlements but 80% of the dwellings allocated to these settlements is allocated to just 5 villages. Even within the 5 Other Settlements that are to receive growth, there is further concentration, with 2 settlements (East Goscote and Queniborough) receiving 47% of the allocations. This leaves only 160 dwellings to be allocated through neighbourhood plans in the remaining 9 Other Settlements (assuming there are no neighbourhood plan allocations in those 5 that are receiving local plan allocations). The concentration of housing allocations in such a small number of Other Settlements have experienced very little growth. For example, in Burton on the Wolds, between 2011-2018, only two new homes have been built and 11 houses had planning permission (source - The Wolds Neighbourhood Plan Submission Version). We consider that land at the Sturdee Poultry Farm (SHELAA site ref; PSH182) should be allocated for approximately 60 dwellings. 	The Council acknowledges the additional information for the site: Land at the Sturdee Poultry Farm (SHELAA site ref; PSH182). The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan. The development capacity of 60 dwellings, is noted.

RESPONSE NO/		REPRESENTATION SUMMARY	OFFICER RESPONSE
CONSULTEE EDCLP/271 Lichfields on behalf of St Philips	•	 St Philips welcomes the Council's preferred option to allocate development to Barrow Upon Soar which is consistent with the preferred development strategy. However, concern exists that draft allocations HS53 Land south of Melton Road (SHLAA Site PSH391) and HS54 Land north of Melton Road (SHLAA Site PSH392) are not the most sustainable options when assessed against the Council's evidence base. St Philips therefore strongly objects to Draft Policy LP3 and, on the basis of the Council's assessment of its evidence base, there is a risk the plan will fail to be based upon a credible assessment of alternatives and would therefore be unsound. St Philips is concerned that the scoring of identified sites through the Council's evidence base documents is flawed in several areas and that this has resulted in an inaccurate position against which the site selection has taken place. It is considered that the land at Cotes Road, and the associated proposals, represents a suitable and deliverable alternative which would be better placed to deliver growth and achieve the sustainable development of housing, without resulting in significant harm to the landscape. Conversely, St Philips considers that such harm would emerge, based upon the Council's Landscape Assessment should the Council choose to proceed with other current draft allocations. The alternative development sites at Cotes Road are proposed as two options: 1. Site PSH321 – As a wider site (c. 9.24ha) which incorporates PSH280, this could deliver up to 340 dwellings and would deliver the necessary amount of housing apportioned to Barrow Upon Soar. An Independent Site Assessment setting out the site proposal can be found at Appendix 2. A concept masterplan can be found below. Figure 3.1 Site PSH320 – As a smaller site (c. 3.34ha), this could deliver up to 40 dwellings and could be delivered within the first five years of the plan period. A Vision Document setting out the site proposal can be found at Appendix 2. A concept masterplan c	The Council acknowledges the additional information for site: "Land at Cotes Road, Barrow upon Soar". The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan. The Council notes the critique of draft allocations HS53 and HS54, along with the specific comparison with sites PSH280 and PSH321. The scoring in the landscape section of the SA, and the overall scoring in the SA will be reviewed as part of further site assessment work. Specific landscape and visual assessment work is being carried out, and fill be used to inform the next stage of the draft local plan/ The alternative development sites at Cotes Road are noted as: Site PSH321 – As a wider site (c. 9.24ha) which incorporates PSH280, which could deliver up to 340 dwellings. And, Site PSH280 – a smaller site (c. 3.34ha), this could deliver up to 40 dwellings and could be delivered within the first five years of the plan period.

RESPONSE NO/ CONSULTEE		REPRESENTATION SUMM	IARY				ESPONSE	
	•	In order to demonstrate the suitability of s PSH321 and the inappropriateness of site 392, we have compared the findings of the documents. This comparison is supplemented by an In Assessment which can be found at Appen	91 and P idence ba ent Site					
	•	 A comparison of the landscape sensitivity scores between St Phillips' sites (PSH280 and PSH321), versus the proposed allocation sites (PSH391 and PSH 392), as scored in the Landscape Sensitivity Assessment, can be found below. 						
		Criteria	PSH280 & PSH321	PSH391 & PSH392				
		Physical character (incl. topography and scale)	L-M	м				
		Natural character	м	L-M				
		Historic landscape character	L	L-M				
		Form, density, identity and setting of existing settlement/development	L-M	м				
		Views and visual character including skylines	L-M	м				
		Access and recreation	L-M	м				
		Perceptual and experiential qualities	L-M	м				
		Overall assessment (development scenario of 2-3 storey residential L-M M						
	•	allocations PSH391 and PSH 392 score notably worse in comparison to sites PSH280 and PSH321.						

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CONSULTEE	 REPRESENTATION SUMMARY gateway location. The sites are also classified as being within areas of moderate sensitivity. Development would permanently change the character of the urban fringes in this location, and even with high quality design, there are likely to be residual minor negative effects.' (Our emphasis added) (paragraph 7.2.32) On this basis, the continued inclusion of Draft Allocations HS53 (PSH 391) and HS54 (PSH392) would result in the Draft Local Plan being unjustified, as it would not be based upon the reasonable consideration of alternative options to meet the needs of the Borough, taking into account available evidence, thus conflicting with the tests of soundness. Consequently, St Philips considers that the draft allocations off Melton Road should be included as a strategic allocation to deliver around 340 dwellings. Charnwood Local Plan Sustainability Appraisal: Spatial Strategy – Second Interim SA Report, October 2019. A series of sustainability credentials were appraised for each site and given scores. The performance of PSH280 and PSH321 as scored in the Sustainability Appraisal can be found below. 	OFFICER RESPONSE
	Table 3.5 Sustainability Appraisal scoring for PSH280 and PSH321 Image: Second and Second	
	 In terms of the site's strengths, it is predicted that the sites at 	

• However, St Philips considers that PSH280 has been

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 incorrectly scored in its assessment of proximity to the primary school; the criteria in assessing this SA objective states that a Neutral Effect should be afforded where the site is between 800-1200m to a primary school. As shown on the Local Facilities and Movement Plan in the Independent Site Assessment, the site is within 800-1200m of the local primary school and should therefore be scored accordingly with a Neutral Effect. Equally, PSH321 has been incorrectly scored in its assessment of access to health care; the criteria in assessing this SA objective states that a Minor Positive Effect should be afforded where the site is within 800m walking/cycling distance to a GP or health centre. As shown on the Local Facilities and Movement Plan in the Independent Site Assessment, the site is within 800m of the local health centre and should therefore be scored accordingly with a Minor Positive Effect. In terms of ecology, both PSH280 and PSH321 are appraised through a detailed site narrative assessment at Appendix 1 of the Ecological Assessment Report. The presence of Local Wildlife Sites adjacent to PSH280 and on-site at PSH321 is highlighted and the impact of development is discussed. Importantly, it is recognised that if development was to emerge south of Cotes Road, then considerably less harm to the Local Wildlife Sites would arise through wider-scale comprehensive development as opposed to piecemeal isolated development: 'On the other hand if all six adjacent parcels were considered as a whole it would be possible to balance the requirement for mitigation across the entire area, taking a strategic approach to ecological mitigation potentially result a net gain and enhancement of the local ecological network (eg. by uniting two previously separate LWSs) whilst achieving a relatively larger quantum of development.' (page 44) Given this clear recommendation, St Philips consider that the scoring for both PSH280 and PSH321 in respect to biodiversity/ecology should be in	

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RESPONSE NO/ CONSULTEE		REPRESENTATION SUMMARY	OFFICER RESPONSE
	•	 400m of Bus Route 27 and within 800-1200m of Bus Route 2, as shown on the Local Facilities and Movement Plan in the Independent Site Assessment. The site should therefore be scored accordingly with a Minor Positive Effect. The performance of PSH391 and PSH392 as scored in the Sustainability Appraisal can be found below. The scoring for sites PSH280 and PSH321, as previously depicted, has been repeated for ease of comparison. 	
		Table 3.6 Sustainability Appraisal scoring for PSH391 and PSH392, and comparison scoring	
		PATHS Landscape Biodiversity Water pollution Water quality: Nitrates Flood risk Land and soil Air quality Transport Transport Mind energy Historic environment Regeneration Local green space Access to health care Housing Employment Land Proximity to key routes Primary school Secondary school Convenience store Leisure Minerals	
		PSH280 PS	
		PSH321 PSH321 PSH391 PS	
		PSH392	
	•	Clearly, the draft allocation sites do not perform as strongly as PSH280 and PSH321 particularly in relation to landscape, proximity to the secondary school, proximity to convenience stores and leisure facilities.	
	•	The land at Melton Road scores Moderate in the Landscape Sensitivity Assessment and does not offer strong credentials in terms of access to services. Crucially, the inclusion of PSH391 and PSH392 as draft allocations therefore conflicts with Draft Policy LP1 (Development Strategy) which primarily seeks to ensure that 'the most environmentally sensitive areas will be	
	•	protected' and that sustainable development will be supported. Meanwhile, the land at Cotes Road scores Low-moderate in the Landscape Sensitivity Assessment and offers strong credentials in access to services and should therefore be favourably considered in line with Draft Policy LP1.	
	•	On this basis, the continued inclusion of Draft Allocations HS53 (PSH 391) and HS54 (PSH392) would result in the Draft Local Plan being unjustified, as it would not be based upon the	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCI P/274	 reasonable consideration of alternative options to meet the needs of the Borough, taking into account available evidence, thus conflicting with the tests of soundness. Consequently, St Philips considers that the draft allocations off Melton Road should be deleted from the Draft Local Plan. The land at Cotes Road should be included as a strategic allocation to deliver around 340 dwellings. 	The Council acknowledges the submission of the site: "Land at Halstead
EDCLP/274 Avisons obo Jelsons	 Jelson has a number of sites within the Service Centres (Mountsorrel) and the Other Settlements (Rearsby and Burton on the Wolds) that it believes are capable of being allocated in the Plan. The Authority will be aware that the sites at Burton on the Wolds and Rearsby have previously been put forward for consideration in the Council's SHLAA and both of also been subject of planning applications. However, Jelson has only very recently acquired the Mountsorrel site and are not aware that it has previously been out forward through the SHLAA. Land at Halstead Road, Mountsorrel Jelson is promoting approximately 2.4 hectares of land to the north of Halstead Road, on the western edge of Mountsorrel, for residential development. The site has not been put forward for development previously as Jelson has only recently acquired it. The site is therefore newly available. Jelson owns the whole site, including land required for access. There are no agricultural tenancies or other ownership restrictions. We conclude that the site is available for development now, thereby fulfilling this part of the NPPF deliverability test. The site is in a sustainable location, immediately adjacent to the built-up area of Mountsorrel. It is within walking distance of a range of amenities in the village including a primary school, doctors surgery, supermarket, library and leisure centre. The site has a total area of approximately 2.4 hectares and could provide in the order of 60 dwellings. The site is particularly well positioned as it could be developed without extending the village beyond its current extremities, i.e. the new built form would not go any further north or west than the existing settlement edges. The same cannot be said for any other potential development site around Mountsorrel. 	The Council acknowledges the submission of the site: "Land at Halstead Road, Mountsorrel". The site will be added to the SHELAA and will be considered as part of the site assessments that will inform the next stage of the draft local plan. The Council also acknowledges the additional information provided on the 17 th February 2020. Again, this analysis of the site constraints and opportunities will be included in the SHELAA (where appropriate).

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	 Indeed, the new Jelson site at Halstead Road is the only unconstrained land left for development in Mountsorrel. All other land around the settlement edge is constrained by 'areas of local separation' and public open space designations or access. Whilst the site is currently shown to have a 'countryside' designation on the draft Policy Map where there is a presumption against development, it is important to note that this designation is common to nearly all of the other greenfield sites that the Authority is proposing to allocate for housing development in the Plan. It ought not therefore preclude this site from being taken forward as an allocation in the next version of the Plan. The reality is that the development of the site would result in only minimal impact on the countryside or the overall character of the settlement. It is relatively featureless and enclosed in the landscape and as such it is poorly related to the wider countryside. As a consequence, there is no reason why this site shouldn't be suitable for allocation in the emerging Local Plan. Development of the site would have only limited impact on landscape value. The site is enclosed to the north by a landscaped embankment bordering the quarry. This protects the amenity of residents of Mountsorrel and it is a condition of the extant permission for the extraction of minerals that it must be retained. The site is enclosed to the west by a former railway embankment, and to the south and east by existing residential development. The wider landscape is constrained by rising ground and dense woodland to the west towards Swithland which reinforces the visually constrained landscape setting of the site. 	
	 Achievability / Deliverability Jelson has a longstanding reputation as one of the region's leading house builders. The development would be self-financing and would not require public subsidy. Jelson is confident that development of the site is viable and that a policy-compliant level of affordable homes could be provided. Jelson is currently developing the adjacent site for housing. There are already construction workers, plant and materials on the adjacent land. Working conditions (e.g. hours of work, 	

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EDCLP/274 Avisons obo Jelsons	 construction traffic routes etc.) have already been established. Consequently, development of the new site would not create any additional impacts on the amenity of nearby residents during the construction phase. The site could add to the Borough's housing supply quickly (within 5 years); with development starting soon after completion of the current Jelson scheme on the adjacent site. We conclude that development of the site is achievable with a realistic prospect that housing will be delivered on the site within five years, thereby fulfilling this part of the NPPF deliverability test. Jelson's team of technical consultants is currently undertaking investigations to identify the opportunities and constraints presented by the site. Jelson has prepared a 'Concept Sketch' to demonstrate how the site could be developed. This is provided at Appendix 2. The plan shows how a scheme of around 60 dwellings with an access via the existing Jelson development (Gilbert Road and Walters Close) could be delivered. Burton on the Wolds and Rearsby Paragraph 78 of the NPPF provides "that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities". It goes on to say that "planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." In the light of the above, the Authority's approach of restricting housing development within Burton on the Wolds and allocating only one site which would deliver only 47 dwellings in Rearsby over the Plan period, is very clearly contrary to the provisions of the NPPF and NPPG. Jelson has undertaken a range of technical and environmental analysis which confirms that the development of each site is demonstrably deliverable. Taking all of the above into account, Jelson is of the view that both Burton on the Wolds and Rearsby present sustainable locations for s	The Council acknowledges the additional information for sites within Barton on the Wolds and Rearsby. The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

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	• The ability of these settlements to support new development is clear from the recent delivery of housing on sites that were allowed at appeal.	
EDCLP/275 Define obo William Davis	Reliance on Neighbourhood Plans Despite Burton on the Wolds' suitability for accommodating residential development to meet the Borough's housing needs, the DLP fails to propose an allocation within the settlement. Rather, proposed DLP Policy LP3 states that 160 further dwellings from within Other Settlements are to be delivered at <i>"sites to be identified through neighbourhood planning process."</i> However, the Neighbourhood Planning process does not guarantee the provision of 160 dwellings in the plan period, and certainly gives no assurances of where this development will be, or even which of the 'Other Settlements' may accommodate it. Of those settlements considered to be 'Other Settlements', just three are in the process of preparing a Neighbourhood Plan; Wolds Villages (comprising the settlements of Burton on the Wolds, Cotes, Hoton and Prestwold), Queniborough and Rearsby. Currently, the DLP proposes to allocate 155 dwellings within Queniborough (HS71 and HS72). Meanwhile, the Queniborough Pre-Submission Neighbourhood Plan (October 2019) proposes to allocate Queniborough Lodge for the residential development of 132 dwellings through Policy Q11. However, the DLP proposes to allocate this site (Site Ref. HS11) within the settlement of Syston. Thus, the Queniborough Neighbourhood Plan effectively proposes no further allocations within the settlement in its current form. Meanwhile, the DLP proposes to allocate Land off Gaddesby Lane (HS73) for 47 dwellings within Rearsby. Whilst the Rearsby Neighbourhood Plan Submission Version (July 2017) identifies 'Convent' as a location of the site's potential capacity. Furthermore, the proposal is subject to land issues; with development conditional on the Conker Field being offered for public use to an appropriate adopting body. Furthermore, for the reasons set out below, the Wolds Villages	The Council acknowledges the additional information for Land South of Melton Road, Barton on the Wolds (Reference: PSH97). The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan. The additional information on the development capacity of the site (70 dwellings), as well as the evidence on suitability, availability, and achievability is noted. The figure for sites to be identified through the Neighbourhood Planning process stems from the preferred development strategy, which is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwellings to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

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	Submission Neighbourhood Plan (WSNP) offers no assurances that development will be supported within Burton on the Wolds. The WSNP is based upon a soon to be outdated local housing need figure, proposes constraining limits to development, and sets a Reserve Housing Site that is undeliverable and unsuitable (as expanded upon within the attached copy of WSNP representations submitted on behalf of WDL dated 30 th October 2019.	
	Thus, the dependence of the DLP on Neighbourhood Planning provides no guarantee that the remaining 160 dwellings will be delivered within the plan period. More specifically, the process does not assure development in Burton on the Wolds, a settlement that, for the reasons set out above, could both reasonably accommodate and benefit significantly from residential development. Thus, a reliance on the Neighbourhood Planning process could potentially miss an opportunity to enhance the already good baseline facilities of a settlement, through the development of Land South of Melton Road (SHLAA Site Ref. PSH97) providing up to 70 dwellings towards the Borough's housing supply, in order to meet the current and future needs as set out in response to Question 3 above.	
	Land South of Melton Road, Burton on the Wolds Evidently, the neighbourhood planning process offers no assurances regarding the delivery of 160 additional dwellings within Other Settlements; Queniborough's Neighbourhood Plan effectively proposes to allocate no further residential development beyond the DLP and Rearsby Neighbourhood Plan merely <i>identifies</i> a constrained site with an unknown capacity and no specific allocation policy. Given the constraints to development imposed by the proposed Limits to Development (under Policy WV13 of the WSNP) and the substantial risks to the deliverability of the Proposed Reserve Housing Site noted above, Land South of Melton Road offers an entirely suitable and deliverable opportunity to provide up to 70 dwellings towards this increased future requirement.	
	The delivery of up to 70 dwellings (including affordable dwellings) within a suitable settlement through the allocation of a site that is subject to a current Outline Planning Application (Ref.19/0041/2), which has already been subject to detailed scrutiny, would offer sufficient assurances that the remaining housing need of 160	

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	dwellings within Other Settlements will be met in part. Furthermore, the progression of the site, both through the Local Plan and through the currently undetermined Outline Planning Application (OPA), would ensure that up to 70 dwellings will immediately fall into the Borough's housing supply; providing a degree of flexibility to a housing supply that is reliant on large Sustainable Urban Extensions.	
	This site's unconstrained nature and public benefits are also evident, especially in comparison to Sturdee Poultry Farm, the WSNP's Housing Reserve Site. These benefits are outlined within the documents supporting the OPA and the attached updated Development Framework (Ref. DEF_185.003 H) demonstrates that the site can appropriately address the surrounding context.	
	Despite this, the WSNP incorrectly and negatively assesses the site's suitability for housing development.	
	In contrast to the transport constraints experienced by the Reserve Site, Land South of Melton Road benefits from the opportunity to create a direct vehicular and pedestrian access off Melton Road to the west of the existing allotments. The site also contains an existing footpath link to Melton Road, east of the allotments, and is within walking distance of the employment area to the north, namely the Wymeswold Industrial Estate, noted by an Inspector within a recent appeal (Ref. APP/X2410/W/17/3186714) as offering up to 400 jobs. The site is, therefore, appropriately located for housing development and has been included in the Borough Council's Strategic Housing Land Availability Assessment (SHLAA) 2017 as Site Ref. PSH97 (Field Adjacent 79 Melton Road, Burton on the Wolds). The SHLAA also confirms there are no constraints that would prevent its development for housing and notes the land is promoted by a developer.	
	Furthermore, environmental and technical assessments undertaken by WDL to support its promotion and the current OPA that is being considered by CBC conclude that the site is both suitable and deliverable. Notably, the supporting Landscape & Visual Impact Appraisal confirms that there are no views of particular value identified that should be retained or protected. Furthermore, in considering immediate views from Sowters Lane and more distant views from the countryside, the appraisal confirms that such views	

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	could be appropriately mitigated. The site is well connected to and compatible with surrounding uses and the wider settlement and, whilst it lies out of the constrained Limits to Development as proposed within the WSNP, the site's development would reinforce a more regular settlement pattern, whilst not setting a precedent for further development beyond its boundaries. Indeed, the submitted Development Framework clearly demonstrates the site's capacity to provide high quality public open space in conjunction with development (including childrens' play space, allotments and natural green space), all of which are connected by additional well-defined and safe pedestrian and cycle links to neighbouring areas. The site's unconstrained nature is also highlighted with regard to other considerations. Notably, it lies within Flood Zone 1 and is therefore at low risk of flooding, and surveys have confirmed no evidence of badgers, great crested newts or reptiles, and as such the site has negligible to low ecological significance. The OPA confirms the impact on ridge and furrow earthworks is considered to be of no more than local importance. Furthermore, the Noise & Odour Assessments submitted with the OPA to assess the impact of noise and odour from Sturdee Poultry Farm, confirms development to be acceptable in terms of its proximity and the ability to mitigate through the layout. This has been demonstrated through the attached updated Development Framework and confirmed by your Head of Regulatory Services Environmental Protection.	
	The supporting detailed assessments to the OPA comprehensively and robustly demonstrate that the site is unconstrained and entirely suitable for housing development, and that it is capable of creating a place with locally inspired or distinctive character of scale proposed within the current planning application. The public benefits of this development are also demonstrable. Given the current OPA, there is a clear commitment by WDL to bring forward the site immediately. Therefore, the development of the site would not only contribute towards the remaining 160 dwelling housing need within Other Settlements, but would also	

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	immediately provide up to 70 dwellings towards the Council's five year supply of deliverable housing.	
	Therefore, Land South of Melton Road represents an opportunity to deliver up to 70 dwellings within a high-quality scheme that optimises the use of an unconstrained site in a suitable location and would provide much needed market and affordable housing to meet identified needs. In doing so, the development would provide certainty with regard to the remaining 160 dwellings to be delivered through the Neighbourhood Planning process within Other Settlements, whilst also contributing to the supply of deliverable	
	housing to meet the Borough's housing need. This site should, therefore, also be allocated for development in the Local Plan Review.	
EDCLP/276 Pegasus obo Wilson	Draft Policy LP3 proposes the allocation of some 13 sites adjoining the Leicester Urban Area, involving a mix of brownfield and greenfield sites to provide a total of 1,567 dwellings. The proposed	The Council acknowledges the additional information for Land to the East of Thurcaston (Reference: PSH120).
Enterprises	allocations are directed towards the larger settlements of Birstall, Syston and Thurmaston.	The information will be considered as part of any update to the SHELAA and SA (where appropriate), and will inform the next stage of the draft local plan.
	Whilst the strategy to focus a large proportion of the required future housing growth towards the Leicester Urban Area is supported, it is considered that the Council should consider additional allocations in locations adjoining smaller settlements that are well related to the wider Leicester urban area.	The additional information on the development capacity of the site (620 dwellings), as well as the evidence on suitability, availability, and achievability is noted.
	Pegasus on behalf of Wilson Enterprises made submissions in relation to the opportunity to develop land to the east of Thurcaston to provide some 620 homes, along with a new primary school and areas of open space at earlier stages of the Local Plan process. A Vision Document was prepared outlining the opportunity for development and this is included as part of these representations.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	The Second Interim Sustainability Appraisal (SA) Report by AECOM assesses the land east of Thurcaston under site reference PSH120. Table 6.8 provides a summary of assessments for SHLAA sites at Thurcaston and Cropston. The land east of Thurcaston was appraised under broad options A5 and A6 relating to the low-growth scenario and B6 for the high growth scenario.	The decision-making on site selection is set out in Section 6.2 of the Second Interim Sustainability Appraisal (SA) Report. More specifically, paragraph 6.2.9 sets out how sites within "Other Settlements" were considered.
	The site is not proposed for allocation under Draft Policy LP 3. As outlined above, it is considered that the Council should	The Council is engaging with L.City on its emerging local plan, in the same way that L.City is a consultee on the Council's local plan. Ongoing discussions (with L.City and other strategic policy-making authorities) as

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	investigate the option of a higher growth scenario as a more appropriate balance between the socio-economic benefits of growth and the potential environmental impacts. It should also make provision for further flexibility in the plan through the allocation of additional sites.	part of the Duty to Co-operate will establish how to address cross- boundary and joint issues. Decisions on how to plan effectively will be formally confirmed through agreed Statements of Common Ground.
	In this context the Council should reconsider the allocation of land to the east of Thurcaston as a sustainable option to provide for further growth well related to the Leicester urban area. Reviewing the assessment of the option through the SA, concerns are highlighted in relation to potential impacts on separation between Thurcaston and the Broadnook development to the east, ecological impacts on the brook course, loss of agricultural land and a potential heritage impact on Mill House Farm Grade II listed building. The assessment notes however that the site is well connected to the Leicester Western bypass and has strong links with Leicester City Centre.	
	In terms of issues of separation, there is scope within the development proposals to incorporate areas of open land on the eastern part of the site to provide an area of separation that would offer improved informal recreation facilities for existing and future residents. The Vision Document shows that development could take place without encroaching on the Rothley Brook and therefore potential ecological impacts can be avoided. In terms of loss of agricultural land, there will need to be a loss of agricultural land to accommodate the scale of development required to meet future housing requirements over the plan period. In relation to potential heritage impacts, given the scale of the site, it will be possible to ensure that the proposals safeguard the setting of Mill House Farm.	
	It is notable that Leicester City Council in its recent presentation to members on the emerging new Local Plan, is proposing to allocate land south of Thurcaston within the City boundary as a site for development. This demonstrates the sustainability of this location and supports our assertion that the land east of Thurcaston should be considered for allocation through the Charnwood Local Plan.	
	The site should therefore be included as an allocation under Draft Policy LP 3 to provide additional housing well related to the Leicester Urban Area. The Vision Document outlines the potential opportunities on the site including the provision of new areas of	

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	open space for informal recreation and a new primary school.	
EDCLP/278 Savills obo Mr and Mrs Grainger	 Representation for "Land to the East of Rempstone Road, Hoton". 	The Council acknowledges the submission for Land to the East of Rempstone Road, Hoton.
	 These representations build on the Call for Sites submission which was submitted as part of the Council's Call for Site process earlier in 2019. This letter should be read in conjunction with the revised location plan, presenting a slightly larger site than was submitted in the previous Call for Sites. As such the site has been submitted as part of the SHELAA review 	The site will be added to the SHELAA and will be considered as part of the site assessments that will inform the next stage of the draft local plan. The additional information on the development capacity of the site (20-25 dwellings), as well as the evidence on suitability, availability, and
	Call for Sites running parallel to the Preferred Options consultation.	achievability is noted.
	• The thrust of these representations is to share the significant concerns we have over CBC's current strategy to restrict the growth in villages, stifling their future growth. It is therefore recommended that limited development within villages should come forward that represents a 'rounding off' of a settlement's	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the
	 core shape and form. The land lying to the east of Rempstone Road, Hoton represents an opportunity to deliver a high quality "infill" of circa 20-25 new dwellings within one of the villages of Charnwood at a scale commensurate with its rural location without harming 	fewest significant negative effects, and the greatest significant positive effects. The decision-making on site selection is set out in Section 6.2 of the
	 the core shape and form of the village. The site comprises 3.88 acres gross (1.57 hectares) of gently sloping, undeveloped grassland, situated to the north of the current village boundary of Hoton and as shown on the enclosed Location Plan. The site itself is made up of a total of 	Second Interim Sustainability Appraisal (SA) Report. More specifically, paragraph 6.2.9 sets out how sites within "Other Settlements" were considered.
	 four fields, all comprising grazing land. The site is situated immediately to the east of the A60, Rempstone Road and is adjacent to residential units to the north and south of its boundary. According to the 2004 policies map, the site abuts the 'Primarily Residential Area' of Hoton, and is situated within the village's Conservation Area but away from the buildings/ listed buildings deemed to form a significant 	
	 contribution to the character as part of the 2010 Conservation Area Appraisal. These buildings generally being located on Wymeswold Road and Loughborough Road. The site is located wholly within Flood Zone 1 (considered the lowest probability of flooding). There are no statutory ecological designations within 1km of the site which would impact on the ability the site to come forward. 	
	 In respect of highways, access is proposed to be off 	

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	 Rempstone Road. Initial comments from our highways consultant have confirmed that the land can be safely accessed without taking any third party ownership, possibly involving the introduction of a Traffic Regulation Order in order to extend the 30mph limit for the benefit of the village. There is also a potential access point off Hollytree Close, via an access strip which is within the same title. There are no wayleaves or easements crossing the site that would prevent the development of the land. The village of Hoton is predominantly residential and benefits from a village pub. The village of Wymeswold is situated approximately two miles east of the village and benefits from a range of pubs and leisure facilities, as well as a pharmacy, shops and a junior school. It is well connected by public transport with the no.9 bus stop located adjacent to the site on Rempstone Road, offering a 30 min frequency to Nottingham and Loughborough. The site has no planning history and is currently used as grazing land. Following Outline Planning 12/02070/HYBRID, the former Stanford Hall in East Leake has been redeveloped, as well as numerous buildings constructed on site to form the new Defence Medical Rehabilitation Centre. The Centre opened in late 2018 and has created a significant many jobs for the area. To this end there are expected pressures on housing need, in addition to the housing need of Hoton and growth required to ensure the long term sustainability of the settlement in its rural context. 	
DCLP/246 – Gladman obo various	 Representation for "Land at Six Hills, North of the B676 and West of the A46". Proposal for 3,000 homes in Charnwood, as part of total 9,000 home asheme (astrono Malten and Charnwood) 	The Council acknowledges the submission for Land at Six Hills. North of the B676 and West of the A46.
landowners	 home scheme (across Melton and Charnwood). Located in a strategic position on the existing transport network and lies approximately 7 miles west of Melton Mowbray and 8 	The site will be added to the SHELAA and will be considered as part of the site assessments that will inform the next stage of the draft local plan.

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	 miles east of Loughborough. Nottingham and Leicester are around 15 miles to the north and south respectively. The site is just 16 miles from East Midlands Airport. Potential building blocks for an exemplary scheme with a number of onsite assets to kick-start a new community readily available. These include the existing golf clubhouse and Race Hub alongside mature landscape features such as the trees on the golf course and existing lakes. There is a genuine desire to work with Melton Borough Council and Charnwood Borough Council to promote the delivery of Six Hills Garden Village through the local plan process of both respective authorities, with the support of the wider Leicestershire area. 	The additional information on the development capacity of the site (3,000 dwellings within Charnwood), as well as the evidence on suitability, availability, and achievability is noted. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
DCLP 266 Leicester City Council	 The City Council notes that Charnwood is consulting on development strategy and the principle of development at this stage, and that more detailed policies relating to site development will prepared at the next stage. As noted above, the City Council welcomes the decision to include headroom of 1,322 dwellings above Charnwood's minimum requirement of 5,930 dwellings over the plan period. The City Council notes from Charnwood's SHELAA Report (2018) that all sites, including those within the principal urban area, have been assessed at a standard density of 30 dwellings per hectare 	Noted – support is welcomed. The density figures noted are correct.
DCLP/260 National Forest Philip Metcalfe	This policy allocates 73 sites for housing development across the Borough. While the policy individually identifies a handful of these which are required to incorporate specific environmental enhancements, the remainder of the allocated sites are only expected to be 'carefully planned to avoid and then mitigate significant adverse effects on the environment'. No enhancement or expansion of the natural environment is required on these sites through this policy. While some allocations will be required under other policies to incorporate tree planting or National Forest planting for example, the NFC considers that Policy LP3 should be much stronger in ensuring that these allocated development sites contribute to the expansion and enhancement of the natural environment.	 The critique of Draft Policy LP3 is noted. The sites (and the policy wording) remain draft and are subject to further review. The sites and policy will be re-considered in light of these comments. It should be noted that Draft Policy LP19, LP20, LP22, and LP23 provide further requirements for the protection and enhancement of the natural environment.
	strategic interventions that would enhance natural capital, this	

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	Policy could then require all allocations to contribute towards the delivery of the Green Infrastructure Strategy through improving natural capital through each development. The Green Infrastructure Strategy would also provide an overarching vision for the natural environment through the plan period which would be delivered through the National Forest policy, tree planting policy, River Soar policy, specific requirements of allocated sites etc.	
EDCLP/252	The confirmation and identification of strategic sites as SUEs to	Noted – support is welcomed.
Leicestershire County Council Cabinet Report	deliver a significant proportion of the Borough's planned growth is welcomed as this will help secure the infrastructure investment required to deliver new homes and jobs.	The cumulative impact of development will be considered through the SA process; furthermore, relevant parts of the evidence base will also reflect on potential cumulative impacts, namely, the transport modelling work
	Outside of the proposed SUEs the scattered and relatively small- scale nature of the development locations around the Borough means that it will be especially important for the Local Plan to have strong policies around the identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives.	and the sustainable transport study. Both of these workstreams are being prepared in conjunction with LCC.
EDCLP/252 Leicestershire County Council	Birstall, Glenfield, Syston and Thurmaston are, in principle, potentially appropriate locations for growth in the district, given the range of facilities these locations provide; proximity to Leicester; and public transport provision.	Noted – the Council has considered these locations as part of defining a development strategy and has considered sites within these locations as part of the site assessment work (via the SHELAA).
	Specific proposals in these areas should be taken forward in a comprehensively master-planned approach, one that reflects any existing development proposals (including as relevant in neighbouring authorities) and other growth options with which this might interact, and that establishes the overall package of infrastructure measures (highways, transportation and otherwise)	
	required to enable the growth and the approach to delivery / funding.	
EDCLP/252 Leicestershire County Council	Draft Policy LP36 (North of Birstall Sustainable Urban Extension), refers to the Leicestershire Minerals Development Framework but this has now been replaced by the Leicestershire Minerals and Waste Local Plan up to 2031 which was formally adopted on the 25 September 2019. Regard should be given to the Mineral and Waste Safeguarding Charnwood Borough Document S2/2015 which forms part of the plan and lists the areas of the borough which are safeguarded for mineral purposes. Several of the allocations in the Draft Charnwood Local Plan lie in sand and gravel safeguarding areas and this should be considered. [Cabinet	Noted – the draft local plan will be updated to have regard to the Leicestershire Minerals and Waste Local Plan up to 2031, and the Mineral and Waste Safeguarding Charnwood Borough Document S2/2015
	report].	

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CONSULTEE EDCLP/252 Leicestershire County Council	Specific proposals within Loughborough should be taken forward in a comprehensively master planned approach, one that reflects any existing development proposals (including as relevant in neighbouring authorities) and other growth options with which this might interact, and that establishes the overall package of infrastructure measures (highways, transportation and otherwise) required to enable the growth and the approach to delivery / funding. Shepshed is, in principle, a potentially suitable location for growth in the district, given the range of facilities it provides; proximity to Loughborough and the M1; and public transport provision. Those parts of the settlement to the north of the A512 benefit most greatly from sustainable access to Shepshed District Centre. Of the relatively less urban/ more rural settlements in the district, Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley and Sileby are, in principle, potentially suitable locations for providing for some growth, given their range of facilities, that they are served by public transport and have good accessibility to services not available within the settlement.	The feedback on the settlement hierarchy is appreciated. The Council's evidence has been used to analyse the role and function of each of the settlements. Individual site assessment work has been used to understand the impact that development may have on these settlements. The Council welcomes the opportunity to work with LCC to consider impacts (including cumulative impacts) and agree mitigation for infrastructure that is within the control of LCC – namely: highways, public transport, education, and public health. The Council's preferred strategy is one of urban concentration and intensification, with 83% of planned growth focuses to the urban areas of Leicester, Loughborough, and Shepshed.
	 Piecemeal additions to relatively more rural settlements can provide challenges insofar as they can result in widespread cumulative impacts on infrastructure (highways, transportation or otherwise), but it is not possible for a particular site alone to mitigate those impacts. Thus, should the proposed draft local plan strategy be taken forward as envisaged; distributing significant levels of growth to these areas; any specific development proposals should be informed by a cumulative impact assessment for each settlement and by consideration of the approach to securing mitigation for such impacts. Of the relatively more rural settlements in the district, Cossington, East Goscote, Hathern, Queniborough and Rearsby are, in principle, potentially suitable locations for providing for some small-scale growth, given they only have some (not all) local facilities and that they have lower service levels of public transport. 	
EDCLP/252 Leicestershire County Council	Question 8 – good to see references in there around increasing biodiversity as this could be bottom of the pile in asks from any developer contributions.	Noted – biodiversity and protecting and enhancing the natural environment is a corporate priority. Draft Policy LP22 specifically details the measures the Council will put in place to conserve and enhance the natural environment.

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EDCLP/121 Marie Birkinshaw	5.7 and 5.9 are really key elements. Important to include a real link to nature and how to promote and increase species existence.	Noted – biodiversity and protecting and enhancing the natural environment is a corporate priority. Draft Policy LP22 specifically details the measures the Council will put in place to conserve and enhance the natural environment.
Q8 - LP3 - Housing		
Specific Sites - SU	f Leicester Sustainable Urban Extension	
EDCLP/221 Nick Baker Lichfields on behalf of CEG	 Instructed by CEG, the promoter of Thorpebury (formerly known as the North East of Leicester/Thurmaston Sustainable Urban Extension (SUE)) to submit representations. A hybrid planning permission for the Thorpebury development was granted by Charnwood Borough Council (CBC) on 4 August 2016 (P/13/2498/2). A planning permission for the element of the SUE which falls within Leicester City Council's (LCiC) administrative area (principally the Southern Access Road and associated landscaping) was granted at the same time. It is expected to be built out over a period of approximately 15 years and forms a significant element of the Council's spatial strategy to meet housing and other development needs in the Borough in both the current and emerging plan periods (to 2036). A discharge of condition application relating to the Site Wide Phasing Programme is currently before CBC for determination. The Council is also in receipt of four reserved matters applications submitted by CEG and its housebuilder delivery partners which together detail the first phase of the development. These applications are expected to be determined in January 2020. CEG accepts that the CLP should identify a range of sites to meet local housing needs. It is important that the selection, location and phasing of sites are required to make an appropriate contribution to the infrastructure costs associated with development. The delivery of larger and more complex sites, which are more sustainable and able to provide a wider range of supporting infrastructure and services, should not be prejudiced by the implementation of smaller sites. This must include seeking the manage the potential market impacts identified above. 	Support welcomed – The delivery and success of the Thorpebury (formerly known as the North East of Leicester/Thurmaston Sustainable Urban Extension (SUE)) is a corporate priority. The identification of further sites in the Leicester Urban Area is on the basis of critical analysis of the evidence base on housing need, the housing market, and the suitability/availability/achievability of sites. The Council expects the sites proposed for allocation, and the Thorpebury site, to be delivered in the forthcoming local plan period. A housing trajectory will be produced for the next draft of the local plan.

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	 Thorpebury, including HS6 (for 747 homes at Land South East of Syston), HS8 (for 157 homes at Land North of Barkby Road), HS9 (for 208 homes at Barkby Road), and HS16 (for 70 homes at Land off Barkby Thorpe Road Lane). We understand that the intention is to prepare detailed policies for each of these allocations at the next stage of the plan preparation process. Together these sites will introduce a significant further quantum of development on the edge of the Leicester Urban Area in addition to that which has already been committed in the area through the Thorpebury permission. Detailed policies and the trajectory for these new allocations should acknowledge the need for the timing of housing delivery to be programmed in a sustainable manner over the course of the plan period and ensure that additional infrastructure or impacts are fully met and mitigated by these developments. 	
EDCLP/192 Severn Trent Water	Severn Trent are aware of this development, previously it had been assessed that there was capacity for phase 1, however recent information indicates that the scale of development for phase 1 has changed and we are currently reviewing the impact of the revised changes to the phasing to ensure that we can promote any necessary upgrades at the right time.	Noted – the Council would welcome a discussion with STW to ensure infrastructure issues are fully understood.
DCLP-425-470 Environment Agency	The site area includes the flood zone 2 extents. Most development types are appropriate for this flood risk zone but must take into account the flood risk (1% to 0.1% annual exceedance probability). A flood risk assessment must be completed for all development within flood zone 2 and must consider the entire lifetime of the development. An ordinary watercourse is within or immediately adjacent to the site area and therefore consultation with Lead Local Flood Authority should be completed. If alterations or discharges are proposed to the watercourse a land drainage consent will be required."	A flood risk assessment will be prepared by the applicant as part of the reserved matters applications.
DCLP 266 Leicester City Council	Policy LP3 Site HS1 North East of Leicester Sustainable Urban Extension	Infrastructure and the delivery of the necessary transport improvement measures to support the Thorpebury development is a Corporate priority.
	The City Council continues to support the North East of Leicester Sustainable Urban Extension however this is conditional on a retained commitment to secure delivery of the full package of infrastructure needed to mitigate the development's impacts	The Council would welcome further discussion with LCC on transport (and other) infrastructure matters.
	Of particular importance in this respect is the transport	

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	infrastructure, including the strategic spine road through the development which is required to mitigate substantial impacts in the city.	
HS2		
DCLP 266 Leicester City Council	Policy LP3 Site HS2 North of Birstall Sustainable Urban Extension The City Council continues to support the North of Birstall Sustainable Urban Extension subject to appropriate education provision to minimise impacts on existing and planned education	Infrastructure and the delivery of the necessary infrastructure improvement measures to support the North of Birstall SUE is a Corporate priority. The Council would welcome further discussion with LCC infrastructure
	provision to minimise impacts on existing and planned education provision in the City.	matters.
HS3		
EDCLP/192	Severn Trent is aware of this growth, the proposed development	Noted – the council would welcome a discussion with STW to ensure
Severn Trent Water	will surround Shepshed WwTW. We are currently reviewing the impact on Shepshed WwTW, see Wastewater Treatment section below for more detail.	infrastructure issues are fully understood.
DCLP-425-470 Environment Agency	An ordinary watercourse is within or immediately adjacent to the site area and therefore consultation with Lead Local Flood Authority should be completed. If alterations or discharges are proposed to	Noted – the impacts on watercourses has been considered as part of the strategic site assessments and overall considerations for the site.
	the watercourse a land drainage consent will be required.	As and when detailed site assessments are carried out, the Council would expect direct liaison with the EA to ensure that satisfactory assessments are made, and any implications for watercourses are understood and impacts mitigated.
Q8 - LP3 - Housin Specific Sites – La	g Sites and South East of Syston	
HS6		
DCLP/306 Miss Yvonne Round	 this site is not a sustainable option as it will directly impact on residents quality of life. Including the right to privacy and the overall enjoyment of being at home. The majority of these are owned by the elderly many of who may be unable to object to these plans as the consultation 	The site selection process has been informed by a Sustainability Appraisal and landscape evidence. The masterplanning and development management process will consider the impact of developments on local amenity and loss of privacy.
	 is online or have the confidence that the large efforts involved in objecting will be listened too. Properties are very close to the boundary and would be directly impacted by any development built there. If two or 3 	The statement of consultation sets out how we have consulted local residents and stakeholders in Charnwood which has included consultation events.
	 storey they would blocking light and impact on privacy. negative impact on the value of these properties which have little to no rear garden as it stands, 	The layout of sites will be established at the masterplanning stage and will consider important matters such as loss of light and privacy.
	 concerns over losing their open countryside views. The impact of the time and disruption building on this land 	Impact on property values is not a planning matter.
	would take should also be considered as a significant detraction on the quality of life of those living in the area.	A loss of view is not a matter which can be protected through the planning system.

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	 Infrastructure in Syston is not able to cope with this number of proposed developments. Schools are oversubscribed, the roads are congested and the local health centre already has to cope with an influx of new patients due to the closure of the East Goscote Surgery. The community of Syston has already suffered from the estates built on Greetham Way, Saxby Drive and Linacre Crescent. Hundreds perhaps thousands of new properties built on fields without sufficient infrastructure put in place first degrading the lives of those living nearby. Reduce the development by at least 50%, if not more, of the proposed 747 dwellings. The site planning should include a large nature strip between any new development and the properties located on Goodes Avenue so that they can retain some quality of life. 	 The impact of the construction phase will be considered through the masterplanning and Development Management processes. Infrastructure including education, roads and healthcare is recognised as being vital to ensure sustainable development. We are preparing a number of pieces of evidence which will help us to identify the infrastructure requirements. We will also prepare an Infrastructure Delivery Plan. The need for new homes to be supported by appropriate infrastructure is noted. The Council is preparing an Infrastructure Development Plan to support the housing and employment allocations. A landscape assessment has indicated that 747 dwellings could be suitable for this site. Further work will be undertaken to understand the capacity of sites having regard to constraints.
LDCLP/23 Mrs C Kendall	 Concerns that any new properties would be built very close to the boundary of existing bungalows on Goodes Avenue meaning they would be overlooked and quality of life would be reduced. a green strip could be left between the new build and the existing dwellings this could be a flood defence as has been incorporated into other developments in the area. Then similar bungalows or at worst two storey houses on the other side of the green strip. Consultation has been largely online and responses expected by email which is difficult for elderly individuals who will mostly be affected by this site and who do not have access to the internet. Other issues are that the development of HS6 will be detrimental to the existing community, the green spaces currently enjoyed by existing residents. Syston will merge with Thurmaston and Leicester and will be lost in the urban sprawl. The local health services are at breaking point the maternity services in particular are under great strain. The local health 	Comment on nature strip is noted - landscape evidence will be reviewed and considered at the masterplanning stage. Concern over impact of new housing on existing dwellings is noted. The layout of housing developments will be established at the masterplanning stage and will consider important matters such as impact on light and loss of privacy. Comments are noted. The layout, design of housing and flood mitigation measures will be considered through the masterplanning and development management processes. The statement of consultation sets out how we have consulted local residents and stakeholders in Charnwood which has included consultation events. Impact of development on green spaces is noted. The site selection process has been informed by a Sustainability Appraisal and landscape evidence. The masterplanning process will consider green spaces in more detail. Loss of settlement identity is noted. The site selection process has been informed by a Sustainability Appraisal and landscape evidence. The

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	 centre can't cope with the existing numbers of residents. People often have to wait several weeks for an appointment. This can only get worse with more people living in the area. Developments on brown field sites would be far better than huge housing estates that charge the character of the whole area with all the villages and towns appearing the same just a mass of identical housing estates. 	 masterplanning process will consider settlement identity in more detail. Healthcare provision is recognised as vital infrastructure to ensure sustainable development. We will review healthcare capacity through further infrastructure evidence. Site selection has been informed by urban capacity evidence, SA and landscape evidence. Design of new developments will be reviewed through the masterplanning process.
LDCLP/26 Audrey Allen- Hoton	 residents to the south of Goodes Avenue are all elderly and all widows. Properties are all bungalows so, should two/three storey houses be built close to the bungalows we would be completely overlooked. Concerns that Syston, Thurmaston and Barkby will become an extension of Leicester and will result in loss of greenbelt. Concerns over capacity of sewage network, healthcare and schools. Discriminating against people who don't have a computer to air our views. d) 	Concerns noted. The masterplanning and development management process will consider the impact of developments on loss of light and loss of privacy. Concerns over coalescence noted. The site selection process has been informed by landscape evidence and SA. The provision of infrastructure is recognised as an important component of sustainable development. We will prepare further infrastructure evidence and continue to engage with Severn Trent, Leicestershire County Council and healthcare providers. Concerns noted. The statement of consultation sets out how we have consulted local residents in Charnwood.
LDCLP/22 Anonymous	 Concerns over increase in traffic cutting through Goodes Lane and increase in traffic on Barkby Thorpe Road. Syston will merge into Thurmaston which is already merged with Leicester Syston has been hit with more than its fair share of housing developments compared with other parts of the Borough 	Concerns over traffic noted. Site selection process has been informed by transport assessments and further transport modelling work will be undertaken through the local plan and development management processes. Concerns over coalescence noted. Site selection process is underpinned by landscape evidence and SA. Concern over the amount of housing in Syston is noted. The development strategy is supported by evidence including housing, transport, and landscape and sustainability appraisal. Further evidence will be undertaken as the local plan process progresses.
EDCLP/143 CPRE Leicestershire and its	 A masterplan, Green Infrastructure Strategy and Heritage Strategy should address jointly the impact of all three allocated sites (HS6, HS8 and HS9). Sites adjacent to the urbanised edge of the High 	The site selection process has been informed by landscape and ecological evidence. The cumulative impact of development will be considered through sustainability appraisal, the masterplanning and development management processes.

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Charnwood District Group	Leicestershire National Character Area. Sites are of some sensitivity which need careful treatment if they are to be developed.	
EDCLP/221 Nick Baker Lichfields on behalf of CEG	 All sites should be required to make an appropriate contribution to the infrastructure costs associated with development. The delivery of larger and more complex sites, should not be prejudiced by the implementation of smaller sites. It is noted that several housing sites have been allocated near Thorpebury, Together these sites will introduce a significant further quantum of development on the edge of the Leicester Urban Area in addition to that which has already been committed in the area through the Thorpebury permission. Detailed policies and the trajectory for these new allocations should acknowledge the need for the timing of housing delivery to be programmed in a sustainable manner over the course of the plan period and ensure that additional infrastructure or impacts are fully met and mitigated by these developments. 	Developer contributions to development proposals will be set out and managed through the development management process. Concerns over impact of delivery of smaller sites on Thorpebury noted. We will undertake delivery and viability evidence to inform the evidence base and the development strategy. We will undertake further transport evidence which will take account of the cumulative impact of development. The evidence and site selection process takes into account the Thorpebury SUE and also the cumulative impact of the south of Syston proposed allocations for example transport assessment, infrastructure studies, sustainability appraisal and viability assessment. The concern over timing of delivery of housing, infrastructure requirements and developments mitigating their impact is noted. We will undertake further infrastructure evidence and will produce a housing trajectory and an infrastructure schedule which will help the Council to monitor the delivery of new homes and infrastructure.
EDCLP/192 Severn Trent Water	 Please provide further information regarding certainty of development and the likely timescales to enable capacity improvements requirements to be reviewed in more detail and implement if required. 	This is a draft plan containing preferred options for housing allocations. As the plan progresses to pre-submission stage more evidence will be prepared including a housing trajectory and an infrastructure schedule which will provide more certainty. We will continue to engage with Severn Trent as the plan progresses.
DCLP-425-470 Environment Agency	• The Environment Agency has currently a project looking at the feasibility of multi-benefit interventions in the Barkby brook which runs through Syston. The Brook suffers from reduced water quality and biodiversity. Although the new development is not adjacent to the Brook the development could increase flood risk and reduce water quality. We would like development to contribute to improvement in the quality of the river, biodiversity and reduce flood risk. High quality and high functioning SuDS schemes could benefit the river downstream.	 The draft Local Plan is supported by evidence including a SFRA and landscape and ecology studies. We will undertake further flood risk evidence to assess the cumulative impact of developments. Contributions to mitigate the impact of developments will be identified and agreed through the development management process. The inclusion of SUDs will be considered through the masterplanning and development management processes.
DCLP-264 LCC - Education	 Syston Primary Schools A site of 2-3 ha would need to be reserved for a new Primary School to meet the 395 yield from the proposed 	Education is recognised an important element of sustainable development. We have continuing on-going discussions with LCC Education and will also undertake infrastructure evidence.

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	 developments unless it is possible to have additional land to extend existing schools. Planning 0.5 form extension to St Peter's & St Paul's which is for existing housing and demographic growth. The Merton could not be extended on its existing site. 	
	 Secondary (Wreake Valley or Roundhill Academy) Sufficient places at Wreake Valley however, developments for secondary places at Thorpebury (North East of Leicester) may have an effect. 	
EDCLP/256 John Weston	HS6, HS7, HS8, HS9, HS10, HS11, HS67, HS71 and HS72 - The housing allocations for Syston, Queniborough and East Goscote have all been refused this year	Comment on planning applications being refused noted. These sites have been identified as preferred housing allocations in the draft local plan however, the plan is still draft and any sites taken forward will need to be appropriately tested and assessed through the local plan process.
EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	• The allocation of HS6, Land south east of Syston, is supported. In addition to responses to questions, the respondent has submitted the following documents supporting their representation:	Support for the allocation is noted. Site location plan, opportunities and constraints plan, landscape and visual appraisal and access appraisal also submitted in support of draft allocation. Evidence will be reviewed in light of supporting studies.
	Site Location Plan Opportunities and Constraints Plan Landscape and Visual Appraisal Access Appraisal	The site selection process has been informed by a number of evidence studies including landscape and ecology. Supporting evidence will need to be considered during the masterplanning process.
	Geo Environmental Appraisal Air Quality Noise and Vibration	Comment is noted. Further detail on landscape and heritage matters will be identified through the masterplanning stage.
	 Opportunities and Constraints Plan identifies key influences which need to be taken into account by development proposals for the site including green infrastructure, heritage assets and the need to maintain separation between Syston, 	We are in on-going discussions with LLC Education about education needs for Syston. We will undertake infrastructure evidence will assess the education needs for Syston and inform the infrastructure delivery schedule.
	Barkby and Thurmaston as identified by draft Policy LP3, along with a number of additional features.	Comment on difference in site boundary noted. We will review the site boundary.
	 HS6 could build upon the identification of green corridors; reinstatement of historic hedgerows, strengthening/creating new boundary vegetation to the site and thereby softening the urban edge of Syston and its interface with the 	The presence of archaeological remains is noted and the landscape and heritage will be reviewed in light of the comments made.
	 Consider an area for the extension of The Merton Primary School. 	The potential for impact on Listed Buildings and several non-designated built heritage assets is noted and the evidence will be reviewed in light of the comments made.
	The potential developable area identified by the Opportunities 468	Comment is noted. The detailed design of the development will be

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RESPONSE NO/ CONSULTEE	 REPRESENTATION SUMMARY and Constraints Plan differs slightly from that included on the draft Proposal Maps, with the key difference being the north eastern most area of the proposed allocation. The Leicestershire & Rutland Historic Environment Record contains a number of records relating to archaeological remains within the site; Prehistoric cropmarks and other possible archaeological features, Geophysical survey confirmed the presence of probable Prehistoric features, comprising a group of ring ditches towards the western edge of the site, with a further large ring ditch and an oval enclosure Concerns over heritage assets which may be impacted upon by development within the site including one Grade I and eighteen Grade II listed buildings. Identified several non-designated built heritage assets which have the potential to be impacted upon by the proposed development of the site. The Opportunities and Constraints Plan demonstrates that an organic form to the edge of the built development can be delivered, softening the existing linear southern edge of the village and delivering public amenity open space in this location. The field boundary hedgerow defining the parish boundary remains and thus may be considered an 'important' hedgerow under the 1997 Hedgerow Regulations. the Proposed Development is likely to result in significant adverse effects upon the visual and sensory character of the site but with potential for mitigation in the form of open space and retention of views to the south. 	OFFICER RESPONSE established through the masterplanning and development management processes. Comment is noted. Evidence will be reviewed in light of comment. Comment is noted. The detailed design of the development will be established through the masterplanning and development management processes. Comment is noted. The detailed design of the development will be established through the masterplanning and development management processes. Comment is noted. The detailed design of the development will be established through the masterplanning and development management processes. Comment is noted. The detailed design of the development will be established through the masterplanning and development management processes. Comment is noted. The detailed design of the development management processes. Comment is noted access are noted. We will undertake further transport evidence to understand the impact of development. Detailed transport issues will be established through the masterplanning process.
	location.	
	village and delivering public amenity open space in this location.	
	remains and thus may be considered an 'important' hedgerow under the 1997 Hedgerow Regulations.	
	adverse effects upon the visual and sensory character of the site but with potential for mitigation in the form of open space	
	• The provision of public access within the green open space could lead to beneficial effects as recreational access is increased and connectivity between the settlement and the wider landscape improved.	
	• The retention of open space would minimise impacts upon the physical landscape, leading to only minor effects resulting from grading to accommodate the development, and provision of new SuDS features, which would offer the opportunity to enhance wetland habitats within the valley	
	 The effects on visual receptors could be mitigated in the long 	

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	 term by tree planting along the new settlement edge and the strategic open space, forming a strong landscape buffer to the Proposed Development. It is proposed that access to the site will be gained via existing access points on the site's northern boundary. The eastern most area will need to be accessed directly from Barkby Road. The location of this access point is constrained by other junctions located to the east and west. In terms of traffic impacts a range of development options in Syston was considered in the Mitigation Testing report of 	
	12th June 2019. That report confirms that growth in Syston performs very well in terms of overall impacts when considered with growth in other areas.	
EDCLP/252 Leicestershire County Council	Land south east of Syston - Two parcels (747 dwellings): Eastern parcel: Does not abut public highway although wider strategic landscaping/ open space within proposed allocations seems to abut C4301 Barkby Road. Western larger parcel: Abuts residential cul-de-sacs only - St Pauls Drive, Pine Drive and Cedar Drive. Potential question of suitability of existing roads to carry the additional traffic from a development of 500+ dwellings (Policy IN5). This will need to	Comments noted. Transport modelling has been undertaken to assess the potential impact of a number of different growth scenarios. Further transport modelling will be undertaken to assess and identify appropriate mitigation measures for a preferred development strategy. We will continue on-going discussions with LCC Highways.
DCLP/261 Edward Argar MP	 be reflected / considered in any transport assessment work. I would also express similar concerns about the proposed further increase in Syston on similar grounds. It would further eat away at the areas of separation between villages in the area, undermining their particular individual character, and running counter to other proposed policies in the Local Plan to protect the character of villages/ towns and maintain separation between settlements]. 	Comments are noted. The draft Local Plan is underpinned by evidence including a Green wedge and area of local separation review which also aims to protect settlement identity and prevent the coalescence of settlements. We will undertake infrastructure evidence to understand the infrastructure requirements for Syston.
	In each of these cases the scale of the proposed development would, I believe, risk significantly altering the character of the existing village of itself, as well as running the risk of eroding the separation and separate unique identities of the village. This is quite apart from broader concerns about the impact of additional pressures on local infrastructure arising from development of such a scale. While I believe overall in its thrust the Plan is a sound basis for future planning, I strongly believe that the above proposals are not the most appropriate way to proceed.	

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EDCLP/269	I had recently read the consultation on the Charnwood Local plan 2019-2036 and had a concern regarding the land east of Syston, labelled HS6. This is not the larger piece of land to the South of Syston, but the land to the east of Syston, south of HS8. [Redacted] we reside opposite a protected and endangered badger catchment area to the eastern border of our estate. From local knowledge of this land, I am questioning what possible access you could have to this land, since it does not appear to meet the Barkby road? [Redacted] Importantly - is there a draft timeline regarding any developments on this land? I understand the plans are 2019-2036. I would like to know so that I may be informed when to provide my objections and feedback to this small development.	Site selection process has been informed by landscape and ecological assessments to understand the issues associated with each site. We will review the evidence in light of the endangered badger catchment area. This is a draft Local Plan and more detail on delivery timescales and access arrangements will be provided through the masterplanning process.
Q8 - LP3 - Housin Specific Sites –H	ng Sites S33, HS34 (Nanpantan)	
HS33 HS34		
DCLP/69 Mr Garry Wills	 Significant concerns about HS33 and HS34, These additional houses will dramatically aggravate the traffic in the area, which is currently under huge pressure at peak times. Planning permission has already been refused for these areas based on the visual impact of the development. The noise for local residents will also be significant. Finally both of these areas sit within the Charnwood Forest at a time when to mitigate climate change we should be significantly expanding our forests not contracting them. Considering that these two areas comprise only 145 houses, just 2% of the additional housing required for Loughborough I am sure better locations could be found. 	The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Site selection was informed by transport, landscape/visual, and ecological evidence. The evidence will be reviewed in light of representation and previous planning refusal. Further transport evidence is being prepared to inform final development strategy.
DCLP/211 Miss Bally Shina	 Do not think that HS33 and HS34 are suitable sites, The area of woodland is excellent and form the 1600s and in the Doomsday book, deer and peasants roam in there. It is also of granite structure the rock and it cannot be built on. I think this would destroy the community in Tynedale and Leconfield. There are many retired people who live here who would also be affected considerably by the building work at the end of their lives. There is clearly more suitable sites. There is one house being built at the end of Leconfield by William Davis and it is taking 7 years, they don't seem to care about the people that live there and the community they are in. I think there we need to keep one of the last few green areas for people to use and maintain a decent standard of space for 	The geology of this site will be investigated and used to inform the assessment of the site.

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DCLP/222 Professor Roy Faulkner	 existing residents when lots of other larger sites such as those at Garendon and Shepshed would be easier to build on. This have the following effects: It will disturb the Loughborough skyline. It will destroy many Pre-Cambrian rocks which are unique to the NW Leicestershire area It will destroy natural habitats of great crested newts It will cause massive increases in local traffic by-passing Forest Road and linking in with the Priory The area has been designated as essential open space in the last two plans: there is no reason to change this, bearing in mind that the allocation of essential open space in this new plan is already below the minimum stipulated by local planning laws. 	 The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Site selection was informed by transport, landscape/visual, and ecological evidence. The evidence will be reviewed in light of representation and previous planning refusal. Further transport evidence is being prepared to inform final development strategy. The geology of this site will be investigated and used to inform the assessment of the site. In the Core Strategy, Site HS34 (Land rear of Snell's Nook Lane) is identified as part of the Loughborough Science and Enterprise Park. And,
DCLP/303 Mr Michael Charlesworth	 We are woefully short of open spaces in the Ward. The Council's own figures show that Nanpantan Ward has an existing provision of 2.45ha of Amenity Green Spaces, Parks and Gardens, a shortfall of more than 5ha. The Assessment Study also shows there is 8.43ha of Natural and Semi Natural Green Space in the Ward, a shortfall of more than 22ha. As we become surrounded by the University Science and Enterprise Park, developments on Snells Nook Lane and the 'hub' near junction 23, there are few open spaces left. If HS33 and HS34 are developed, there would be no opportunity now, or in the future, for the Council to meet its own open spaces targets. Charnwood Planning Office has acknowledged that building close to Burleigh Wood is not acceptable. HS34 has a long border with the wood, any transitional buffer will considerably reduce the area available for development and make the site far less attractive for developers. The effects on the biodiversity of the woodland due to loss of access to foraging areas, disruption caused by pets, as well as stray artificial light from cars, buildings and street lights suggest a deep buffer. 	Site HS33 falls within the urban boundary of Loughborough. The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Site selection was informed by transport, landscape/visual, biodiversity, and ecological evidence. The evidence will be reviewed in light of representation and previous planning refusal. Further transport evidence is being prepared to inform final development strategy. The geology of this site will be investigated and used to inform the assessment of the site. If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process.

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	 Burleigh Wood is of course managed by the University, who, in its consultation submission, is likely to recommend suitable transitional areas. We will just have to wait to see what it will recommend. With HS34, the increase in noise and pollution brought about by an additional 250 extra cars (estimating two for each of the planned 125 new houses) feeding on to Snells Nook Lane will further deteriorate the wellbeing of those living close to an already severely overloaded road and junction. For HS33, the good arguments are that it is built on Cambrian volcanic rock that the Council has signed up to 'celebrate' as well as the effect on the skyline that any development will bring due to the topography of the site. 	
DCLP/340 Dr David Mulvaney	 The Charnwood Local Plan (Core Strategy) allocates 77ha of land west of Loughborough University for an extension to the Science and Enterprise Park. The supporting text recognises that the extension to the Science Park is only allowed within this attractive landscape due to its outstanding economic advantage.' HS34 forms part of this land previously allocated for Science and Enterprise Park use and is now being reconsidered for housing development. Clearly, the statement in the Core Strategy that 'the extension to the Science Park is only allowed within this attractive landscape due to its outstanding economic advantage.' This previous justification cannot continue to be applied HS34 now its intended use has changed. What is now the justification for condoning a 'potentially significant impact on the surrounding landscape'? 	Site selection was informed by transport, landscape/visual, biodiversity, and ecological evidence. The evidence will be reviewed in light of representation and previous planning refusal. The Council will be reviewing the landscape sensitivity assessment of the sites.
LDCLP/05 Mr D Miller	 I am writing to complain and strongly protest at the inclusion of land off Leconfield Road HS33 and Snells Nook Lane HS34 which is included in the above for future residential development. HS33 is a small parcel of land which has been used by the loca community for over 30 plus years for walks to and through Burleigh Woods, my garden backs onto this field and I have enjoyed the wild life that frequently visit from the field, often seeing Hares, Foxes, Baggers and Deer, yes Deer often come from the Wood through the field in question to feed in our garden during Winter, the field is also used by many of the local 	 biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation

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	 children for recreation. Planning permission was refused to development this field in 1988 one of several reasons was the loss of privacy to nearby houses, which must still apply. Development of HS33 and HS34 would almost completely enclosed Burleigh Wood, given the already agreed plan for the university science park. HS33 overlooks Loughborough and beyond any development will have a detrimental effect on the skyline of much of the town as well as dominating local housing leading to a loss of privacy, if any development goes ahead then views from the town towards the outwoods forest would be ruined and lost forever. If the development of HS34 goes ahead then the increase of traffic entering Snells Nook Lane from the site would severely impact on the traffic flow and cause major congestion at the junction of the Priory public house. I am of the opinion that to include HS33 and HS34 in the draft local plan for future development would be detrimental to the residents of Nanpantan and the people of Loughborough. Finally planning permission was refused in 1988 for the development of HS33 and the reasons for refusal have not changed; only the traffic on the previously mentioned road and junction has increased drastically, any future development would make the situation intolerable. 	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
LDCLP/08 John & Mary Jerrams	 Concerns raised on: Burleigh Wood is part of the Charnwood Forest Area, a place of special interest for wild life and natural flora, certainly the bluebell display in the spring is amazing. Building work around the wood, apart from the noise and upheaval would damage the woods present natural environment. The original draft plan, already agreed, makes a clear line of boundary between Nanpantan and Loughborough, this development would break the aims of this plan. The increase in traffic, which will inevitably happen, should stop these plans at once. The delays already seen at the Nanpantan junction re already serious, and with the possible plans for the Wilson Bowden estate on Snells Nook Lane, this will be a major problem. Also there are already difficulties exiting the Holywel Estate now, especially at school times. We realise houses need to be built, and accept the Burleigh Wood 	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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	and the surrounding space need to be kept for our and future generations to enjoy.	
LDCLP/12 Richard Holdsworth	 Concerns raised on: Site refused planning permission in 1998 due to the high elevation of the land and the dominant effect any new properties would have on those already there in the surrounding area nothing has changed since 1988 and the reasons given then by the Council to refuse planning permission are still absolutely correct and relevant now in 2019. The refusal to give planning permission on 15th December 1988 for application number 88/2599/2 (Residential development to the rear of 49-57 Leconfield Road and 223-241 Nanpantan Road) states the following: 	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	"The site constitutes a portion of elevated land surrounded on three sides by existing developments and on the fourth side by Burleigh Wood, an ancient woodland of district level significance. The site lies on the border of the Charnwood Forest area of particular attractive landscape. It is strongly sloping in part and is formed of open pasture. 1. The Local Planning Authority are of the opinion that the site's elevation and open nature make an important contribution to the character of the area and that development of the site due to its undue prominence within the immediate locality and also from wider parts of the town, would be substantially detrimental to that character, thereby being detrimental to the visual amenity of the area. 2. A development on the site would be likely to dominate many of the dwellings in the vicinity of the site leading to loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the area. 3. The nearby junction of ThirImere Drive I Nanpantan Road, through which the bulk of the traffic flows from this site and the existing residential area off ThirImere Drive pass, is of insufficient capacity to cater for the additional traffic likely to be generated by this proposal, particularly in respect of congestion caused by traffic exiting from ThirImere Drive onto Nanpantan Road at peak periods. Additional traffic flows at	 Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment. Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work. The Council can confirm that the original landscape sensitivity assessment did assess the sites individually and the wording in the report is clear that the sites have distinguishing individual features, which have been considered. The report presents the two sites at the same merely for reporting purposes. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.

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	this junction would therefore cause delays to existing traffic at peak periods and would not be in the interests of highway safety unless improvements to the Thirlmere Drive/Nanpantan Road were undertaken to provide separate lanes for left and right turns out on Thirlmere Drive."	
	 Additional geological evidence for the area confirms the opinion that given the close proximity of the underlying Cambrian rock to the surface soil and the sloping nature of the land, allied to consequent problems of water run-off, any construction would need extensive drilling, which would create significant civil engineering difficulties for the area and any resultant properties constructed would be at an unprecedented and unacceptable height above any current building level. In addition, therefore, to the detrimental effects on residential privacy; the breaching of the horizon and extended views to the Forest for properties on Tynedale Road; the increased traffic and communication problems - all correctly outlined in your own Council's 1988 analysis above - the problems posed by the geological nature of the area make any residential development both unrealistic and potentially harmful. With regard to the proposals for HS34 to the west of Burleigh Wood, the environmental arguments against such a development are similarly extensive. Snells Nook Lane is already facing significant issues related to the volume of traffic flow from Nanpantan crossroads to the Ashby Road (A512), which will only be extensively exacerbated by the need to provide road access from any HS34 housing onto Snells Nook Lane. Burleigh Wood, a protected ancient wood and part of the Charnwood Forest area, would become isolated and fully enclosed by HS33 and HS34 to the detriment of access, wild life, conservation and the natural surroundings. I am sure other respondees, not least The Leicestershire and Rutland Wild Life Trust, will have provided numerous and more detailed arguments against damaging the distinct, unique and historic character of the wood and its related habitat but I cannot believe the Local Authority could reasonably countenance the potentially great damage to the wood, were adjacent residential development allowed to be progressed. In conclusion, I recall the Council's local plan f	

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	at the time of the refused 1988 planning application. The plans then published spoke specifically of the need "to cater for the ever rising demand for recreation and to create new areas of open spaces". The Council then reiterated its wish "to seek new woodland and tree planting to screen existing developments".	
LDCLP/13	I am writing to express my concerns of the above plan, my house	Prominence / Visual Impact - Site selection was informed by landscape
Mrs J W Miller	backs onto HS33 field any development on this site will completely dwarf my property given the height of the land also my view of Burleigh Wood will be blacked out completely and as the sun sets	and visual assessments, but will be reviewed in light of this representation
	over the wood my daylight will be severely reduced. Has anybody considered the affect that HS33 AND HS34 will have on traffic congestion at the junction off Snells Nook Lane and Nanpantan Road, this is already at a standstill right back to and pass the sports ground on Nanpantan Road. Also what affect will	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	these houses have on our schools, the nearest being Holywell, which is difficult to get our children in even if you live in the catchment area.	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	I have lived in my house since 1987 and my children used HS33 frequently for recreation and I think the next generation should use the same facility. Planning permission was refused then on several grounds and the same should apply today.	Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC.
LDCLP/33 Joan M Holdworth	I am responding to Question 8 in Section 5 (Housing). HS33 Regarding the sites' elevation and open nature nothing has changing since planning permission was refused in 1988. May	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	people still use the open area for leisure and exercise and it is an access to Burleigh Wood. Burleigh Wood is a protected ancient woodland that attracts significant wildlife and birds that many enjoy. The Cumbrian Rock just below the surface would still make building	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	difficult and any houses built would change the skyline and overlook existing properties. Since 1988 the number of cars exiting from Thirlmere Drive has increased and any extra cars using this entrance to and from	Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work.
	Nanpantan Road would obviously cause congestion and be a safety issue. Building houses on HS33 would inevitably increase the number of cars significantly HS34.	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	If a large number of houses were built here Burleigh Wood would become enclosed and this would obviously affect the wildlife. The traffic coming out on to Snells Nook Lane from that number of houses is bound to cause problems as traffic is already slow at	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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i a pl ex I e th	eak times. appreciate that houses have to be built but as there are already lans for this area, it is also essential to retain the open spaces and existing areas for recreation. encourage the Council to look at the 1988 decision and realise the decision the Council came to was correct and that it should efuse planning permission for HS33 and HS34 now.	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.
LDCLP/36 R Mrs Irene Chow II ch po th re O ar Fi a ta bu gr th w it w su a ta bu gr th w su a Ti th Sp fi th w su a ta bu gr th w su a ta bu gr th th re O ar Fi a a ta bu gr th th th th th th th th th th th th th	Re Question 8 on the Housing Plan have been a resident here in Loughborough and brought my hildren up here. I was disappointed to hear that there is a ossibility that the field at the end of my street could be developed, his was last discussed in 1988 and it was rejected and the same easons are still valid. On the council plan the field is labelled as HS33 and there is inother field behind it labelled HS34 which are closely linked. Firstly I think there is the possibility that the developer is related to house being built at the end of the road at Leconfield, this is aking many years to build and is a disruption to the residents. If uilding is allowed to happen here we will use up one of the last reen spaces in the area which people use for fitness and to take heir children to the Burleigh Wood which is very beautiful and we vould like to see maintained as in spring when the bluebells come its truly wonderful and any building work beside this ancient wood vould most likely cause significant damage to the wood and its urroundings. Additionally regarding HS34, the Draft Local Plan states that it will omply with the guidelines of the Charnwood Forest. Section 7.20 of the Draft Local Plan says it will support the objectives of the andscape Partnership Scheme' This Partnership Scheme states nat 'Charnwood Forest contains a high concentration of Sites of special Scientific Interest and Local Wildlife Sites, but these places iave become increasingly isolated by activities such as hedge emoval, ploughing of grasslands, development and road building'. The development of HS34 will isolate Burleigh Wood (and adjoining lolywell Wood) from the remainder of the Forest. Surely this is eason alone that Charnwood Borough Council should not allow IS34 to be included the Local Plan? As well, Nanpantan Ward is ordered by Nanpantan Road to the south and Snells Nook Lane uns through its western side. These roads and their junction are ften overwhelmed by vehicles at peak times. Soon to the north will e added the housing developme	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.

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	and Enterprise Park towards Snells Nook Lane and beyond. There have also been three housing developments along Snells Nook Lane in recent years. Surely HS33 and HS34 as the only Open Spaces we have left must remain to give the area some lungs to provide protection against all the additional pollution these developments will bring? Please consider my arguments for the residents that live here and the damage that could be caused to the environment and quality of life to those who live here.	
LDCLP/37 Mr G Goddard	I would like to have the opportunity to give my opinion on the recent draft plan that has been circulated on the Charnwood portal. I often frequent this part of Loughborough and use it for recreational walking and visiting the Burleigh Forest in spring and summer and I was very sad to hear that the areas here HS33 and HS34 are potential build sites for the local planning for the future. I think that there are more suitable areas in Shepshed and there is already an area in Garendon that has substantial plans already put forward. So if you could consider these areas as I think question 8 is best suited to be answered here in that there would be excess traffic, areas of natural beauty would be destroyed, there is an old farm house at Nanpantan that has old walls that would be destroyed if building was granted at HS33. Overall I think there is many more areas that can be developed which would not impact the environment. We often take the children to play in the wood and the field for dog walking and there is few green areas left and I am also advised that there would excess traffic in an area where there is a lot of retired people which would cause anxiety and stress for those at this stage in life.	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.
LDCLP/52 Stanley & Evaline Martin	Please reconsider including HS33 and HS34 in the local plan. Re Answer to Question 8 on the Charnwood Draft Plan My wife and I often come to Loughborough to visit our son and daughter in law and grandchildren every couple of months. We very much enjoy are trips but we were very sad to hear that where we stay when we visit is likely to be redeveloped and there is currently a substantial plan to build in the field at the end of Leconfield Road which is part of the Charnwood Draft Plan.	Noted – the sites have been proposed after detailed analysis through the SHLAA, SA, and previous consultation.
LDCLP/53 Julian & Suzanne Thompson	Re Question 8 on the Charnwood Draft Housing Plan We were very sad to hear of the building plans at the end of our street in Leconfield Road to build in the field at the end. We like this field which is used by the community as one of the last spaces	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.

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	in the area which is green and dog walkers alike also use this as families like ours and our 3 children. The Burleigh Forest is very beautiful and is rumored to be in the Doomsday Book and dates back many hundreds of years and our kids love playing in the forest and going for walks in spring and summer. HS33 and HS34 we feel would impact the area a lot in a bad way and destroy the community feel that exists and the users of the field which was made a right of way and common space many years ago. There is a huge build at Garendon for 3-4,000 houses and we think that this is sufficient for the area as these sites would have infrastructure in the area built specifically. HS33 and HS34 have already had some houses built of a large size which haven't been sold and are some 2 years behind schedule and caused a lot of inconvenience to residents. Additionally, there is large traffic jams on Nanpantan Road and Snells Nook Lane. We think that HS33 and HS34 should be removed from the Housing Plan and be formally designated green areas as they have had plans rejected in 1988.	 Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.
LDCLP/55 Mr & Mrs Edwards	We saw in a local newsletter that there is possibility that may happen to some fields off Snells Nook Lane and we would like to respond to Question 8 of the draft housing plan. We think that it is not a good idea to develop here as there is already significant development ongoing on the Garendon Estate, the ongoing development of the Loughborough University Science and Enterprise Park and further potential developments towards the M1 are continuing to bring substantial increases to the traffic along on Snells Nook Lane, particularly at peak times. According to the submission by Leicestershire Local Highway Authority regarding the proposed development of a hub to the west of Snells Nook Lane [25]. The Snells Nook Lane/Nanpantan Road junction already operates significantly over capacity. Due to the close proximity of existing properties to the roads at the junction of Snells Nook Lane and Nanpantan Road, substantial mitigation here does not appear to possible. The increase in noise and pollution brought about by an additional 250 extra cars (estimating two for each of the planned 125 new houses) feeding on to Snells Nook Lane will further deteriorate the wellbeing of those living close to an already severely overloaded road and junction. This makes it inappropriate to consider site HS34 any further and it should not appear in the Local Plan. We travel regularly in this area to work and the traffic is already horrendous on Snells Nook lane and further development	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment did assess the sites individually and the wording in the report is clear that the sites have distinguishing individual features, which have been considered. The report presents the two sites at the same

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	here would be excessive. We also think that there would significant landscape sensitivity that would need a proper assessment as the Landscape Sensitivity Assessment shows no pictures taken from or showing S33 and the comment on page 76 states that the site 'has low-moderate landscape sensitivity, as it is more closely associated with existing development and screened from the wider landscape by existing woodland'. This is incorrect. From most parts of HS33 there are wide and open views over much of Loughborough and across to the Wolds east of the town. No one who visits the site and correctly records their observations can possibly say that the field is 'screened from the wider landscape by existing woodland'. The Landscape Sensitivity Assessment of HS33 is clearly flawed and the only reasonable action at this stage is to remove HS33	 merely for reporting purposes. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.
LDCLP/59 Ramesh Patel	from the Draft Local Plan. We have read the Draft Charnwood housing plan and we would like to write about our response to question 8. We regularly walk in the Burleigh Wood and we were very sad to hear of the HS33 and HS34 proposals, this is an area of natural beauty and our grandchildren love walking in the field and woods here and this is one of the last green spaces in Loughborough. We have lived in Loughborough for some 30 years and have seen building happen everywhere and the wood is of very natural beauty with deer, pheasants and badgers who live here. If planning permission was granted this would spoil the forest as the children from Holywell school often walk in her as do school trips, University classes and visitors to the University with their parents. It is also part of the Fruit Trail a free program run by the Uni for local children. Further reasons are that excess traffic here is bad for the wildlife and we believe there is fossils which is clear from the British Geological Survey that there is hard Cambrian slate-like rocks' and is likely to 'lie immediately below the top soil which would make building impractical. Additionally the hill has a very high incline and it is likely to overshadow the houses behind it considerably. There is a 'self build' at the end of Leconfield which is half built and it already towers over the other houses, further development would make this worse for local residents and spoil the area of natural beauty. There is already a large amount of houses in excess of 3,000 planned at Garendon which has roads and facilities already planned in this build. Excess development at HS33 and HS34 would result in grid lock at Snells Nook Lane and Nanpanan Road	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment did assess the sites individually and the wording in the report is clear that the sites have distinguishing individual features, which have been considered. The report presents the two sites at the same merely for reporting purposes. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out.

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		Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform
		the assessment of the site.
LDCLP/60	Please don't build in HS33 field near my house, I play with my	The Council values access to green space and open space for
Ryan	brother and sister in summer.	recreation. This response will shape the further analysis of the site.
EDCLP/11 Mr M Cramer	Blocks HS 33 and HS 34, adjoining Burleigh Wood. One of the pleasures of walking in the wood is being in a protected space, at peace, and knowing that the other users of the wood feel the same, and that the birds and other animals are happy there, and if they want to leave or (re)enter, they can approach from many directions. Human beings have fewer options, which is as it should be. There is existing housing, but it falls away behind you, even if you turn left after you enter. (As it is, some additional pathways have been created in the direction of these houses, but fairly unobtrusive). If you enclose the wood on 3 sides, you increase the pressure on the wood, and you reduce the pleasure gained from looking outwards. I took my mother on walks to see the bluebells, and only at the last, when she couldn't accompany me that far, did I realise that her end was near. That doesn't stop me still walking around the wood, and I can walk there without having to get in my car, which is good for both me and the environment. I will not burden you with more on MY experiences of the wood, and there is no need for me to repeat all the reasons to be found elsewhere, but I hope that you can agree to leave this little wood in	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
EDCLP/12 Michael Cahill	 peace and its own privacy. I write to express an objection to that part of the Charnwood Local Draft Plan which relates to section HS33 land off Leconfield Road) You will be aware that permission was refused in 1988 to a request to build houses on the site and for good reasons. Nothing has changed in the past 30 years to warrant a different outcome in 2019/20. Any development would adversely affect the skyline. Houses in Leconfield and Tynedale would lose privacy. Traffic flow would be adversely affected. Any development will isolate Burleigh 	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	Wood from the main body of Charnwood Forest to the South. These are all cogent reasons why it would foolhardy to contemplate any kind of housing development on this important site.	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback

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		and information from this response will be included in the work.
EDCLP/13 Sharon Gray	I am responding to question 8 of the Draft Local Plan. In reference to housing site on Leconfield Road The reasons planning permission was refused in 1988 remain the same (ref: 88/25999/2). Any development would still affect the local skyline if it was a	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	problem then it is a problem now and are you seriously considering destroying an area of land that is part of Charnwood's unique geology? Surely, you know that the Cambrian rock foundation of HS33 is an area of geologically international importance and worth	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	saving. I would also like to comment on the Snells Nook planned housing	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
	at Nanpantan opposite the entrance to the Longcliffe Golf Club. If you propose to let Wilson Bowden build an enormous industrial site for B2 type industrial units on Snells Nook Lane please consider why would anyone want to live overlooking it, if it is left as agricultural land at least it is a buffer space between existing residential land and agreed science park and proposed Industrial Park. If the plans stay as they are, Nanpantan will become an industrial wasteland with cheap housing around it instead of the	Geology – The geology of this site will be investigated and used to inform the assessment of the site.
	picturesque entrance to Loughborough it is at present.	
EDCLP/19 Jill O'Mara	Question 8 Regarding HS33 Regarding the failed planning permission in both 1988 and 1999, the environment landscape hasn't changed in the preceding 30 years, so I don't see why it needs to be considered again. The road junction at Thirlmere Road and Nanpantan Road is very busy at different times of the day and the last thing this junction needs is a massive increase in traffic.	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
EDCLP/20	HS33	The Council values access to green space and open space for
James O'Mara	At the top of road (Leconfield Road) there is a family who, under the watchful eye of their father play ball games on the road. This is a sight for my old eyes, as this was the norm when, I was little, a year or two ago. If this new build goes ahead, the children and their dad will unfortunately have to find somewhere else to play. Speaking of children. We have just had a week of Children in need. What about what the children don't need. That lovely nursery on Nanpantan Road will be within earshot of the proposed new build. Surely pre school children do not need to be objected to the noises of these new houses being built. Not forgetting the poor unfortunate teachers trying to prepare these young children for school.	recreation. This response will shape the further analysis of the site. Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC.

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	The local primary school, Holywell is full, and there is a waiting list for new pupils. So where are any children of any future new homeowners, going to be schooled.	
EDCLP/21 Dr Ana Blanco Alvarez	 homeowners, going to be schooled. Reference: Draft Charnwood Local Plan 2019-36 – Response to Question 8 write in connection with the above Local Plan. I have examined Chapter 5: Housing and I wish to object strongly to the development of 25 houses in HS33 (land off Leconfield Road) and 120 houses in HS34 (land rear of Snell's Nook Lane). The reasons planning permission was refused in 1988 remain the same (ref: 88/2599/2). Any development would still affect the local skyline, dwellings in the vicinity would lose privacy and traffic flow would be adversely affected. A detailed list of arguments against these developments is provided below categorised by subject: Previous planning application Planning permission for HS33 was already refused in 1988 due to the high elevation of the land and the dominant effect of the new properties on the surrounding areas. The landscape has not changed in the last 30 years, and there is no need to reconsider the site for potential development. The rating of landscape sensitivity in the Draft Local Plan should be high rather than moderate. The site overlooks Loughborough and beyond, and any development will have a detrimental effect on the skyline of the town as well as dominating local housing leading to loss of privacy. The fields can be seen easily from many parts of the local estate and across Loughborough. Any building on this land would adversely affect the views from Loughborough towards to the Charnwood Forest. Hence, the landscape sensitivity of HS33 and HS34 should be rated high in the Draft Local Plan. 	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment. The Council can confirm that the original landscape sensitivity assessment did assess the sites individually and the wording in the report is clear that the sites have distinguishing individual features, which have been considered. The report presents the two sites at the same merely for reporting purposes. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
	 In 1999 when planning permission was refused partly due to its landscape, HS33 was boarded by Burleigh Wood and the same houses that are there today. Nothing substantial has changed, and I see no reason why this field should be 	Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC.
	being reconsidered for development. <u>Charnwood Forest</u>	Flood risk – the site selection work has assessed and considered the

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	 The sites HS33 and HS34 identified in the Draft Local Plan are both in the Charnwood Forest. The Leicestershire and Rutland Wildlife Trust oppose the isolation of woodland areas from the rest of the Forest. The development of HS33 and HS34 will isolate Burleigh Wood (and adjoining Holywell Wood) from the remainder of the Forest. The Draft Local Plan states that it will comply with the guidelines of the Charnwood Forest. Hence, this is sufficient reason for the Charnwood Borough Council to oppose to the developments in sites HS33 and HS34. Is the Charnwood Borough Council aware that developments of HS33 and HS34. Is the Charnwood Borough Council aware that developments of HS33 and HS34. Is the Charnwood Borough Council aware that developments of HS33 and HS34 will isolate Burleigh Wood from the remainder of the Charnwood Forest? This is in direct contradiction with the aims of the Leicestershire and Rutland Wildlife Trust with which the Local Plan must adhere. Green spaces The sites HS33 and HS34 border an ancient wood that is home to wildlife. Any construction on this land will impact the wildlife that needs access to bordering habitat to survive. Green open spaces are important for the health and well-being of children and adults. They offer opportunities for physical activity. The National Planning and Policy Framework for England 2019 that provides an overall policy that the Charnwood Borough Council should be pursuing includes an environmental objective – 'to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, etc'. Considering the national framework, the proximity of the ancient Burleigh Wood to the proposed developments in HS33 and HS34 require these are not implemented in the Local Plan. Increased traffic In 1988 it was found that the traffic exiting/entering from Thirlmere to Napantan	level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1 Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.

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	 Local Plan. The housing development in the north of Loughborough, the planned hub near junction 23 and further development of the Loughborough University Science Park are continuing to bring substantial increases to the traffic on Snells' Nook Lane, particularly at peak times. Due to the proximity of existing substantial properties at the junction of Snell's Nook Lane and Nanpantan Road, improvement does not seem to be possible. The increase in traffic due to 250 extra cars (two for each of the planned 125 new houses) feeding on to Snell's Nook Lane will further deteriorate an already severely overloaded road and junction. This makes it inappropriate to consider site HS34 any further and it should be removed from the Draft Local Plan. Flood and water What would be the effect of a housing development in HS33 on the risk of flooding of pre-existing houses located at a lower level, considering the height of site HS33 and the pond within the area south-east of Burleigh Wood? How would the brook run along the north-west side of Burleigh Wood be affected by the housing development? I believe the developments proposed in the Local Plan for sites HS33 and HS34 are in detriment of the quality, character, environment and amenity value of the area, as outlined in the points above. In conclusion, I request that HS33 and HS34 are not included in the house developments in the Local Plan. 	
EDCLP/22 Dr Sergio H P Cavalaro	 Draft Charnwood Local Plan 2019-36 – Response to question 8 I wish to make you aware of a number of strong objections that I have with regard to the proposed housing development in the Local Plan in sites HS33 (land off Leconfield Road) and HS34 (land rear of Snell's Nook Lane). As an immediate neighbour to the sites, I believe that the proposed development will have a serious impact on our standard of living. Our specific objections are as follows: 1. Previous refusal of planning permission 1. Planning permission was refused in 1988 with one reason being the effect on traffic flow. Given that no significant measures have been taken to improve traffic flow in the 	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	area, the argument for refusal must remain.	Further transport modelling work is being carried out, and the feedback

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CONSULTEE	 Planning permission was refused in 1988 due to the high elevation of the land in HS33 and the dominant effect of the new properties on the surrounding areas. There has been no change in the landscape since then. Hence, there is no reason why the development should be considered again. The rating of landscape sensitivity in the Draft Local Plan should be high rather than moderate. The site HS33 overlooks Loughborough and beyond, and the development will have a detrimental effect on the skyline of the town as well as dominating local housing leading to loss of privacy. The landscape sensitivity of HS33 and HS34 should be rated high in the Draft Local Plan given that the fields can be seen from the local estate and across Loughborough. Any building on this land would adversely affect the views from Loughborough towards to the Charnwood Forest. Charnwood Forest The Draft Local Plan states that it will comply with the guidelines of the Charnwood Forest. The Leicestershire and Rutland Wildlife Trust opposes the isolation of woodland areas from the rest of the Forest. The development of HS33 and HS34, both in the Charnwood Forest, will isolate Burleigh Wood and Holywell Wood from the remainder of the Forest. Hence, this is reason alone for the Charnwood Borough Council to oppose the developments in sites HS33 and HS34. Green spaces The National Planning and Policy Framework for England 2019 that provides an overall policy that the Charnwood Borough Council should be pursuing, includes an environmental objective – 'to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, etc'. In the light of the national framework, the proximity of the ancient Burleigh Wood to the proposed developments in HS33 and HS34 border an ancient wood that is home to wildlife. Any construction on this land will impact the wildlife that needs access to bo	and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment. The Council can confirm that the original landscape sensitivity assessment did assess the sites individually and the wording in the report is clear that the sites have distinguishing individual features, which have been considered. The report presents the two sites at the same merely for reporting purposes. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site. Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC. Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1 Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	being of children and adults. They offer opportunities for	

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CONCELLE	physical activity. The National Planning and Policy	
	Framework for England 2019 offer opportunities for physical	
	activity. 4. Increased traffic	
	1. The traffic exiting/entering from Thirlmere to Napantan Road	
	due to the development of HS33 would increase to a degree	
	that the planning must be rejected. This same argument	
	was made in 1988 when the proposal was refused. In the	
	past 30 years, neither the roads nor the junction in the	
	vicinity of HS33 and HS34 have been upgraded and with	
	the substantial increases in traffic it would be irresponsible for the Charnwood Borough Council to include HS33 and	
	HS34 in the Local Plan.	
	2. The housing development in the north of Loughborough, the	
	planned hub near junction 23 and further development of	
	the Loughborough University Science Park are continuing to	
	bring substantial increases to the traffic on Snells' Nook	
	Lane (a B road already heavily loaded, particularly at peak times). The increase in traffic due to 250 extra cars (two for	
	each of the planned 125 new houses) feeding on to Snell's	
	Nook Lane will further deteriorate an already severely	
	overloaded road and junction.	
	3. Furthermore, the proximity of existing substantial properties	
	at the junction of Snell's Nook Lane and Nanpantan Road	
	makes it impossible to improve the traffic flow.	
	Consequently, it is inappropriate to consider site HS34 any further and it should be removed from the Draft Local Plan.	
	5. Flood and water	
	1. There is no assessment about the effects of a housing	
	development in HS33 on the risk of flooding of pre-existing	
	houses located at a lower level, considering the height of	
	site HS33 and the pond within the area south-east of	
	Burleigh Wood.	
	The brook running along the north-west side of Burleigh Wood could be negatively affected by the housing	
	development.	
	I trust that the above objections will be taken fully into account in	
	the appraisal of the Draft Local Plan.	
EDCLP/24	I feel very strongly that areas of land such as HS33 and HS34	Overall - The Council has appraised the sites through the Strategic
Lisa Ambler	should be protected due to their importance for the Charnwood	Housing Land Availability Assessment, and subsequently through the
	Community. Both these sites sit in the Charnwood Forest – is that	Sustainability Appraisal.
	not enough of a reason to protect them! Be proud of them and	Prominence / Visual Impact - Site selection was informed by landscape

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CONSULTEE	ensure they represent our community not build on them!	and visual assessments, but will be reviewed in light of representation
	On those points	and previous planning refusal.
	• HS33 - I believe that building here at such a high elevation	
	would have a massive impact on the neighbouring houses	Traffic – The Council is aware of the potential transport impacts
	as it would be high and dominating above them – this would	associated with new developments. The Charnwood Local Plan Option
	be domineering and lead to loss of privacy. There must be	Testing Report (2019) explored the implications of the growth scenarios,
	some respect for the existing residents.	and the preferred development strategy.
	 HS33 – this site backs straight on to the ancient woodlands 	Further transport modelling work is being carried out, and the feedback
	which we should be cherishing and protecting not	and information from this response will be included in the work.
	encroaching upon. We should show some respect for this	
	precious site.	Landscape – The material and evidence presented in the response will
	The views from Charnwood Forest would be massively	be considered as part of the additional landscape sensitivity assessment
	impacted by building on HS33 and HS34 – terrible news for	work that is being carried out.
	Charnwood	
	I see no reason why anything has changed since planning for development in 4000 was refused for the US22 site. Any	Ancient Woodland - It is recognised that the site is adjacent to adjacent
	for development in 1988 was refused for the HS33 site. Any development would still affect the local skyline, dwellings in	woodland, and this confirmation of data will be used in the further site assessment work.
	the vicinity would lose privacy and traffic flow would be	
	adversely affected.	Ecology / Biodiversity – Site selection was informed by ecological /
	The current changes along the A512 have had an immense	biodiversity assessment, however, further ecological assessments are
	impact on traffic around the area and further development	being carried out, and will inform the assessment of the site.
	and additional housing post development would be	3
	massively detrimental to the area and its residents as the	Geology – The geology of this site will be investigated and used to inform
	roads will struggle to cope.	the assessment of the site.
	The recent floods in Charnwood have been horrendous and	
	show how very important it is that we maintain some green	Infrastructure – The impact of the development in terms of infrastructure
	spaces to ensure water can run off.	requirements has been considered as part of the IDP. The Council
	• Developing of HS33 and 34 will affect the brooks that run	continues to liaise with LCC on education matters. Where infrastructure
	there and could well lead to further flooding (over and above	is required this will be delivered by LCC.
	that caused by rain and lack of soak space).	Flood viels the eite eduction work has accessed and even damed the
	Developing of HS33 would lead to further traffic exiting onto Nanpantan Road , both during the past construction. The	Flood risk – the site selection work has assessed and considered the
	Nanpantan Road – both during the post construction. 'The nearby junction of Thirlmere Drive/Nanpantan Road,	level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1
	through which the bulk of traffic flows from this site and the	Thisk Zone 1, and the land 11034 is predominantly in 11000 thisk Zone 1
	existing residential area off Thirlmere Drive pass, is of	Buffer to Burleigh Wood - If the site is allocated as part of the local plan,
	insufficient capacity to cater for the additional traffic likely to	then Policy LP3 makes provision for the careful planning of the site, and
	be generated by the proposal, particularly in respect of the	it would be expected that any buffer and/or transitional arrangement
	congestion caused by traffic exiting from Thirlmere Drive	between the wood and the development site, would be confirmed through
	onto Nanpantan Road at peak periods'	the Development Management process.
	Snells Nook Lane will provide the only access to the	
	proposed HS34 development and is already heavily	Access to open space/ green space – The site selection process, through
	overloaded with traffic at peak times. This will become	the SHLAA and SA confirms that the sites are both within 400 metres of
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	worse with the development of the University Science and Enterprise Park, the 3200 new houses on the Garendon Estate and the proposed 'hub' at junction 23 of the M1. I am really worried that Snells Nook Lane can't take any more and HS34 should not be in the Local Plan.	open space.
EDCLP/29 David Potter	I understand that the council is considering the allocation of land off Snells Nook Lane, Nanpantan, to the local plan for building purposes. I would like to point out that at peak time the lane already suffers from an excess of traffic, and it is not unusual to see queues from the Nanpantan junction all the way back to the lights on Ashby Road. It is difficult to see how the addition of a further 120 houses, which are all likely to need access to the lane at peak time, would improve the situation. Indeed the traffic survey carried out by the Highways Agency for the proposed Wilson Bowden science Park, indicating that as far as the junction with Nanpantan Road is concerned, the junction currently operates significantly over capacity, and after the proposed development the issue would be significantly exacerbated when the entire site was completed. My understanding is that this survey was purely for the purposes of the science Park and did not take into consideration the addition of 120 houses requiring access. Additional traffic generated by these houses are likely to cause complete gridlock for many hours of the day and stop traffic flow through to Nanpantan and villages beyond. It is therefore difficult to envisage a scenario where there would be sufficient capacity on the local roads, without the creation of new road system on the Nanpantan side of the town. In order to bypass the lane, it would therefore be necessary to build roads close to the ancient Burleigh Woods. I would therefore suggest that without a complete rethink of the traffic system on the Nanpantan side of Loughborough, that the inclusion of a further 120 houses would not be feasible. I would therefore be grateful if the council would refuse permission for the land to be included on the local building plan.	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/30 Denise Potter	I understand from discussions with neighbours and friends that the council is considering the land behind Snells Nook Lane bordering Burleigh woods for the building of 120 houses. I am extremely concerned about the effects this will have on the ancient Burleigh Woods both for the wildlife and fauna. The 2 areas being considered for the houses are the only 2 natural areas	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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	bordering the wood if these are destroyed the wildlife in the wood have no where to go for extra food in order to survive. I understand from previous surveys that the land around Burleigh Wood is granite with a small amount of topsoil. So in order to build houses the ground would have to be blasted to lay the foundations, resulting in severe disruption to both local residents and the wildlife found both in the wood and the fields surrounding. The woods are a fantastic green space for local residents and the building around these woods would destroy the natural habitats of the wildlife not to mention the subsoil of the woods themselves due to drainage issues of water. We all need green spaces in our busy lives to enjoy the countryside and relax as mental health problems are on the increase, so we desperately need to keep these tranquil green areas. Houses are necessary but so are these areas for our wellbeing. Concerns are also raised regarding the extra traffic this will bring to Snells Nook Lane which is at present severely stretched to capacity and by 120 houses being built and bringing another possible 240 cars to the area the traffic will be even worse. I know because I witness the long queues both morning and night from my house on this lane. Add on the the new business park proposal and gridlock is guaranteed. PLEASE PLEASE do not let this development go ahead	 Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site. Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/33 Sandra Jasper	I wish to object to the draft local plan - Chapter 5 question 8 In particular I object most strongly to the proposed housing developments in Nanpantan namely those off Snells Nook Lane and Leconfield Road. There is already a huge problem with traffic at the Snells Nook Lane and Nanpantan Road junction, with traffic queueing all the way back down the lane every single weekday without fail. The proposed Science parks would increase the traffic problems terribly to a severe level. I cannot believe that you wish to further exacerbate this by putting 120 new homes on Snells Nook Lane - this would add another 240 cars every day onto a critically over- trafficked road, assuming normal car ownership - and much more - up to 500 cars additionally if you allow student homes there. The road is busy and dangerous and I can't believe you would wish to add to that. My son is [redacted] - the traffic on our lane already prevents him from cycling on the lane and walking there. Any further development and traffic would endanger lives and I ask you to consider this very carefully. This is a major issue that should prevent you allowing additional	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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	building here. I am also hugely concerned by the impact the two proposed developments will have on Burleigh Wood. This is an ancient woodland of national importance. I believe it is a terrible idea to enclose it by the development of houses. The animals there use the surrounding fields as additional feeding areas and it would be completely inappropriate to remove these and would endanger many species. Furthermore the noise pollution and light pollution form the proposed housing developments would severely impact on the animals and birds, as well as on the public who use the woods as an area of quiet enjoyment. Additionally, there would also be a loss of privacy for existing residents if these homes are constructed. Nanpantan residents are under siege from planners with the incinerator, the two science parks and with these new housing plans. It no longer feels like a village at the end of a lane but a long term building site. I urge you to reconsider the proposed housing developments at Nanpantan in light of the impact on the woods and the most severe traffic problems. Loppose the development	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/41 lan Kent	problems. I oppose the development. Draft Policy LP 3 / Draft Charnwood Local Plan 2019 36 / HS33 Land off Leconfield Road Dear Sir/Madam, With reference to the draft policy LP3 I would like to register my objection to the plans for 25 houses on site ref: HS33 Land off Leconfield Road. As a local resident I feel that the application should be rejected, for several reasons. <u>1. Increased traffic congestion and pollution:</u> Planning permission was refused in 1988 with one reason being the effect on traffic flow in the local area (Refusal of Planning Permission, 88/2599/2). No significant improvements have been made to improve traffic flow since that time and so this reason for refusal must remain. Nanpantan Ward is bordered by Nanpantan Road to the south and Snells Nook Lane runs through its western side. These roads and their junction are often overwhelmed by vehicles at peak times. Soon to the north will be added the housing development on the Garendon Estate and the further developments on the Loughborough University Science and Enterprise Park towards Snells Nook Lane and beyond. <u>2. Loss of privacy:</u> Planning permission was refused on 1988 for HS33 (land off Leconfield Road) as 'A development on the site would be likely	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site
	Leconfield Road) as 'A development on the site would be likely 492	being carried out, and will inform the assessment of the site.

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	to dominate many of the dwellings in the vicinity of the site leading to a loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the	Geology – The geology of this site will be investigated and used to inform the assessment of the site.
	 Norizon as viewed from the majority of hearby dweimigs which would be detrimental to the residential amenity of the area' (Refusal of Planning Permission, 88/2599/2). The local landscape has not changed in the last 30 years (HS33 is still bordered by the same properties and Burleigh Wood) and there is no need to reconsider the site for potential development. <u>3. Detrimental environmental impact:</u> The field at the top of Leconfield Road (HS33) borders Burleigh Wood, an area listed on the Leicestershire Inventory of Ancient Woodland. I am afraid the Wood's wildlife and ecology will be irreparably damaged by the proposed housing development. Loughborough University has a 'Woodland Management Plan' for Burleigh Wood that proposes the development of 'transitional habitats' to protect the wood and has added 1.2 hectares as a buffer for wildlife and ecology. <u>4. Provision of amenity green spaces:</u> There appears to be no provision for additional Green Space in the Draft Local Plan proposing housing developments on HS33 and HS34 which would only make the shortfall worse, surely these areas should instead be earmarked for addressing the shortfall and poor local access to Green Space? HS33 and HS34 are well placed in the centre of existing residential areas of the Ward, and so helping meet the target in the Open Spaces Strategy of residents being no more than 400m from Amenity Green Space. Surely the detrimental impact of construction, the negative impact on the Loughborough skyline, damage to wildlife and ancient woodland, increased traffic, pollution and removal of an amenity green space outweigh the need for these new houses which could be built elsewhere. The refusal of planning permission in 1988 due to the landscape 	Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	sensitivity, loss of privacy and traffic flow. Nothing substantial has changed in the last 30 years so I see no reason why this field HS33 (land off Leconfield Road) should be being reconsidered for development	
EDCLP/45 Christian Jasper	I want to object to the proposed housing developments in Nanpantan, off Snells Nook Lane in particular. I [redacted] live on Snells Nook Lane, the traffic here is absolutely dreadful already, without the addition of extra cars which your plans would allow. It is	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.

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	a very dangerous road, and I don't feel safe to ride my bike in the lane, or walk there. More traffic from new houses would make it even more dangerous [redacted]. I think that instead of the proposed houses, you should make that land into protected green space, where children can play, elderly people can walk safely and the community can use. There is very little green space like this in Nanpantan and I think you are damaging our community. I am also concerned that your plans to build houses will have a negative effect on the wildlife in Burleigh wood. A lot of the wildlife uses the surrounding fields to feed and live in. If you cover these fields in houses, then you are damaging the environment and the wildlife in it. This draft plan is supposed to safeguard the area for [redacted] the future. We don't want to grow up in a concrete jungle. I hope you take notice of my views.	 Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.
EDCLP/49 Hazel Richardson	Objections to the development of land at the top of Leconfield Road, Loughborough - HS33 and H34 - Response to Question 8 of the Draft Local Plan Planning permission for the development of land at the top of Leconfield Road/Tynedale Road was refused in 1988. In the 30+ years since then, nothing has changed. The arguments put forward then, are still relevant and pertinent today.	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	Environmental issues. This land was formed in the Cambrian period, 508-526 million years ago, and is the Swithland foundation, comprised of mudstone and sedimentary bedrock. These small pockets of land are important transitional habitats to the beautiful Burleigh Woods and Horseshoe Woods, which were ancient hunting grounds, and form part of the Charnwood Forest. By developing these sites, these ancient woods would be isolated. The effect on the many species of mammal and insect population would be severely disrupted. These areas are home to many species of birds of prey, and 40 species of wild birds, muntjacs, badgers, foxes and protected Pipistrelle and Whiskered bats, 200 species of moth, 16 species of hover fly, many species of fungi. Not to mention butterfly populations. Already, these areas of land are surrounded by university and housing development. They should be given a High Rating in the Landscape Sensitivity	 Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform

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	Assessment and taken out of the local plan. You should look to your own report on Biodiversity and make these areas Nature reserves, as have many other areas of Loughborough and surrounding villages have. Accessibility The small pocket of land HS33 has an elevation of 86 metres. The	the assessment of the site. Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC. Flood risk – the site selection work has assessed and considered the
	Interstating potector hand ribbo has all clovation of the trest. The lowest 79 metres. Any housing would tower above the houses on Leconfield and Tynedale plus Montague Drive. Privacy, light pollution, accessibility would impact hugely on this estate. Any building work would create problems due to the geological nature of this land. Noise and access would cause problems on this small, narrow road, which is also a bus route. Further traffic from the proposed 25 houses would impact on the already busy junction with Berkeley and Thirlmere Drive, not to mention the junction on to Nanpantan Road. At school times, these roads are extremely congested, with busy parents dropping off and picking up children from Holywell School. Several times a year your own Parking Enforcement officers patrol our streets at these peak times to record parking infringements, and congestion as it is a problem for local residents. Already, the school is full and over-subscribed, with young families having to drop / pick up their children from different junior schools across town. This creates more traffic and stress to parents rushing to get to different schools at the same time! If family houses were built, then these extra children would not have school places. (This is a problem across many local schools in Loughborough). Charnwood Borough council should be building schools or even redeveloped old, disused buildings into schools rather than allow more student flats. A development at HS 33 would dramatically change the visual	 Inder Hite Site Scheduler work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1 Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	impact of the town as houses would obscure the wood and be higher than the rest of Loughborough. These two precious pockets of land should be protected and form part of your own Biodiversity plan. I have lived on this estate 31 years, and many other residents since the houses were built in the early 1970's. HS 33 has been used as a local walking area, once having access to Burleigh woods before the University took over the a management of the woods. My understanding is that an	

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	application can be made to have such areas designated as public footpaths if they have been in common use for at least 10 years.	
	I would be interested to know what type of houses have been proposed for this site and HS34? If they are of the type already built on Snells Nook Lane, these are more akin to mini-mansions ranging in price from £600,000 to £950,000. Hardly within the pocket of the average wage earner in this area!	
	Please consider these important issues. There are many more factors that I have not mentioned, but no doubt other concerned Nanpantan residents will argue these points.	
EDCLP/54 Mark & Joy Walsh	First of all, I believe there is a covenant on HS33, that "it cannot be built on for ever and 1 day" So how can it be possible to set it aside for building land.	The Council does not believe that there are any covenants associated with land at HS33. This will be reviewed in light of this response.
	If there was to be a development on this land, it would have a serious impact on our and our neighbours privacy. Our lounge is at the back of our property, with a window combination of 3.5m wide and 2.5 m high, looking directly up the hill of HS33, which starts	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	15m from the window combination of our lounge. So any houses, roads or pathways, will look directly down and into our lounge, I think the word goldfish bowl comes to mind. We don't mind the odd dog walker, but when you get car headlights shining into your	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	lounge every 5 minutes, I think that's a different matter. Any development on HS33 would completely dominate this beautiful area and spoil the ancient woodland that runs along side HS33. Traffic is already a nightmare in the area, without adding to it.	Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work.
	I also believe that planning permission on HS33 has been refused in the past and nothing has changed in the area. As a resident in the immediate area of HS33. I have major concerns on how developers will dig down. I know from experience that the rock here that lies just below the surface is very hard. I	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	don't think developers could dig by normal means, therefore causing considerable noise, vibration and nuisance when digging down for utilities, which could damage surrounding properties.	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	Bearing in mind that the rock formation here is of international importance. The site rises significantly from the end of Leconfield Road and	Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment.
	shields the woodland behind. In order to achieve an acceptable road gradient, deep excavation will be necessary which will change completely the character of the landscape. It will also change the hydrology of the field significantly which could do harm to the	The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out.

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	woods, taking away ground water and lowering the water table.	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
		Geology – The geology of this site will be investigated and used to inform the assessment of the site.
		Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/56 John Seary	I have [redacted] enjoyed the benefit of a view of Burleigh Wood across HS33,and the bats that hunt in my garden on clear evenings, but I am now 77 years of age and the outcome of the local plan or any subsequent building is unlikely to affect me	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	personally. Nevertheless I would like to propose that development of the two areas be deleted from the draft plan. There are a number of reasons for this including the already increasing traffic on Nanpantan Road but I particularly wish to	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	address two aspects, Natural Heritage and Visual Impact. Charnwood has a number of patches of woodland, but as an ancient wood Burleigh Wood has particular significance and the continuance of its value depends to a considerable extent on the preservation of the natural area surrounding it. Development of the	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	two areas would mean that approximately 52% of boundary would be in close proximity to housing with a further 28% close to the more or less sterile environment of sports pitches. If the land were	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	developed as proposed the wood would continue for some years to be a pleasant place to view bluebells in the spring, but its environmental value would be rapidly degraded.	Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment.
	I admit that before I came to live here I was a bit scornful of Loughborough, but I soon found it to be a very pleasant place to live, though I would not claim that it was among the most beautiful of towns. It does however have as a backdrop the hills and woods	The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out.
	of Charnwood Forest and as they are visible from many points in the town they are of great benefit in improving the appearance of the town. HS33 stands at a relatively high elevation and houses built upon it would be visible from much of the town. Though much	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
	of the backdrop would still remain, the Outwoods for example, the intrusion caused by housing on HS33 would be seriously detrimental to the views.	Geology – The geology of this site will be investigated and used to inform the assessment of the site.
	It is clear that there is a need to provide housing for an expanding population, but there is also much stress being placed on the	Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council

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	importance of protecting the environment. I believe that in trying to balance these two concerns Charnwood should take into account these points and others and delete the proposed development	continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC.
	HS33 and HS34 from the draft plan.	Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1
		Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process.
		Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/57 Lizzie Potter	I understand that they are plans to build around 120 new homes on the land behind Snells Nook Lane which borders the ancient Burleigh Wood as well as 25 new houses near Leconfield Road. I am extremely worried that any new homes that is to be built in the	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	area will have a severe and detrimental effect to both the wildlife, flora and fauna as well as the fact that HS33 is known to have rock that dates back to the Cambrian era, which the area of Charnwood	Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment.
	is known to have fossilised animal remains that have been found and is of international scientific interest. Both sites for the proposed housing plans are both located in the Charnwood Forest and as per the draft for the local plan in section	The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out.
	3.4, one of the environmental objective is to "protect the special and distinctive qualities of all landscapes, maintaining local distinctiveness and sense of place, and paying special attention to impacts on Charnwood Forest" How are they protecting this type of	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
	landscape by adding housing developments to land bordering the wood, as they are not adhering to the pledge they made and this would likely have a detrimental effect to the landscape and its local	Geology – The geology of this site will be investigated and used to inform the assessment of the site.
	wildlife, who would be bordered in all sides from the rest of the Charnwood Forest, which may result in a severe loss or reduction of wildlife in the area, as they may have no access to food. This would be a terrible and crying shame. This area of Charnwood contains a large concentration of wildlife of	Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process.
	Charnwood Forest that is of special scientific interest (including Badger Bats) and local wildlife sites, especially with the already added destruction of the natural environment through hedge	Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of

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EDCLP/71 William Davis Ltd	 removal, ploughing of grasslands, development and road building for previous development. I would urge the planners to think of how they would be causing destruction of the local habitat and to think what David Attenborough would say about this potential loss of natural green spaces. On a side note the traffic around Nanpantan Road and Snells Nook Lane continues to worsen as the queues on both roads are long, whether it is day or night and makes it difficult to even get in and out the driveway. If the development especially at HS34 was to go ahead, in addition to the new business/science park it would make the traffic situation even worse than it is now and would cause total gridlock. I urge the planning committee to come and see the traffic issues we encounter day and night and how the development would be a terrible idea. REF: DRAFT CHARNWOOD LOCAL PLAN (2019 – 36) PREFERRED OPTIONS: PROPOSED ALLOCATION OF LAND TO THE REAR OF SNELLS NOOK LANE (HS34) I refer to the above consultation document. Please accept this as a formal response to the Draft Local Plan (DLP) on behalf of William Davis Limited (WDL) in relation to the preferred option allocation HS34: Land rear of Snells Nook Lane. WDL support the proposed future allocation of the site for residential development and can confirm its deliverability. The site is under option and promoted by WDL, a local and well renowned housebuilder; with a proven track record for delivering homes in the East Midlands. The intention is to submit a full application alongside the adoption of the Local Plan, with the aim to begin building out the site as soon as consent is gained (circa early 2021.) In order to support the delivery of the site, WDL have commissioned background reports and surveys as follows: A naccess design strategy undertaken by RLRE (December 2018) highlighting safe vehicular access and egress from Snells Nook Lane. The strategy provides for a right turn ghost lane into the site	open space. The Council welcomes confirmation on matters of deliverability, this evidence will be included in the SHLAA proforma for the site. The Council expects to have further discussion with the promoter/developer on the timescale for delivery. The SHLAA has identified that the site is likely to come forward in Years 6 – 10. If the developer/promoter has more detailed information to show that the site can come forward before this timeframe, then this should be submitted to the Council. The additional evidence submitted will be analysed, and where appropriate, used to inform further site assessment work – for example, the additional transport information will be sense-checked through the forthcoming Transport Modelling work being prepared by the Council and LCC.
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	 sustainability in accordance with the overarching intentions of the NPPF. and concludes that the development is acceptable in overall transport terms. An Ecological Assessment completed by Landscape Science Consultancy (March 2019) which highlights limited and low potential for any protected species on, or near to, the site. A Heritage Assessment completed by Lanpro (May 2019.) The Assessment noted development would not impact upon any nearby heritage assets due to existing topography, vegetation and buildings screening the landscape sufficiently. The Assessment also noted there to be low/nil potential for archaeological remains on site. A Flood Risk Assessment completed by BSP (March 2019) which determined the site to offer no risk of ground water or fluvial flooding with a suitable drainage strategy proposed. The above reports have been summarised within the Vision Document which accompanies this representation. This document includes a conceptual masterplan which highlights how the site could deliver much needed homes in a sustainable setting without impacting upon the surrounds or the adjacent Science Park allocation. Alongside this, Charnwood Borough Council's own site selection evidence a part of the SHLAA supports the site's allocation. The Landscape Review notes development to offer only a moderate impact; and Ecological Assessment notes development could suitably mitigate against any potential harm. In summary, inclusion of the site within the emerging Local Plan is robustly supported by a suite of reports and assessments undertake by both WDL and the Council, ultimately determining the allocation of Site HS34 to be in accordance with relevant policy set out in the NPPF. 	
EDCLP/75 Matthew Martin	I have read the Draft Charnwood Plan and would like to add my comments as a local resident [redacted]. I would particularly like to comment on the plans for HS33 and HS34, which are close to our family home. [redacted] and we moved here as family live in the area and we would like the housing plan to reject these proposals as this one of the last green areas in this part of town and it is very important to the quality of life for families to have green areas to relax and spend time with children. I was a geography student and I found out that there is a special	 Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback

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EDCLP/76 Jayna Patel	rock formation in HS33 which is ancient Cambrian Rock, in particular I think that building on a site of formed volcanic rock does not celebrate the area's internally volcanic legacy. It is highly possible that a survey could reveals fossils and it is unlikely normal machinery could penetrate this rock and high explosives would have to be used. HS33 is also beside Burleigh Wood which is used by families for Easter Egg hunts, runners and is of natural beauty, if this was built on the wildlife and ecology would be damaged, the forest is also supposedly registered in the Doomsday book, we have been in contact with the University and there is a Woodland Plan for this area which would be irreparably damaged by the proposed housing development. Finally there is a house being built by William Davis beside HS33 and this is in its 7th year of build and has caused neighbours a lot of stress and annoyance [redacted] There is no regard to the local residents and young children. [redacted] the roof of the house spoils the skyline and any houses built on HS33 would destroy it even further and break the skyline where it is possible to see the planets on a clear night where the University Planetarium and telescope is beside Butleigh Wood. Planning permission was refused here in 1988 [redacted]. I have read the housing plan and would like to provide my views on the plan regarding HS33 and HS34 in detail, thanks. 1. There is very hard rock forming the hill under HS33 (land off Leconfield Road). Construction and the installation of utilities would cause considerable noise nuisance for households in the vicinity. 2. A survey carried out by a professional geologist in 1988 found that a very hard lower-Cambrian rock is present under HS33 (land off Leconfield Road). Consequently, any development of this site would involve considerable noise, adversely affecting the wellbeing of nearby residents and local wildlife in and around the adjacent Burleigh Woods.	OFFICER RESPONSE and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1 Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Geology – The geology of this site will be investigated and used to inform the assessment of the site.
	earliest	

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EDCLP/77 Nanpantan Ward Residents' Group	forms of multi-cellular life in Britain. The rocky outcrops in this northern edge of the Charnwood Forest are formed of Cambrian rock, including the hill on HS33. I can't understand why any form of development could possibly be considered here. Please preserve this unique heritage of our Charnwood landscape by ensuing no form of construction takes place here. 5. Are you seriously considering destroying an area of land that is part of Charnwood's unique geology? Surely, you know that the Cambrian rock foundation of HS33 is an area of geologically international importance? Please ensure this field is removed from the Local Plan. 6. One of our Nanpantan Residents has carried out a geological investigation of HS33. It is clear from the British Geological Survey map of the area that the hill on HS33 is formed of 'hard Cambrian slate-like rocks' and is likely to 'lie immediately below the top soil. If, as seems likely from the geological map, the hard Cambrian slate- like rocks are just below the grass and soil over much of the area of the field, this could present some civil engineering issues; including the provision of utilities'. This and the steep slope of the land is probably why the land was not built upon during earlier housing developments in the immediate vicinity. Being the last open space in the area, if HS33 is developed for housing the Council will not now, or in the future, be able to meet the open space standards for Nanpantan Ward as specified in the Open Spaces Strategy. The opportunity will be forever lost to provide the benefits listed in the Strategy, including safeguarding physical and mental health, wellbeing, biodiversity and the mitigation of climate change. Nanpantan Ward Residents' Group wish to work under the National Planning Policy Framework with Charnwood Borough Council and Charnwood Planning Services to get HS33 re-designated as Local Green Space. See Q30 for remainder of response relating to designation as Local Green Space Sites allocated to housing. LP3 Code HS33 Leconfield Road. T	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.

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	the support of residents, we have been trying to get this field set aside for recreation. Our proposal has been to add this small parcel of land to the adjacent Burleigh Wood and provide open space for our residents. This proposal has the active support of our local councillors, Margaret Smidowicz and Geoff Parsons. This is the only remaining available open space in Nanpantan ward and so if this open space is developed, the Council will not be able to meet the targets set in its Open Spaces Strategy document.	
	Code HS34 Land East of Snells Nook, also adjacent to Burleigh Wood. Snells Nook is a narrow lane, yet is considered a strategic through-route to the West of the town; it acts as a link to the motorway from the south. Snells Nook is at the heart of the four main proposals for expansion on the west of the town, namely the SUE for 3400 homes, the University's Science and Enterprise Park, a western extension of this park and the very large incinerator to be built close to Junction 23 slip road, with many hundred traffic movements each day. Snells Nook is already heavily congested at peak times and the developments in train will worsen this congestion considerably. On traffic flow grounds alone no further housing should be allowed unless, or until, a relief road is constructed. Our residents feel so strongly about these two proposals that you can expect many complaints asking that both these sites be removed from the draft local plan. Our solution is to remove these two proposals from the Local Plan.	
EDCLP/80 Historic England	HS34 - Grade II Burleigh Farmhouse immediately to the east of the site.	The impact on the setting of listed building has been considered as part of the site selection work. The evidence will be reviewed in light of this response.
EDCLP/85 M Woods	I would like to respond to the above and have been made aware of recent plans by the council about two areas that affect me as I am a resident in the Nanpantan Ward. I believe that the following issues need to be addressed and taken into consideration when the	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	draft plan is decided. I think that HS33 and HS34 should be removed from the draft plan as there is plenty of other areas to build in which will not affect the local community as much as these would when there is already a very large site at Garendon planned.	Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work.
	Pls consider the following reasons: 1. The Geological Survey confirms that HS33 consists of a hill formed of ancient Cambrian volcanic rock. Similar rocky outcrops are found in Swithland Wood and somewhat older outcrops in the 503	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback

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	Outwoods and Beacon Hill. Section 7.20 of the Draft Local Plan says it will support the objectives of the 'Landscape Partnership Scheme' (Charnwood Borough Council is a project partnersh. The Landscape Partnership Scheme states that, 'The Charnwood Forest Landscape Partnership Scheme will celebrate the area's internationally important volcanic legacy'. Building on a site formed of volcanic rock in the Charnwood Forest does not 'celebrate the area's internationally important volcanic legacy' and the site must surely not make it to the Local Plan for any purpose other than protection from development. 2. The field at the top of Leconfield Road (HS33) borders Burleigh Wood, an area listed on the Leicestershire Inventory of Ancient Woodland. I am afraid the Wood's wildlife and ecology will be irreparably damaged by the proposed housing development. Loughborough University has a 'Woodland Management Plan' for Burleigh Wood that proposes the development of 'transitional habitats' to protect the wood and has added 1.2 hectares as a buffer for wildlife and ecology. Surely, the Council should aim to do the same on the 1.4 hectares currently planned for housing and stop the Wood becoming isolated from the rest of Charnwood Forest to the south? As part of the environment strategy, the Draft Local Plan says in Section 7.31 that 'we must manage our natural environment to limit damage and habitat fragmentation'. Is the Council just paying lip service to good sounding ideals, or will it take them seriously and remove the site from its Plan? 3. The Draft Local Plan states that it will comply with the guidelines of the Charnwood Forest contains a high concentration of Sites of Special Scientific Interest and Local Wildlife Sites, but these places have become increasingly isolated by activities such as hedge removal, ploughing of grasslands, development and road building'. The development of HS33 and HS34 will isolate Burleigh Wood (and adjoining Holywell Wood) from the remainder of the Forest. Surely this is reason al	and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site. Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1 Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space. The provision of green space, the impact of the proposed development and the ability to meet the standards set out in the 2017 study will be considered in the next stage of site assessment work, and will inform the next draft of the local plan.

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	population at that time of 5440. Given the standard in the Open	
	Spaces Strategy is 1.4ha per 1000 people, this gives a shortfall of	
	more than 5ha in the area. There appears to be no provision for	
	additional Green Space in the Draft Local Plan to cover the shortfall	
	in Nanpantan. Rather than the Draft Local Plan proposing housing	
	developments on HS33 and HS34 which would only make the	
	shortfall worse, surely these areas should instead be earmarked for	
	addressing the shortfall and poor local access to Green Space?	
	HS33 and HS34 are well placed in the centre of existing residential	
	areas of the Ward, and so helping meet the target in the Open Spaces Strategy of residents being no more than 400m from	
	Amenity Green Space. We have started work supported by the	
	Open Spaces Society with a view to applying for a Local Green	
	Space designation for HS33 under the National Planning	
	Framework published by the Department for Communities and	
	Local Government. If HS33 could be marked in the Local Plan as a	
	candidate for an Open Space this would help us in achieving this	
	designation. It is clear that HS33 is already being used for local	
	amenities, such as dog walking, accessing Burleigh Wood and we	
	have had sufficient snow in recent winters for the hill to be used by	
	hundreds of local children (and adults!) for sledging.	
	5. The Draft Local Plan Interim Sustainability Appraisal Report	
	contains a rather sad statement on page 98 that HS33 is 'the last	
	area of open green space in the area'. Hopefully this says enough	
	by itself. In case it doesn't, remember that HS33 is in the centre of	
	the Napantanan Ward and so would efficiently provide green space	
	to residents, noting that the Ward has less than a third of the Green	
	Space specified in the Open Spaces Strategy and it is already	
	planned that we will be surrounded by the housing development on	
	the Garendon Estate and the Loughborough University Science	
	and Enterprise Park towards Snells Nook Lane and soon beyond.	
	Please can we keep our 'last area of open green space in the area'?	
	6. Nanpantan Ward is bordered by Nanpantan Road to the south	
	and Snells Nook Lane runs through its western side. These roads	
	and their junction are often overwhelmed by vehicles at peak times.	
	Soon to the north will be added the housing development on the	
	Garendon Estate and the further developments on the	
	Loughborough University Science and Enterprise Park towards	
	Snells Nook Lane and beyond. There have also been three	
	housing developments along Snells Nook Lane in recent years. We	
	are in the Charnwood Forest, yet our Ward is being covered by	
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	concrete. Surely HS33 and HS34 as the only Open Spaces we have left must remain to give the area some lungs to provide	
	protection against all the additional pollution these developments	
	will bring?	
	7. Planning permission was refused in 1988 for HS33 (land off Leconfield Road) as 'the site's elevation and open nature make an	
	important contribution to the character of the area and that a	
	development of the site, due to its unique prominence within the	
	immediate locality and also from wider parts of the town, would be	
	substantially detrimental to that character thereby detrimental to the	
	visual amenity of the area' (Refusal of Planning Permission, 88/2599/2). In fact, the recent Landscape Sensitivity Assessment	
	agrees, stating that 'development on these slopes [of HS33] may	
	be out of keeping with the existing settlement pattern'. The local	
	landscape has not changed in the last 30 years (HS33 is still	
	bordered by the same properties and Burleigh Wood) and there is	
	no need to reconsider the site for potential development.	
	8. Planning permission was refused on 1988 for HS33 (land off Leconfield Road) as 'A development on the site would be likely to	
	dominate many of the dwellings in the vicinity of the site leading to	
	a loss of privacy and would be likely to breach the horizon as	
	viewed from the majority of nearby dwellings which would be	
	detrimental to the residential amenity of the area' (Refusal of	
	Planning Permission, 88/2599/2). In fact, the recent Landscape	
	Sensitivity Assessment agrees, stating that 'development on these	
	slopes [of HS33] may be out of keeping with the existing settlement pattern'. The local landscape has not changed in the last 30 years	
	(HS33 is still bordered by the same properties and Burleigh Wood)	
	and there is no need to reconsider the site for potential	
	development.	
	9. Planning permission was refused in 1988 with one reason being	
	the effect on traffic flow in the local area (Refusal of Planning	
	Permission, 88/2599/2). No significant improvements have been made to improve traffic flow since that time and so this reason for	
	refusal must remain.	
	10. The comment on page 76 of the Landscape Sensitivity	
	Assessment states that the site 'has low-moderate landscape	
	sensitivity, as it is more closely associated with existing	
	development and screened from the wider landscape by existing	
	woodland'. This is incorrect. From most parts of HS33 there are	
	wide and open views over much of Loughborough and across to the Wolds east of the town. A further indication that the Landscape	
	The words case of the town. A further indication that the Landscape	

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	Sensitivity Assessment has not been fully carried out is that it shows no pictures taken from or showing HS33. We can provide	
	these. No one who visits the site and correctly records their	
	observations can possibly say that the field is screened from the	
	wider landscape by existing woodland'. The Landscape Sensitivity	
	Assessment of HS33 is clearly flawed and the only reasonable	
	action at this stage is to remove HS33 from the Draft Local Plan.	
	11. The Draft Local Plan states that it will comply with the	
	guidelines of the Charnwood Forest. Section 7.20 of the Draft	
	Local Plan says it will support the objectives of the 'Landscape Partnership Scheme'. This Partnership Scheme states that	
	Charnwood Forest contains a high concentration of Sites of	
	Special Scientific Interest and Local Wildlife Sites, but these places	
	have become increasingly isolated by activities such as hedge	
	removal, ploughing of grasslands, development and road building'.	
	The development of HS34 will isolate Burleigh Wood (and adjoining	
	Holywell Wood) from the remainder of the Forest. Surely this is	
	reason alone that Charnwood Borough Council should not allow	
	HS34 to be included the Local Plan?	
	12. From the Assessment Study carried out by Nortoft Partnerships in 2017, in the Nanpantan Ward there is an existing provision of	
	2.45ha of Amenity Green Spaces, Parks and Gardens for the	
	population at that time of 5440. Given the standard in the Open	
	Spaces Strategy is 1.4ha per 1000 people, this gives a shortfall of	
	more than 5ha in the area. There appears to be no provision for	
	additional Green Space in the Draft Local Plan to cover the shortfall	
	in Nanpantan [7]. Rather than the Draft Local Plan proposing	
	housing developments on HS33 and HS34 which would only make	
	the shortfall worse, surely these areas should instead be	
	earmarked for addressing the shortfall and poor local access to	
	Green Space? HS33 and HS34 are well placed in the centre of existing residential areas of the Ward, and so helping meet the	
	target in the Open Spaces Strategy of residents being no more	
	than 400m from Amenity Green Space.	
	13. Nanpantan Ward is bordered by Nanpantan Road to the south	
	and Snells Nook Lane runs through its western side. These roads	
	and their junction are often overwhelmed by vehicles at peak times.	
	Soon to the north will be added the housing development on the	
	Garendon Estate and the further developments on the	
	Loughborough University Science and Enterprise Park towards	
	Snells Nook Lane and beyond. There have also been three	
	housing developments along Snells Nook Lane in recent years.	

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sriftind Elassisti Lio ela trani distri Lin Lidis y din Li vinitin si didin Fini L	Surely HS33 and HS34 as the only Open Spaces we have left must remain to give the area some lungs to provide protection against all he additional pollution these developments will bring? 14. The housing development on the Garendon Estate, the ongoing development of the Loughborough University Science and Enterprise Park and further potential developments towards the M1 are continuing to bring substantial increases to the traffic along on Snells Nook Lane, particularly at peak times. According to the submission by Leicestershire Local Highway Authority regarding he proposed development of a hub to the west of Snells Nook Lane, the Snells Nook Lane/Nanpantan Road junction already operates significantly over capacity. Due to the close proximity of existing properties to the roads at the junction of Snells Nook Lane and Nanpantan Road, substantial mitigation here does not appear to possible. The increase in noise and pollution brought about by an additional 250 extra cars (estimating two for each of the planned 125 new houses) feeding on to Snells Nook Lane will further deteriorate the wellbeing of those living close to an already severely overloaded road and junction. This makes it inappropriate to consider site HS34 any further and it should not appear in the Local Plan. 15. Planning permission was refused in 1988 for HS33 (land off Leconfield Road) due to the high elevation of the land and the dominant effect new properties would have on those in the surrounding area . The landscape has not changed in the last 30 years and there is no need to reconsider the site for potential development. 16. Planning permission was refused on 1988 for HS33 (land off Leconfield Road) due to the loss of privacy the new properties would have on those in the surrounding area . The landscape has not changed in the last 30 years and there is no need to reconsider he site for potential development. 17. The rating of landscape sensitivity in the Draft Local Plan should be high rather than moderate. The site overlooks Loughborough and b	

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	 The reasons planning permission was refused in 1988 remain the same (ref: 88/25999/2. Any development would still affect the local skyline, dwellings in the vicinity would lose privacy and traffic flow would be adversely affected. Planning permission was refused in 1988 with one reason being the effect on traffic flow. No significant improvements have been made to improve traffic flow since that time and so this reason for refusal must remain. In 1999 when planning permission was refused partly due to its landscape, HS33 was bordered by Burleigh Wood and the same houses that are there today. Nothing substantial has changed and I see no reason why this field should be being reconsidered for development. There is very hard rock forming the hill under HS33 (land off Leconfield Road). Construction and the installation of utilities would cause considerable noise nuisance for households in the vicinity. A survey carried out by a professional geologist in 1988 found that a very hard lower-Cambrian rock is present under HS33 (land off Leconfield Road). Consequently, any development of this site would involve considerable noise, adversely affecting the wellbeing of nearby residents and local wildlife in and around the adjacent Burleigh Woods. It is well known that the rocky outcrops in this northern edge of the Charnwood Forest are formed of Cambrian rock and I strongly suspect that the hill on HS33 is formed of similar material. I think you should be concerned about considering any form of construction on what is a unique feature in our Charnwood landscape. I am sure you are aware that Charnwood has a geology that is internationally important, containing fossilised evidence of the earliest forms of multi-cellular life in Britain. The rocky outcrops in this northern edge of the Charnwood Forest are formed of Cambrian rock, including the hill on HS33. I can't understand why any form of development could possibly be considered here.	

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	 27. One of our Nanpantan Residents has carried out a geological investigation of HS33. It is clear from the British Geological Survey map of the area that the hill on HS33 is formed of 'hard Cambrian slate-like rocks' and is likely to 'lie immediately below the top soil. If, as seems likely from the geological map, the hard Cambrian slate-like rocks are just below the grass and soil over much of the area of the field, this could present some civil engineering issues; including the provision of utilities'. This and the steep slope of the land is probably why the land was not built upon during earlier housing developments in the immediate vicinity. 28. The sites HS33 and HS34 identified in the Draft Local Plan are both in the Charnwood Forest. Surely this is sufficient reason in itself to remove these proposed sites from the Plan? 29. The Leicestershire and Rutland Wildlife Trust, in their document 'Charnwood Forest: A Living Landscape' under 'geological and geomorphological features' on page 51, states that 'The geology of Charnwood Forest is its most important nature conservation feature. Existing sites must be protected while opportunities for the study and conservation of new ones sought.' HS33 contains ancient volcanic Cambrian rock and for our Charnwood heritage we must protect this site. 30. In the Draft Local Plan, Section 3.4, an Environmental Objective is 'To protect the special and distinctive qualities of all landscapes, maintaining local distinctiveness and sense of place, and paying special attention to impacts on Charnwood Forest'. The sites HS33 and HS34 identified in the Draft Local Plan are both in the Charnwood Forest. Surely 'paying special attention' to Charnwood Forest. Surely by and secolopments, particularly on land immediately bordering the ancient Burleigh Wood and in an elevated position visible across Loughborough? 31. The Draft Local Plan states that it will comply with the guidelines of the Charnwood Forest. The Leicestershire and Rutla	OFFICER RESPONSE
	32. The Leicestershire and Rutland Wildlife Trust discusses 'Planning Applications and Neighbourhood Plans' and will object to applications in 'Living Landscapes', that includes the Charnwood Forest. You will notice that the 'Charnwood Forest Living	

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	Landscape Project' (of which Charnwood Borough Council is a partner) aims to 'conserve and enhance the unique wildlife, geology and character of Charnwood Forest'. You will be aware	
	that the hill on HS33 is of Cambrian rock, that is characteristic of the geological nature of Charnwood Forest and similar outcrops	
	occur on the other main outcrops in the Forest at the Outwoods and the Beacon. Any development on HS33 does not 'enhance the	
	unique wildlife, geology and character of Charnwood Forest', it buries it!	
	33. Is Charnwood Borough Council aware that developments of	
	HS33 and HS34 will isolate Burleigh Wood from the remainder of the Charnwood Forest? This is in direct contradiction with the aims	
	of the Leicestershire and Rutland Wildlife Trust which states 'The	
	most important area for wildlife in Leicestershire, Charnwood Forest contains a high concentration of Sites of Special Scientific	
	Interest and Local Wildlife Sites, but these places have become	
	increasingly isolated by activities such as hedge removal, ploughing of grasslands, development and road building.' with	
	which the Local Plan states it will adhere. 34. Burleigh Wood is part of Charnwood Forest and in the Priority	
	Habitat Inventory. Many forms of wildlife in woods need access to	
	wider areas for food. Access to the wider Charnwood Forest to the south will be severely hampered by developments of HS33 and	
	HS34. I am not sure how you could possibly consider a	
	development that has such an impact on local wildlife. Have you contacted the Leicestershire and Rutland Wildlife Trust about these	
	sites and how development would affect wildlife? I am sure their patron Sir David Attenborough would be up in arms!	
	35. I am not sure the best interests of the conservation of the	
	Charnwood Forest will be served by surrounding Burleigh Wood on all its four sides, as would happen if HS33 were developed. I	
	accept there will be a narrow corridor to Holywell Wood to the	
	north, but the site will become completely isolated from the main body of Charnwood Forest to the south. Three sides are covered	
	by the Loughborough Science and Enterprise Park (with one of	
	these possibly becoming William Davis housing), but its isolation would be completed by developing HS33.	
	36. The Leicestershire and Rutland Wildlife Trust in their document	
	'Charnwood Forest: A Living Landscape', sets out their 'vision of future' stating ' 'Our vision is for a Charnwood Forest that has a	
	healthy environment, rich in geology, wildlife and wild places, with opportunities for people to learn about and enjoy the beautiful and	

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	 exceptional landscape. It will be a place where wildlife can move through it freely and not be confined to a few special sites, and natural processes are allowed to function, in other words a living landscape'. Burleigh and Holywell Woods are being surrounded, by the Loughborough Science and Enterprise Park on three sides and now HS33 on the fourth. How does this allow for wildlife to move freely into the rest of Charnwood Forest? Please can you prevent HS33 from getting into the Local Plan and save our wildlife? 37. Draft Policy LP20 in the Draft Local Plan states that 'We will work with our partners to define, protect and enhance the Charnwood Forest Regional Park and support the aims of the National Forest Strategy by [] seeking tree planting within the Charnwood Forest Regional Park in accordance with Draft Policy LP23. Can I suggest that adopting HS33 and extending Burleigh Wood into this site would be an excellent way of showing Charnwood Borough Council is serious about this policy? 38. The second bullet point of Draft Policy LP2 on page 31 of the Local Plan is to 'protect the amenity of people who live or work nearby and those who will live in the new development'. The rejection of planning in 1988 on site HS33 stated that 'A development of the site would be dikely to dominate many of the dwellings in the vicinity of the site leading to a loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be destrimental to the residential amenity of the area to the south east of Burleigh Wood is a pond and in addition, given the height of the land on the field at the end of Leconfield Road, what effect would a housing development and hence the hard standing that goes with a housing development on this brock? What run off would there be from a housing development? 	
EDCLP/87 Mrs Zavery	I have read the Draft Charnwood Plan and would like to add my comments as a local resident [redacted]. I think that the areas of HS33 and HS34 should be removed from the plan for several reasons, there is the Burleigh Wood which is from the 1600s and	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.

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	this would be impacted which is used by the local community and University students that provide a good economic growth to the Town and country. Snells Nook Lane already has a large amount of traffic and in particular the traffic aspect at the Priory crossroads and figures Will be further impacted depending on where the entrance and exit are planned. The geology and Rock formation is something I don't fully understand but there is large boulders that might need blasting that could impact on the watercourse and recent geological surveys show that these would not be able to build on. The hill is steep and local residents get a lot of water coming down the hill and houses here would flood the residents on Tynedale and Compton Close. There is Heritage as well, centuries ago I thought there was an abbey could there be burial grounds? Many children use the woods and field as a play area which was designated a green space, and apart from Kirkstone Park for the children we have no green area for children and the Holywell School use these areas in summer for the kids as do the Nurseries on Nanpantan Road, Watermead and Nanpantan Pre School nursery.	 Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site. Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC. Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1 Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/93 Samantha Potter	I understand that the council is considering building 120 houses on the land behind Snells Nook Lane. From the details outlines on the Nanpantan website, I understand that building the houses will have an impact on traffic surrounding Nanpantan. There will be such an increase in traffic that the roads will not be able to cope and it would be irresponsible of Charnwood Borough Council to include these sites in the Local Plan. The housing development on the Garendon Estate, and development of the Science and Enterprise Park are bringing substantial traffic increases The increase in noise and pollution will deteriorate the wellbeing of those living on Snells Nook Lane. Snells Nook Lane will provide the only access to the proposed HS34 development and is already heavily overloaded with traffic at peak times. This will become worse with the development of the University Science and Enterprise Park, the 3200 new houses on the Garendon Estate. I	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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	am afraid Snells Nook Lane can't take any more and HS34 should not be in the Local Plan. Please do not let this development go ahead.	
EDCLP/101 Tim Jarram	I am writing to provide my comments on the Local Draft Plan. I am deeply concerned about the inclusion of sites HS33 and HS34 and I consider that there are so many strong arguments against their inclusion that they should not appear in the final Plan.	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	Question 25: I agree with the policies [Charnwood Forest and National Forest]. Please implement them, but bear in mind the following and remove sites HS33 and HS34 from the Local Plan.	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	The developments of HS33 and HS34 will isolate Burleigh Wood from the remainder of the Charnwood Forest. This is in direct contradiction with the aims of the Charnwood Forest Landscape	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	Project with which the Local Plan states it will adhere. In [1], the LRWT states that 'The most important area for wildlife in Leicestershire, Charnwood Forest contains a high concentration of	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	Sites of Special Scientific Interest and Local Wildlife Sites, but these places have become increasingly isolated by activities such as hedge removal, ploughing of grasslands, development and road building.' Remembering that the Draft Local Plan confirms that developments will adhere to the Charnwood Forest Landscape Project, the LRWT	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment of the site.
	sets out their 'vision of future' of this project [2], stating ' 'Our vision is for a Charnwood Forest that has a healthy environment, rich in geology, wildlife and wild places, with opportunities for people to learn about and enjoy the beautiful and exceptional landscape. It will be a place where wildlife can move through it freely and not be confined to a few special sites, and natural processes are allowed	Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process.
	to function, in other words a living landscape'. Burleigh and Holywell Woods are being surrounded, by the Loughborough Science and Enterprise Park [3] on two sides and now HS33 and HS34 on the remaining two. How does this allow for wildlife to move freely into the rest of Charnwood Forest?	Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	The sites HS33 and HS34 need to be removed as potential sites for development owing to their proximity to Burleigh Wood and the detrimental effects on existing wildlife. The Loughborough University Biodiversity Action Plan 2015-2020	
	[4] on page 7 states that '[Burleigh and Holywell Woods] require not only appropriate management to maintain their attractiveness to wildlife but also protection from the impact of nearby development.	

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	Changes in the water table and an increase in light pollution due to adjacent development can significantly impact on the biodiversity of the woodlands. Protection of the integrity of the woodlands is paramount as is their existing connectivity to the surrounding landscape.' The Action Plan was formulated using the advice of a broad range of ecological experts from across the UK. I think this should provide you with all the evidence you need to remove the sites that border Burleigh Wood from the Draft Local Plan. Page 15 of the same document [4] states that 'Many bat species will not tolerate artificial light' does seem to me to imply that any development adjacent to Burleigh Wood will affect the bat population. Although a Council may seek to put in place 'mitigation' that reduces the impact of developments in a case such as this, I can't really imagine how an adjacent new development could be built to avoid artificial light straying into the Wood. However, of course it is not just the wood itself that is used by the bats and they are often seen along Snells Nook Lane and hedgerows in the area (including HS33 and HS34). I understand that personal responses are rarely taken seriously, so I will try to summarise my direct impact here briefly:	
	As a resident close to the HS33 Leconfield Road land I would be greatly impacted by any building work that were to be carried out here. We moved into this house early 2019, on the understanding that this was the very end of Leconfield Road, (something we paid a premium for) as such it ends with a little cul de sac. I feel that if this was to be changed it would be both morally wrong and verging on illegal. It would presumably change our road to be the only access to the site and I foresee people parking down our road due to insufficient parking in most if not all modern estates. Something that would become a difficult problem to deal with and result in increasing tensions among residents. Other objections I strongly agree with: One good argument is that we are woefully short of open spaces in the Ward. The Council's own figures show that Nanpantan Ward has an existing provision of 2.45ha of Amenity Green Spaces,	

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	Parks and Gardens, a shortfall of more than 5ha. The Assessment Study also shows there is 8.43ha of Natural and Semi Natural Green Space in the Ward, a shortfall of more than 22ha. As we become surrounded by the University Science and Enterprise Park, developments on Snells Nook Lane and the 'hub' near junction 23, there are few open spaces left. If HS33 and HS34 are developed, there would be no opportunity now, or in the future, for the Council to meet its own open spaces targets. Charnwood Planning Office has also acknowledged that building close to Burleigh Wood is not acceptable, but I'm not sure they know what should be considered to be 'close'. As HS34 has a long border with the wood, any transitional buffer will considerably reduce the area available for development and make the site far less attractive for developers. The effects on the biodiversity of the woodland due to loss of access to foraging areas, disruption caused by pets, as well as stray artificial light from cars, buildings and street lights suggest a deep buffer. Burleigh Wood is of course managed by the University, who, in its consultation submission, is likely to recommend suitable transitional areas. We will just have to wait to see what it will recommend. Also, for HS34, the effect of any new development on local traffic will be important. The increase in noise and pollution brought about by an additional 250 extra cars (estimating two for each of the planned 125 new houses) feeding on to Snells Nook Lane will further deteriorate the wellbeing of those living close to an already severely overloaded road and junction. For HS33, the good arguments are that it is built on Cambrian volcanic rock that the Council has signed up to 'celebrate' as well as the effect on the skyline that any development will bring due to the topography of the site.	
	Final note:	
	The residents of Nanpantan have done an excellent job of researching and putting together legitimate reasons why these sites should not be included and I echo their well placed objections. We have a website here <u>https://www.nanpantan.com/arguments</u> I trust you will do the right thing and at the bare minimum exclude HS33 which for the relatively small amount of gain in terms of housing is absolutely not worth the negatives and the impact on our great Town. Nanpantan is considered a prime location in Loughborough due to it being so close to the forest. I'd hate to see	

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EDCLP/104 Joanna Herbert- Stepney	 plans like this go ahead and destroy an otherwise great Town. Sources: [1] Leicestershire and Rutland Wildlife Trust, Charnwood Forest Living Landscape Project, https://www.lrwt.org.uk/our-work-for-wildlife/living-landscapes/charnwood-forest-living-landscape-project/ [2] Leicestershire and Rutland Wildlife Trust, Charnwood Forest: A Living Landscape, https://www.lrwt.org.uk/media/uploads/charnwood_forest,_a_living_landscape.pdf. [3] Charnwood Borough Council, Concept Masterplan Framework for Loughborough Science and Enterprise Park, February 2016, https://www.charnwood.gov.uk/files/documents/lsep_concept_mast erplan_framework_2016_compressed/LSEP%20Concept%20Mast erplan%20Framework%202016.compressed.pdf. [4] Loughborough University, Biodiversity Action Plan 2015-2020, https://www.lboro.ac.uk/media/wwwlboroacuk/content/sustainability/downloads/Biodiversity%20Action%20Plan%20V3.pdf. I object strongly to these developments. If they were allowed Burleigh Wood would be surrounded by tarmac and development. Wildlife would be imprisoned, unable to get into countryside to feed and would become inbred, causing ill health and eventual extinction. As for the local humans, green countryside has recently been shown to be actually necessary for mental health. You propose to replace this with yet more buildings, more traffic, more polluted air and perhaps worst of all, more noise - all of which are detrimental to mental health! For example, at present, to drive down Snells Nook (out of rush hour) is a pleasant experience, smiling countryside all round. You propose to make it a horrible and depressing experience. The Cambrian rock under HS33 is unique and valuable internationally. It is easily accessible, just below the topsoil. It will almost certainly hold well preserved fossils - up to 606 million years of - as we have at lveshead. These fossils are of the very earliest forms of life in Britain, probably before animal had evol	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through

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		the Development Management process.
		Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/112 David Mulvaney	Question 8 - Sites HS33 and HS34 should not be considered for development The Council has agreed to 'celebrate' the volcanic rock of	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	Charnwood Forest The Geological Survey confirms that HS33 consists of a hill formed of ancient Cambrian volcanic rock [1]. Similar rocky outcrops are found in Swithland Wood and somewhat older outcrops in the Outwoods and Beacon Hill. Section 7.20 of the Draft Local Plan [2]	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	says it will support the objectives of the 'Landscape Partnership Scheme' (Charnwood Borough Council is a project partner). The Landscape Partnership Scheme [3] states that, 'The Charnwood Forest Landscape Partnership Scheme will celebrate the area's	Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work.
	internationally important volcanic legacy'. Building on a site formed of volcanic rock in the Charnwood Forest does not 'celebrate the area's internationally important volcanic legacy' and the site must surely not make it to the Local Plan for any purpose other than protection from development. The Council has agreed not to isolate areas in the Charnwood	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	Forest The Draft Local Plan [2] states that it will comply with the guidelines of the Charnwood Forest. Section 7.20 of the Draft Local Plan says it will support the objectives of the 'Landscape Partnership Scheme'. The Landscape Partnership Scheme [3] states that 'Charnwood Forest contains a high concentration of Sites of Special Scientific Interest and Local Wildlife Sites, but these places	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment
	have become increasingly isolated by activities such as hedge removal, ploughing of grasslands, development and road building'. The development of HS33 and HS34 will isolate Burleigh Wood (listed on the Leicestershire Inventory of Ancient Woodland) and adjoining Holywell Wood from the remainder of the Forest to the south. Surely this is reason alone that Charnwood Borough Council	Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process.
	should not allow HS33 and HS34 to be included the Local Plan? Planning permission was refused in 1988 Planning permission was refused for HS33 in 1988 for the following reasons [4] and does not need to be reconsidered. (a) The site's elevation and open nature make an important contribution to the character of the area and that a development of	Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.

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	the site, due to its unique prominence within the immediate locality and also from wider parts of the town, would be substantially detrimental to that character thereby detrimental to the visual amenity of the area. The local landscape has not changed in the last 30 years (HS33 is still bordered by the same properties and Burleigh Wood) and there is no need to reconsider the site for potential development. (b) A development on the site would be likely to dominate many of the dwellings in the vicinity of the site leading to a loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the area' In fact, the recent Landscape Sensitivity Assessment [5] agrees, stating that 'development on these slopes [of HS33] may be out of keeping with the existing settlement pattern'. The local landscape has not changed in the last 30 years and there is no need to reconsider the site for potential development. (c) The nearby junction of Thirlmere Drive/Nanpantan Road, through which the bulk of traffic flows from this site and the existing residential area off Thirlmere Drive pass, is of insufficient capacity to cater for the additional traffic likely to be generated by the proposal, particularly in respect of the congestion caused by traffic exiting from Thirlmere Drive onto Nanpantan Road at peak periods No significant improvements have been made to improve traffic flow since that time and so this reason for refusal remains. Protecting Burleigh Wood and habitats Loughborough University has a 'Woodland Management Plan' [6] for Burleigh Wood that proposes the development of 'transitional habitats' to protect the wood and has added 1.2 hectares as a buffer for wildlife and ecology. Surely, the Council should aim to do the same on the 1.4 hectares of HS33 currently planned for housing and stop the Wood becoming isolated from the rest of Charnwood Forest to the south? As part of the environment strategy, the Draft Local Plan [5] s	

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	Supporting documents [1] British Geological Survey, Solid and Drift Geology Map of Loughborough, available at http://www.largeimages.bgs.ac.uk/iip/mapsportal.html?id=1001634 [2] Draft Local Plan 2019-2036, Charnwood Borough Council, October 2019, https://www.charnwood.gov.uk/files/documents/draft_charnwood_lo cal_plan_2019_36/Draft%20Charnwood%20Local%20Plan%20201 9-36.pdf [3] Leicestershire and Rutland Wildlife Trust, Charnwood Forest Living Landscape Project, https://www.lrwt.org.uk/our-work-for- wildlife/living-landscapes/charnwood-forest-living-landscapeproject/ [4] Refusal of planning permission for residential development, land rear of 49-57 Tynedale Road, Charnwood Borough Council, 88/2599/2, 1998, https://cdn.websiteeditor.net/a8c2488736374401aecb8666b24a126 6/files/uploaded/Leconfield%2520Road%2520Decision%2520Notic e%2520P.88.2599.2-1.pdf [5] Landscape Sensitivity Assessment of SHLAA Sites, final report prepared for Charnwood Borough by LUC, March 2019, https://www.charnwood.gov.uk/files/documents/landscape_sensitivi ty_assessment_of_shlaa_sites_march_2019/Landscape%20Sensiti vity%20Assessment%200f%20SHLAA%20Sites%20%28March%2 02019%29.pdf [6] Loughborough University, Burleigh and Holywell Woodland Management Plan, August 2013, https://www.lboro.ac.uk/media/wwwlboroacuk/content/sustainability	
EDCLP/113 John Glover	/downloads/woodland_management_plan_v2.pdf My comments on the Draft Charnwood Local Plan 2019-2036 concern the two proposed areas for housing development HS33 and HS34 which are immediately adjacent to Burleigh Wood, an Ancient Forest which may be considered a natural heritage asset. The Woodland Trust recommend that Ancient Forests should be ringed with green surroundings in order to provide a visually suitable environment and also a passage for wild life. Among the principles that guide the Councils planning decisions are two that are relevant to HS33 and HS34	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts
	 a) "Our proposed strategy aims to guide new development to the most suitable locations in the Borough, protect our most environmentally sensitive locations andetc". b) "We accept that to fully appreciate our heritage assets it is important we ensure that their setting is respected. This may 	associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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	 include a variety of views of the asset and its surroundings and we will seek to ensure that they are not compromised" Hence it appears that HS33 and HS34 are not consistent with the CBC's planning criteria. The Charnwood Forest Regional Park was established in 2012 to co-ordinate the protection and management of this important landscape. It has a wide range of stakeholders from local communities, businesses and landowners together with representatives of heritage groups, local authorities, arts groups, charities and government bodies. CBC provided the first Chair of the Stakeholders Group (CIIr Vardy) until autumn 2019. An Action plan was agreed and work on the plan was divided between several Boards. The Development Delivery Board Report (22 Feb 2017) included as one of the key priorities " 6.5 Reconnecting and improving habitats". The implementation of HS33 and HS34, both of which lie within the boundaries of the Regional Park, would be contrary to this key priority. CBC have a moral (although not statuary) obligation to support the agreed aims of the Regional Park Boards. The field at the top of Leconfield Road is an oasis of peace and tranquillity with a beautiful sky-line of mature trees. It is the last green space in a location which has woefully less than the recommended area for green spaces. The implementation of HS33 and HS34 would make (145) is very small (0.8%). In my opinion the damage to the environment and green space provision far outweighs the small provision towards the housing target and consequently HS33 and HS34 should be removed from the Final Local Plan 	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/114 Barbara Singer	With reference to the development of sites HS33 and HS34. I am writing as a resident who has [redacted] enjoyed access to Burleigh Wood over the stretch of land HS33, now designated for building houses on the Draft Local Plan.	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	This land, I know has been owned by the Jean Copland Trust for many years and had been leased to a farmer for grazing for some time. No objections were ever made to local residents accessing the wood over this land. As a result, a generation of children and	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	now grand children have enjoyed this green space. Tynedale and	Ancient Woodland - It Is recognised that the site is adjacent to adjacent

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CONSULTEE	Leconfield Roads have enjoyed a very static population. Exchange of houses has been very limited over the years that we have lived here. I understand that plans for Charnwood and the Charnwood Forest seek to maintain and increase green spaces here. Surely as a well used local amenity this land should not be built on. From the photograph showing the main path across HS33 to Burleigh Wood and the arial view of HS33, a very entrenched network of footpaths is visible showing the high usage of this area. During our residency on Tynedale Road we witnessed an attempt, in 1988, to build on this land. Three main objections caused the plans to be terminated. Firstly the site is made up of extremely hard Cambrian rock causing great difficulty in the construction of necessary utilities for the housing, with an extreme disruptive impact, during development, on surrounding houses and the inhabitants of the woodland. Secondly the outlet for an increased traffic flow on to Nanpantan Road was already severely congested (30 years later, this is an even bigger problem). Thirdly, the elevated position of the housing would cause lack of privacy for existing houses and a detrimental effect on the skyline of Loughborough. Of particular importance as we are within the Charnwood Forest boundaries. None of these factors have changed. So why should building be allowed now? For myself the most important counter argument for developing more housing on both HS33 and HS34 is the effect on the extremely ancient woodland of Burleigh Wood and Holywell Wood. Both are listed in Natural England's Inventory of Ancient Woodland. Also in Charnwood Borough Councils List of Nature Reserves, Sites of Ancient Woodland and Sites of Special Scientific Interest. Holywell Wood was first recorded in 1240 and as woodland in 1330. The western edge of Burleigh Wood, (adjacent to HS33) has a very well preserved section of bank and ditch which enclosed the ancient park. A book by Meg Williams describes the antiquity and fascinating history of this area.	 woodland, and this confirmation of data will be used in the further site assessment work. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.

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	threat to Burleigh Wood is likely to be recreation and surrounding	
	land management. It is already heavily used for recreation and	
	there are poor transitional areas around the wood due to cultivation and development already right up to the edges of the wood on	
	Montague Drive and Compton Close."	
	The University have already improved the northern transitional area	
	of the woodland by planting large numbers of shrubs and trees.	
	This clearly needs to be done on all other boundaries of the wood	
	rather than the land being developed for housing.	
	Surely Charnwood Borough Council should be looking to purchase	
	and improve the transitional areas on all sides of the wood, this	
	land being an extremely sensitive area which forms the north eastern part of Charnwood Forest.	
	At a time when The Woodland Trust is encouraging tree planting on	
	a vast scale, providing grants for the improvement of our	
	woodlands, is this not a better route to go down than developing	
	HS33 and HS34 as housing plots? The increase of residents living	
	even closer to the wood, would undoubtedly have a detrimental	
	effect.	
	Because of the nature of Burleigh Wood, its antiquity and the	
	presence of a number of rare species of flora and fauna, the	
	university is committed to improving the biodiversity further and are now using the woodland for student based learning. All this would	
	be under threat if the housing developments are permitted on HS33	
	and HS34.	
	Finally I recently attended a Planning Committee meeting of the	
	council where they where deciding on passing planning permission	
	for new roads joining Snells Nook Lane from the developments to	
	the west side.	
	Surveys by Traffic England were produced to say increased traffic	
	on Snells Nook from this development would not be a problem, but many of the committee members having local knowledge of the	
	regular gridlocks already encountered here, agreed to defer the	
	agreement for both new proposed junctions to go ahead.	
	At this stage, no mention of the increase in traffic that would be	
	inevitable with the proposed housing development on HS34 was	
	mentioned. Surely another reason to reconsider these plans.	
	The residents of Tynedale and Leconfield Roads value their	
	position on the outer edges of Charnwood Forest and would, I	
	know, be devastated by the proposed developments of HS33 And	
EDCLP/122	HS34, and so I urge you to reconsider your development plans. Having recently witnessed the Draft Local Plan I am concerned	Overall - The Council has appraised the sites through the Strategic
	naving recently withessed the Drait Local Plan I am concerned	Overall - The Council has appraised the sites through the Strategic

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	 regarding the development proposals for the Areas HS33 and HS34. I fail to understand why the reasons for the rejection of such development in 1988 have changed. Furthermore, the reasons for rejection seem even stronger today than they were over 30 years ago. Can you please explain the reasons for the changes resulting in ignoring the previous rejection? 1. There seems no change to the 1988 rejection case regarding the intrusive nature of development surrounding long existing houses at the top of Tynedale Road and Montague Road. These properties will be overlooked by the inevitable high standing of any proposed development in the field behind them. 2. Holywell Wood is a rare natural asset to the community and used by many local people. It is maintained as natural woodland 	 Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	 (which we are told is being lost at an alarming rate) by the University. It is natural woodland, home to many birds and mammals whose habitat is under constant threat. Development of the natural corridors surrounding the wood will jeopardise the existence of its present state. 3. The traffic issues are far, far worse today than in 1988. Leconfield Road (which I believe would provide access to HS33) is a busy, quite narrow road used by many residents for parking and service and delivery vehicles. It is also used by many residents of Tynedale Road in order to avoid the traffic and pedestrian chaos at the school drop off and pick up times for Holywell School. Queuing to pull out onto Nanpantan Road can take 15 minutes with long tail backs. 	Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment
	 Even at other times, to pull out onto Nanpantan Road from Thirlmere Drive (particularly a right turn) can involve a lengthy wait and is potentially hazardous. Visibility to the right is particularly bad due to hedging. Should residents of additional housing in HS33 have to use this egress and access then the existing problems will be made far worse. 4. The Green Space around Loughborough seems, in general terms, to be radically eroded in the Draft Local Plan to an alarming extent. Is the degree of erosion in line with Government Guidelines or does it exceed these? 	Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/124 Eric Schofield	I wish to object to the draft plans inclusion of burliegh wood for the following reasons Increased traffic on snells nook lane that cannot cope already Loss of residential amenity space for the area	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.

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	Nanpantan should be kept separate from Loughborough Burleigh wood is home to several protected species Previous planning application being refused and all the reasons for refusal are still relevant	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment
		Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/127 Timothy Mulvaney	HS33 and HS34 Nanpantan Ward is becoming surrounded by developments and the extra traffic that comes with it. We are already being encircled by the Loughborough Science and Enterprise Park as its	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	development progresses towards Snells Nook Lane and beyond. Soon to the north will be added the housing development on the Garendon Estate and there have also been three recent housing developments along Snells Nook Lane. We are in the Charnwood	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	Forest, yet our Ward is being covered in concrete. Surely HS33 and HS34 as the only open spaces we have left must remain to give the area some lungs for protection against all the additional pollution these developments are bringing? The Draft Local Plan Interim Sustainability Appraisal Report on	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	page 98 states that HS33 is 'the last area of open green space in the area'. HS33 is in the centre of the Napantanan Ward and so would efficiently provide green space to a large number of	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	residents. As the Ward has less than a third of the green space specified in the Open Spaces Strategy, please can we keep our 'last area of open green space in the area'?	Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment.
	Landagene Canaitivity Accessment of DCU1447 (UC22)	The Council can confirm that the original landscape sensitivity
	Landscape Sensitivity Assessment of PSH447 (HS33) The Landscape Sensitivity Assessment [1] for sites PSH447	assessment did assess the sites individually and the wording in the report is clear that the sites have distinguishing individual features, which
	(HS33) and PSH133 (HS34) has been performed jointly. Despite	have been considered. The report presents the two sites at the same
	their close proximity, the sites are quite different in nature, feeling	merely for reporting purposes.
	and outlook. It is often not clear to which of the two sites the	The material and evidence presented in the response will be considered
	comments in the Landscape Sensitivity Assessment refer, resulting	The material and evidence presented in the response will be considered

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 in confused and unclear statements. Furthermore, ratings have been given jointly to the two sites, when, due to a number of major differences in their nature, this is not appropriate. There are also significant inaccuracies in the Landscape Sensitivity Assessment. The single sentence giving the overall assessment states that 'PSH477 has low-moderate landscape sensitivity, as it is more closely associated with existing development and screened from the wider landscape by existing woodland'. From most parts of PSH477 there are wide and open views over much of Loughborough and across to the Wolds east of the town. I'm afraid that no one who visits the site and correctly records their observations cannot reasonably conclude that the field is 'screened from the wider landscape by existing woodland'. A further indication that the Landscape Sensitivity Assessment to showing PSH477. We can provide these. Here is a picture it looking east from PSH477 [2] and here is a video from the middle of PSH477 [3]. The visual evidence clearly shows that the site is the certainly not 'screened from the wider landscape by existing woodland'. Other landscape sensitivity impacts have not been included, the field is corrected. 	as part of the additional landscape sensitivity assessment work that is being carried out. Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
CONSULTEE	 2. Natural character The site borders Burleigh Wood that is listed on the Leicestershire Inventory of Ancient Woodland. Loughborough University who manage the wood has developed substantial transitional habitats to protect the biodiversity of the wood. PSH447 itself is transitional in nature and is well used by wildlife in the woods and any development on the site will affect the wildlife in the woods and so the woods themselves. High 3. Historic landscape character The hill that dominates the site is formed of volcanic rock that is similar nature to that forming other hills in Charnwood Forest and 	
	 provides the its distinctive heritage. high (this issue alone should preclude inclusion of this site) 4. Form, density, identity and setting of existing settlement/development 	
	To quote from the original Landscape Sensitivity Assessment [1] while PSH447 is also on a slope. Development on these slopes may be out of keeping with the existing settlement pattern.' I think it clear from this wording and the outcome of previous planning applications that this site is unsuitable for a housing development. high	
	5. Views and visual character including skylines There is no mention of PSH477 in the Landscape Sensitivity Assessment. A number of the statements about views probably don't refer to PSH477 such as 'The large power station chimneys at Ratcliffe-on-Soar are visible in distant views to the north' and 'roof tops of recently development on the edge of Nanpantan mark views	
	to the south west.'. However, standing in PSH477 gives expansive views to the north, east and south and it is clear that the skyline will be significantly and adversely affected by any development. high 6. Access and recreation	
	There is no official public access to PSH477 but many local walkers and dog-walkers access the field and use it to access Burleigh Wood beyond. In winter, hundreds of local children (and adults) use the hill for sledging. However, the Local Plan Interim Sustainability	
	Appraisal Report [4] states that PSH477 is 'the last area of open green space in the area', we would like to see this developed into a local green space for Nanpantan. The site is vitally important for the wellbeing of the area. high	
	7. Perceptual and experiential qualities PSH477 has high scenic value due to the long views to the north, east and south and to the west is the beautiful Burleigh Wood; the	

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	site is particularly tranquil and rural in this part of the field. There are no roads immediately bordering the site and as the only farming is now hay being gathered once a year it has a distinctly rural feel. moderate-high	
	Recommendation The landscape sensitivity of PSH477 be recorded as high and item 3 should be sufficient in itself to rule out the site from further consideration. Had the appropriate evidence that is available here been made available Sustainability Appraisal, it is clear that the site should have been discounted and not progressed to the draft Local Plan.	
	Supporting Documents [1] Landscape Sensitivity Assessment of SHLAA Sites, final report prepared for Charnwood Borough by LUC, March 2019, <u>https://www.charnwood.gov.uk/files/documents/landscape_sensitivi</u>	
	ty assessment of shlaa sites march 2019/Landscape%20Sensiti vity%20Assessment%20of%20SHLAA%20Sites%20%28March%2 02019%29.pdf [2] Picture taken from the top of the hill on HS33,	
	https://cdn.website- editor.net/a8c2488736374401aecb8666b24a1266/files/uploaded/vi ew%2520from%2520field%2520over%2520Loughborough.png [3] Video taken from the centre of HS33,	
	https://drive.google.com/open?id=1CtNIPvGm7Puxm1O8JMLPP3 WzSUgRFGRq [4] Aecom, Charnwood Local Plan Sustainability Appraisal: Spatial	
	Strategy, prepared for Charnwood Borough Council, October 2019, https://www.charnwood.gov.uk/files/documents/draft_charnwood_lo cal_plan_2019_36_interim_sustainability_appraisal_report_october _2019./Draft%20Charnwood%20Local%20Plan%202019- 36%20Interim%20Sustainability%20Appraisal%20Report%20%28	
	October%202019%29.pdf	
EDCLP/131 Dr M. & Dr R. Goodwin	We are responding to question 8 in the draft local plan and are opposed to the proposal to develop on land in the Nanpantan area (HS33 and HS34) for the following reasons. 1. Development of HS33 will significantly impact the open	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	views across to Burleigh woods and across Loughborough by removing the open space which is currently enjoyed by many walkers and local residents. Having open space within built up areas, particularly with great views over	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/132	 Loughborough and beyond is important for the wellbeing of the local residents. As a town, Loughborough should conserve key landmarks which make it unique and leverage them to its advantage. This fits with the Vision for Charnwood 2036 where it 'will be known for its natural and built environment which provides a place that people want to visit and explore'. The land is home to many wild animals that move between the woods, field and gardens. Any development would remove the wild habitat and push the animals into the woods, ultimately leading to reductions in animal numbers. Only this week a small deer came into our garden and spent an hour wandering around it looking for food. The additional light created at night time from the developments so close to the woods would also be a disturbance for wildlife. The traffic on Nanpantan Road is already at excessive levels, and the 2 proposed developments within Nanpantan will only exacerbate the problem. Every day during busy periods there are long traffic jams running from the Priory cross roads in all directions and pollution levels are undoubtedly too high. Any development would be disruptive to the local community, with site works and construction traffic moving to and from the site. There would also be additional noise created whilst excavating the rock for foundations and ground works. In the Vision for Charnwood 2036 it states 'our communities will have access to a range of green spaces, leisure and recreational facilities across Charnwood and new parkland in Loughborough and Thurmaston will be provided'. Why propose developing on a fantastic green space only to provide a new one somewhere else? 'Growth at Loughborough will be managed to respond to its rich history and relationship with Charnwood Forest' is highlighted in the Vision for Charnwood 2036. Building houses around all sides of Burleigh Woods is not in keeping with this vision. 	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
		The evaluation values access to green space and open space for foredulor

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Elizabeth Mulvaney	I have grown up in the middle of Nanpantan Ward, near HS33. There are small open spaces at the east of the Ward, too far for children living near me to walk to safely. Apart from HS33, there are no open spaces in the centre or to the west of Nanpantan. If HS33 is developed, the last opportunity to provide open space in this part of the Ward will be lost. I understand there is pressure to provide more housing, but should this be at the expense of the health and wellbeing of the children in the area? If HS33 makes it into the local plan as a site to be developed, I would be interested to know how this can be justified given the lack of open space.	and the contribution it makes to quality of life, and quality of place. This response will shape the further analysis of the site.
EDCLP/135 Jonathan Ivins	 HS33 I wish to register my objection to this application and I hope the application will be refused. My objection is based on a number of points as listed below. Firstly, I refer to the reasons why planning permission for HS33 was refused in 1988 1. Planning permission was refused in 1988 for HS33 (land off Leconfield Road) due to the high elevation of the land and the dominant effect new properties would have on those in the surrounding area [2]. The landscape has not changed in the last 30 years and there is no need to reconsider the site for potential development. 2. Planning permission was refused on 1988 for HS33 (land off Leconfield Road) due to the loss of privacy the new properties would have on those in the surrounding area [3]. The landscape has not changed in the last 30 years and there is no need to reconsider the site for potential development. 3. The fields can be seen easily from many parts of the local estate and indeed right across Loughborough. Any building on this land would adversely affect the views from Loughborough towards to the Charnwood Forest. 5. The reasons planning permission was refused in 1988 remain the same [1]. Any development would still affect the local skyline, dwellings in the vicinity would lose privacy and traffic flow would be adversely affected. No significant improvements have been made to improve traffic flow since that time and so this reason for refusal must remain. 6. The nearby junction of Thirlmere Drive/Nanpantan Road, through which the bulk of traffic flows from this site and the existing residential area off Thirlmere Drive pass, is of insufficient capacity 	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out, and will inform the assessment of the site. Geology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.

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	to cater for the additional traffic likely to be generated by the proposal, particularly in respect of the congestion caused by traffic exiting from Thirlmere Drive onto Nanpantan Road at peak periods' [1]	
	 References for the first six points. 1. Rejection of planning permission for residential development, land rear of 49-57 Tynedale Road, Charnwood Borough Council, 88/2599/2, 1998. 2. 'The Local Planning Authority are of the opinion that the site's elevation and open nature make an important contribution to the character of the area and that a development of the site, due to its unique prominence within the immediate locality and also from wider parts of the town, would be substantially detrimental to that character thereby detrimental to the visual amenity of the area' from Refusal of planning permission for residential development, land rear of 49-57 Tynedale Road, Charnwood Borough Council, 88/2599/2, 1998. 3. 'A development on the site would be likely to dominate many of the dwellings in the vicinity of the site leading to a loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the area' from Refusal of planning permission for residential development, land rear of 49-57 Tynedale Road, Charnwood Borough Council, 88/2599/2, 1998. 	
	 Secondly, I turn to the impact of construction. 7. A survey carried out by a professional geologist in 1988 found that a very hard lower-Cambrian rock is present under HS33 (land off Leconfield Road) [1a]. Consequently, any development of this site would involve considerable noise, adversely affecting the wellbeing of nearby residents and local wildlife in and around the adjacent Burleigh Woods. 8. In addition to the building work there will be further considerable disturbance and noise when water, sewerage, gas, electric and other utilities are provided. These factors will inevitably have a deleterious impact upon residents and local flora and fauna. 9. Charnwood has a geology that is internationally important, containing fossilised evidence of the earliest forms of multi-cellular life in Britain [2a]. The rocky outcrops in this northern edge of the Charnwood Forest are formed of Cambrian rock, including the hill on HS33 [1.a]. Construction work will inevitably destroy the geology 	

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	and fossil record. 10. The Landscape Partnership Scheme [3a] states that, 'The Charnwood Forest Landscape Partnership Scheme will celebrate the area's internationally important volcanic legacy'. Given the destruction of the rocks during construction the volcanic legacy will not be celebrated but ruined.	
	References for points 7-10. [1a]British Geological Survey, Solid and Drift Geology Map of Loughborough, available at <u>http://www.largeimages.bgs.ac.uk/iip/mapsportal.html?id=1001634</u> . [2a]. Natural England, National Character Area profile of Charnwood <u>http://publications.naturalengland.org.uk/file/4633163</u> [3a]Leicestershire and Rutland Wildlife Trust, Charnwood Forest Living Landscape Project, <u>https://www.lrwt.org.uk/our-work-for- wildlife/living-landscapes/charnwood-forest-living-landscape- project/. In addition the following offers relevant guidelines and comments Draft Local Plan 2019-2036, Charnwood Borough Council, October 2019, <u>https://www.charnwood.gov.uk/files/documents/draft_charnw</u> ood_local_plan_2019_36/Draft%20Charnwood%20Local%20Plan %202019-36.pdf</u>	
	 <u>Thirdly, matters concerning Burleigh Wood</u> Thirdly, matters concerning Burleigh Wood The Burleigh and Holywell Woodland Management Plan produced by Loughborough University [1c] states that 'Burleigh Wood is largely surrounded by arable land with poor transitional habitat. The woodland edge is one of the most valuable habitats in woodlands especially if it contains 'transitional habitat' of shrubs and ground flora species.' We could improve the woodland edge of HS33 and HS34 allowing protection of the many flora and protected species, including Pipistrelle and Whiskered bats [1c]. The sites HS33 and HS34 in the Draft Local Plan [4c] both border the ancient Burleigh Wood that is home to protected species, including badgers bats [2c]. Any construction on this land will impact such wildlife that need access to bordering transitional habitat in order to thrive. The Loughborough University Biodiversity Action Plan 2015-2020 [2c] on page 7 states that '[Burleigh and Holywell Woods] require not only appropriate management to maintain their attractiveness to wildlife but also protection from the impact of nearby development. Changes in the water table and an increase 	

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CONSULTEE	in light pollution due to adjacent development can significantly impact on the biodiversity of the woodlands. Protection of the integrity of the woodlands is paramount as is their existing connectivity to the surrounding landscape.' The Action Plan was formulated using the advice of a broad range of ecological experts from across the UK. 14. The National Planning and Policy Framework for England 2019 [3c] directs planning policy for Charnwood Borough Council to follow. The Framework includes an environmental objective on page 5, namely 'to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity'. In the light of the National Planning and Policy Framework, the proximity of the ancient Burleigh Wood to the proposed developments HS33 and HS34 require these are not carried forward into the Local Plan [4c] References for points 11-14 [1c] Loughborough University, Burleigh and Holywell Woodland Management Plan, 18 September 2013, https://www.lboro.ac.uk/media/wwwlboroacuk/content/sustainability /downloads/woodland_management_plan_v2.pdf. [2c] Loughborough University, Biodiversity Action Plan 2015-2020, https://www.lboro.ac.uk/media/wwwlboroacuk/content/sustainability /downloads/Biodiversity%20Action%20Plan%20V3.pdf. [3C] Ministry of Housing, Communities and Local Government, National Planning Policy Framework. February 2019, https://assets.publishing.service.gov.uk/government/uploads/syste m/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised. pdf. [4c] Draft Local Plan 2019-2036, Charnwood Borough Council,	
	October 2019, <u>https://www.charnwood.gov.uk/files/documents/draft_charnw</u> <u>ood_local_plan_2019_36/Draft%20Charnwood%20Local%20Plan</u> %202019-36.pdf	
EDCLP/136	HS33	Overall - The Council has appraised the sites through the Strategic
Melanie Pepper	I write with extreme concern that the council are considering allowing the building of 25 dwellings on the land at the top of Leconfield Road.	Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	This land is the only green area remaining around this part of estate and is the only refuge left for the foxes, badgers and other wildlife that live in the woods adjacent to the field. Especially now with plans to build the Science Park being given the go ahead to	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.

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	take up greenbelt from the other side of the wood. Also over the years, people have put hard standing at the front of their properties, removing grass and soil, which now leads to our side of the road becoming a river when we have heavy rain. If you allow building to take place on this area. You remove the last, large area of green belt with soakaway properties, which will mean that we will be exposed to higher levels of flooding every time it rains heavily. We are extremely concerned about this effect on our property. Our other concern is related to the high traffic volume this is going to create, as most properties now have at least two vehicles per property. We purchased our home, due to the quiet location, which would be greatly affected by the increase in traffic movement. We find it very disappointing that our property will be devalued due to the increased traffic and noise which would have been allowed to happen just for the sake of a developer making money at our expense There are plenty of other brown sites across the town where 25 properties could be erected with no detriment to existing residents. The local police don't have resources to police the estate as it stands currently, and with the increasing crime in this area at the moment, the adding of further properties would put even more strain on an already stretched resource in this area There is already the plan in place for 3500 houses near this area to be constructed and so we cannot see the necessity or justification to build 25 houses to fill the last remaining green space, further reducing the air quality created by the increasing number of vehicles that are going to be present in this zone going forward. I therefore totally object to the building plans you have in place to cover this last bastion of healthy, green enjoyable space	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with Leicestershire Police on crime and safety. Where infrastructure is required this will be delivered by Leicestershire Police. Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/137 Ian Pepper	I write with extreme concern that the council are considering allowing the building of 25 dwellings on the land at the top of Leconfield Road. This land is the only green area remaining around this part of	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	estate and is the only refuge left for the foxes, badgers and other wildlife that live in the woods adjacent to the field. Especially now with plans to build the Science Park being given the go ahead to take up greenbelt from the other side of the wood. Also over the years, people have put hard standing at the front of their properties, removing grass and soil, which now leads to our side of the road becoming a river when we have heavy rain. If you allow building to take place on this area. You remove the last,	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological /

REPRESENTATION SUMMARY	OFFICER RESPONSE
large area of green belt with soakaway properties, which will mean that we will be exposed to higher levels of flooding every time it rains heavily. We are extremely concerned about this effect on our property. Our other concern is related to the high traffic volume this is going to create, as most properties now have at least two vehicles per property. We purchased our home, due to the quiet location, which would be greatly affected by the increase in traffic movement. We find it very disappointing that our property will be devalued due to the increased traffic and noise which would have been allowed to happen just for the sake of a developer making money at our expense There are plenty of other brown sites across the town where 25 properties could be erected with no detriment to existing residents. The local police don't have resources to police the estate as it stands currently, and with the increasing crime in this area at the moment, the adding of further properties would put even more strain on an already stretched resource in this area There is already the plan in place for 3500 houses near this area to be constructed and so we cannot see the necessity or justification to build 25 houses to fill the last remaining green space, further reducing the air quality created by the increasing number of vehicles that are going to be present in this zone going forward. I therefore totally object to the building plans you have in place to	 biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with Leicestershire Police on crime and safety. Where infrastructure is required this will be delivered by Leicestershire Police. Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. The land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
 I would like to object to HS33 and HS34 planning in the draft plan as this has already been refused in the past. I am a local resident [redacted] and think that building at HS33 is a bad thing for the environment and local people 1.The planning permission was refused in 1988 for HS33 (land off Leconfield Road) due to the high elevation of the land and the dominant effect new properties would have on those in the surrounding area, attachment included. The landscape has not changed in the last 30 years and there is no need to reconsider the site for potential development. 2. Planning permission was refused on 1988 for HS33 (land off Leconfield Road) due to the loss of privacy the new properties would have on those in the surrounding area. The landscape has not changed in the last 30 years and there is no need to reconsider the site for potential development. 3. The rating of landscape sensitivity in the Draft Local Plan should 	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment.
	 large area of green belt with soakaway properties, which will mean that we will be exposed to higher levels of flooding every time it rains heavily. We are extremely concerned about this effect on our property. Our other concern is related to the high traffic volume this is going to create, as most properties now have at least two vehicles per property. We purchased our home, due to the quiet location, which would be greatly affected by the increase in traffic movement. We find it very disappointing that our property will be devalued due to the increased traffic and noise which would have been allowed to happen just for the sake of a developer making money at our expense. There are plenty of other brown sites across the town where 25 properties could be erected with no detriment to existing residents. The local police don't have resources to police the estate as it stands currently, and with the increasing crime in this area at the moment, the adding of further properties would put even more strain on an already stretched resource in this area There is already the plan in place for 3500 houses near this area to be constructed and so we cannot see the necessity or justification to build 25 houses to fill the last remaining green space, further reducing the air quality created by the increasing number of vehicles that are going to be present in this zone going forward. I therefore totally object to the building plans you have in place to cover this last bastion of healthy, green enjoyable space I would like to object to HS33 and HS34 planning in the draft plan as this has already been refused in the past. I am a local resident [redacted] and think that building at HS33 is a bad thing for the environment and local people 1. The planning permission was refused in 1988 for HS33 (land off Leconfield Road) due to the high elevation of the land and the dominant effect new properties would have on those in the surrounding area, attachment included. The landscape has

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	 and beyond and any development will have a detrimental effect on the skyline of much of the town as well as dominating local housing leading to loss of privacy. 4. In the Draft Local Plan, the landscape sensitivity in of HS33 and HS34 should both be rated high. The fields can be seen easily from many parts of the local estate and indeed right across Loughborough. Any building on this land would adversely affect the views from Loughborough towards to the Charnwood Forest. 5. The reasons planning permission was refused in 1988 remain the same (ref: 88/25999/2). Any development would still affect the local skyline, dwellings in the vicinity would lose privacy and traffic flow would be adversely affected. 6. Planning permission was refused in 1988 with one reason being the effect on traffic flow. No significant improvements have been made to improve traffic flow since that time and so this reason for refusal must remain. 7. In 1999 when planning permission was refused partly due to its landscape, HS33 was bordered by Burleigh Wood and the same houses that are there today. Nothing substantial has changed and I see no reason why this field should be being reconsidered for development. Several families have moved to the area and Holywell School is already over subscribed and this would add more pressure to the catchment area of Holywell. 	The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/141 Dr Paul Lepper	HS33 I would like to express my concerns at the proposed inclusion of the field at the top of Leconfield Road in the Loughborough Draft Local Plan allowing the potential for housing development. This area boarders an area listed on the Leicestershire Inventory of Ancient Woodland (Burleigh Woods) and remains a vital diverse habitat in conjunction with this woodland to a wide variety of British wildlife. One example being listed birds of prey that are known to nest in the woodland are regularly seen hunting above this grass land. This area provides direct links to food for a wide variety of species and a vital wildlife corridor to he already identified importance of Burleigh Woods. The separation of these habitats importance are nonsensical in ecological terms and it is important for our wildlife that the field is given similar consideration to Burleigh Woods itself. The removal of this habitat would also further isolate Burleigh Woods from other woodlands designated the remainder of Charnwood Forest in an area that is significantly below standard	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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	practice for green space provision (1.4ha per 1000 people). Removal of this space in the Nanpantan area would further exacerbate an exist major shortfall in greenspace provision in this area. There has already been work done in conjunction with the	Landscape – The Council appreciates and values the work that has been carried out to prepare a revised landscape sensitivity assessment.
	Open Spaces Society to designate this space for inclusion Local Green Space designation for HS33 under the National Planning Framework published by the Department for Communities and	The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out.
	Local Government. Removal of this space from potential for housing development would allow this process to continue. This space is one if not last remaining open spaces in this ward and within a few meters of a major residential area potentially	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
	providing a much needed open space designation. Planning permission has previously been refused on the site for various reasons listed below I strongly believe that these justifications still stand.	Geology – The geology of this site will be investigated and used to inform the assessment
	Planning permission was refused in 1988 for HS33 (land off Leconfield Road) as 'the site's elevation and open nature make an important contribution to the character of the area and that a development of the site, due to its unique prominence within the immediate locality and also from wider parts of the town, would be substantially detrimental to that character thereby detrimental to the visual amonity of the area' (Defund of Dianaire Derminediate)	Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	visual amenity of the area' (Refusal of Planning Permission, 88/2599/2). In fact, the recent Landscape Sensitivity Assessment agrees, stating that 'development on these slopes [of HS33] may be out of keeping with the existing settlement pattern'. The local landscape has not changed in the last 30 years (HS33 is still bordered by the same properties and Burleigh Wood) and there is	
	no need to reconsider the site for potential development. Planning permission was refused on 1988 for HS33 (land off Leconfield Road) as 'A development on the site would be likely to dominate many of the dwellings in the vicinity of the site leading to	
	a loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the area' (Refusal of Planning Permission, 88/2599/2). In fact, the recent Landscape	
	Sensitivity Assessment [4] agrees, stating that 'development on these slopes [of HS33] may be out of keeping with the existing settlement pattern'. The local landscape has not changed in the last 30 years (HS33 is still bordered by the same properties and	
	Burleigh Wood) and there is no need to reconsider the site for potential development. Planning permission was refused in 1988 with one reason being	

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	the effect on traffic flow in the local area (Refusal of Planning Permission, 88/2599/2). No significant improvements have been made to improve traffic flow since that time and so this reason for refusal must remain. And finally I believe errors have been Landscape Sensitivity Assessment of the site. The comment on page 76 of the Landscape Sensitivity Assessment states that the site 'has low- moderate landscape sensitivity, as it is more closely associated with existing development and screened from the wider landscape by existing woodland'. This is incorrect. From most parts of HS33 there are wide and open views over much of Loughborough and across to the Wolds east of the town. A further indication that the Landscape Sensitivity Assessment has not been fully carried out is that it shows no pictures taken from or showing HS33. No one who visits the site and correctly records their observations can possibly say that the field is 'screened from the wider landscape by existing woodland'. The Landscape Sensitivity Assessment of HS33 is clearly flawed and the only reasonable action at this stage is to remove HS33 from the Draft Local Plan. For all of the reasons above I strongly believe that there is no firm justification for inclusion on this site in future housing development plans and significant advantage in protecting this site in its current form going forward.	
EDCLP/146 Woodland Trust	[See also general comments under Q8 above] Our concern is that several of the site allocations listed in your draft plan are adjacent to ancient woodland and may have adverse impacts on these woods and the wildlife within them. HS33 Land off Leconfield Road Loughborough Housing – 25 homes Adjacent to ancient woodland Burleigh Wood ASNW (grid ref SK5081117634) HS34 Land rear of Snell's Nook Lane Loughborough Housing – 120 homes Adjacent to ancient woodland Burleigh Wood ASNW (grid ref SK5081117634)	 Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation of data will be used in the further site assessment work. Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process.
EDCLP/250 Rebecca Beardsley Nineteen47 obo Helen Jean Cope	These representations are submitted jointly by The Helen Jean Cope Charity ('The Charity'), who are the freehold owners of land off Leconfield Road, Nanpantan, Loughborough, and Bowbridge Homes Limited, who have an option on the site and are actively looking to bring it forward for residential development. We enclose	The Council acknowledges the site layout plan. The evidence that the site can deliver 30 dwellings is noted. This is greater than the figure included in the draft local plan, and this information will be used to inform future assessment work.

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Charity & Bowbridge Homes	a site location plan showing the site edged in red, along with an illustrative masterplan showing how the site can be developed for approximately 30 dwellings.	The expression of interest process and decision to select a preferred developer is noted. Should the site be allocated in the local plan, the Council would expect to have further discussions with all partners to agree how the site could be delivered.
	In response to your letter dated 11th November 2019 inquiring whether the Trustees support this land, identified as a Housing site in proposed Policy LP3 of the draft Local Plan (described as site HS33), being considered further for residential development, we are writing to confirm our support for the allocation and provide the local planning authority with additional information about its deliverability.	The timetable for delivering the site is noted. This information will be used to inform the SHLAA.
	We are writing to advise you that the Charity does wish the site developed for housing and accordingly allocated as proposed in the emerging Local Plan for housing – it is suitable, available and achievable.	
	The site currently is situated within the limits to development for Loughborough and it has been the subject of formal pre-application submission to your Council. It is in a sustainable location for housing development with good public transport links into Loughborough and other retail, employment and leisure facilities the town offers. Axiomatically, the principle of residential development of the site is acceptable.	
	 We enclose for your information in support of and to inform the sites inclusion in the emerging Local Plan as a housing allocation the following [PDFs available]: 1. A copy of the formal Pre-Application submission made to your Council dated 25th October 2018; 2. A copy of the Illustrative Master Plan prepared by nineteen47 (Drawing Number n1249/007) demonstrating that the site can accommodate approximately 30 dwellings; 3. A copy of e-mail exchanges between Golby & Luck and the Charnwood Officer relating to the Pre-Application Submission during November/December 2018. 	
	On the basis of the above the Charity undertook an 'expression of interest' exercise with a number of chosen proven quality developers. From that exercise Bowbridge Homes Limited ('Bowbridge') were chosen as the preferred development partner for the site and an Option Agreement with that company has now	

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	been completed.	
	Bowbridge has now assembled a professional team to take forward the site for housing and further discussions with Officers of the Council regarding the proposals will be undertaken during Q1 of 2020. It is proposed that a detailed planning application will be made during 2020 with a view to an early commencement on site and the site being built out within the next three years.	
	 We concur with the Council's assessment of this site in terms of the draft policies and objectives of the emerging Local Plan, in that the site: 1. Accords with the Development Strategy for Charnwood to 2036 set out in draft Policy LP1; 2. Would deliver a high-quality designed housing development in accord with draft Policy LP2; and 3. Will meet the relevant criteria to bring forward housing sites as set out in draft Policy LP3 and should be allocated as proposed in that draft Policy; 4. Would deliver affordable housing in accord with draft Policy LP4, housing mix in accord with draft Policy LP6 and space standards as set out in draft Policy LP7; The development of this site would also accord with the relevant draft policies and their objectives regarding the Environment (Chapter 7), Climate Change (Chapter 8) and Infrastructure and Delivery (Chapter 9). To complete this response we wish to ensure the Council are 	
	 aware that the landowner is a Loughborough Charity, whose objectives are purely philanthropic for the good of the town. In terms of the Charity: The Helen Jean Cope Charity is named after Jean Cope, who inherited the estates of her grandfather Alan Moss and her mother, Annie Isobel (Nan) Cope; 	
	• Jean, who was unmarried died in 1993, leaving most of her estate to be distributed to charity. In this she was following in the footsteps of her mother and grandfather, who had both been considerable benefactors in their hometown, Loughborough. They are perhaps best remembered for their gift to the town of part of The Outwoods, followed by the gift of Jubilee Wood;	

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	 In 1998 the Charity Commissioners approved a scheme for distributing the assets of the estate, and since that time the Trustees have given almost £5million to charity. Following the pattern set by the Copes themselves, the Trustees make most of the grants to charities which are based in, or have a connection with the East Midlands, with preferences being given to applications which will benefit Leicestershire; The Helen Jean Cope Charity only makes grants to Registered Charities, usually to achieve specific objectives. Grants normally range in size between £500 and £5000, although we do make larger grants in some circumstances. The prefer applications to be from charities based in the East Midlands, but we do make grants to national charities where they can demonstrate that they will provide a benefit to our catchment area. Grants are usually made for specific purposes, and are rarely made to the same organisation two years in succession; Since its inception, The Helen Jean Cope Charity has helped schools, village halls, churches, playgroups, art festivals, and all manner of groups catering for the needs of young, the old, the disabled, the homeless and the sick. Bowbridge Homes are a small developer, focusing on delivering bespoke, high-quality developments. They develop new housetypes for each site they deliver, ensuring that they respect and are informed by local vernacular design, and are seeking to bring forward a scheme of arts and crafts-inspired properties on this site. We trust the above and the enclosed information provides sufficient information to support the Council's continued allocation of the site for approximately 30 dwellings, and look forward to continuing our discussions with you in 2020. 	
EDCLP/184 Mrs Naz Ali	I am a local resident in Nanpantan Road and I have received information about the above planning which I would like removed from the draft plan namely HS33 and HS34 for the following reasons. 1.The planning permission was refused in 1988 for HS33 (land off Leconfield Road) due to the high elevation of the land and the dominant effect new properties would have on those in the	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	surrounding area, attachment included. The landscape has not changed in the last 30 years and there is no need to reconsider the site for potential development. 541	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option

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	 Planning permission was refused on 1988 for HS33 (land off Leconfield Road) due to the loss of privacy the new properties would have on those in the surrounding area. The landscape has not changed in the last 30 years and there is no need to reconsider the site for potential development. The rating of landscape sensitivity in the Draft Local Plan should be high rather than moderate. The site overlooks Loughborough and beyond and any development will have a detrimental effect on the skyline of much of the town as well as dominating local housing leading to loss of privacy. In the Draft Local Plan, the landscape sensitivity in of HS33 and HS34 should both be rated high. The fields can be seen easily from many parts of the local estate and indeed right across Loughborough. Any building on this land would adversely affect the views from Loughborough towards to the Charnwood Forest. The reasons planning permission was refused in 1988 remain the same (ref: 88/25999/2). Any development would still affect the local skyline, dwellings in the vicinity would lose privacy and traffic flow would be adversely affected. Planning permission was refused in 1988 with one reason being the effect on traffic flow. No significant improvements have been made to improve traffic flow since that time and so this reason for refusal must remain. In 1999 when planning permission was refused partly due to its landscape, HS33 was bordered by Burleigh Wood and the same houses that are there today. Nothing substantial has changed and I see no reason why this field should be being reconsidered for development. [redacted] 	Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The Council appreciates and values the work that has been carried out to consider landscape issues. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process.
EDCLP/227 Peter Crown	With reference to the Draft Charnwood Local Plan (2019-36) Preferred Option, I would like to register my objection to the additional housing proposed for HS33 and HS34. In particular, in respect of HS34 I believe this will create a completely intolerable and dangerous situation at the junction of Snell's Nook Lane. As a Nanpantan resident living close to this junction the traffic conditions are already problematic at peak times. We are unable to leave our property as pedestrians without putting ourselves at risk. This junction urgently needs provision of a pedestrian crossing – bearing in mind there is residential property, a church, popular pub/restaurant, care home, and local walks into Charnwood (Nanpantan reservoir) all accessed at this junction. Crossing the road to access these is dangerous even now. Access to and from our property by vehicle is also difficult	 Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.

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	and at times dangerous. The noise (and pollution) generated from increased traffic constantly queueing (including frustrated drivers revving their engines) will make life for local residents miserable. This proposed development is not in keeping with the village location and will have a disproportionately negative impact on the local area from an environmental viewpoint - right on the edge of the Charnwood and National Forest. This green field site should be protected from further development. These same issues also apply to the proposed industrial development at the Ashby Road end of Snell's Nook Lane. Consideration should also be given to the preservation of the remnants of the Charnwood Forest Canal in this area – an important, but forgotten, local and national industrial heritage (and also the Ancient Earl's Dyke).	
EDCLP/235 T.Barton	I wish to respond to the local draft plan and in particular to HS33 (land off Leconfield Road) and HS34 (Snells Nook Lane). My main concerns are listed below.	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	When myself and my Husband first moved to Montague Drive in 2003, we were surrounded by 7 open fields. This has now been reduced to one, being HS33. This is the only field left! Being a two dog family, this only leaves us this field and Burleigh Wood to walk	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	in. I urge you to consider the points raised below to protect our green spaces for our future generations to enjoy.	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios,
	Planning permission was refused in 1988 for HS33 (land off Leconfield Road) as 'A development on the site would be likely to dominate many of the dwellings in the vicinity of the site leading to a loss of privacy and would be likely to breach the horizon as	and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the area' (Refusal of Planning Permission, 88/2599/2). In fact, the recent Landscape Sensitivity Assessment [4] agrees, stating that 'development on these slopes [of HS33] may be out of keeping with the existing	Landscape – The Council appreciates and values the work that has been carried out to consider landscape issues. The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out.
	settlement pattern'. The local landscape has not changed in the last 30 years (HS33 is still bordered by the same properties and Burleigh Wood) and there is no need to reconsider the site for potential development. In addition, I am sure you are aware that	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
	Charnwood has a geology that is internationally important, containing fossilised evidence of the earliest forms of multi-cellular life in Britain [17]. The rocky outcrops in this northern edge of the Charnwood Forest are formed of Cambrian rock, including the hill on HS33 [6]. I can't understand why any form of development could	

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	possibly be considered here. Please preserve this unique heritage of our Charnwood landscape by ensuing no form of construction takes place here.	
	In the Draft Local Plan, Section 3.4, an Environmental Objective is 'To protect the special and distinctive qualities of all landscapes, maintaining local distinctiveness and sense of place, and paying special attention to impacts on Charnwood Forest' [7]. The sites HS33 and HS34 identified in the Draft Local Plan are both in the Charnwood Forest. Surely 'paying special attention' to Charnwood Forest, does not mean new housing developments, particularly on land immediately bordering the ancient Burleigh Wood and in an elevated position visible across Loughborough?	
	The Draft Local Plan states that it will comply with the guidelines of the Charnwood Forest. The Leicestershire and Rutland Wildlife Trust oppose the isolation of woodland areas from the rest of the Forest. The development of HS33 and HS34 will isolate Burleigh Wood (and adjoining Holywell Wood) from the remainder of the Forest. Surely this is reason alone that Charnwood Borough Council should not allow HS33 and HS34 to be included the Local Plan? I am not sure the best interests of the conservation of the Charnwood Forest will be served by surrounding Burleigh Wood on all its four sides, as would happen if HS33 were developed. I accept there will be a narrow corridor to Holywell Wood to the north [13], but the site will become completely isolated from the main body of Charnwood Forest to the south. Three sides are covered by the Loughborough Science and Enterprise Park [13] (with one of these possibly becoming William Davis housing), but its isolation would be completed by developing HS33. It is most important that we protect the many flora and protected species, including Pipistrelle and Whiskered bats [14].	
	The housing development on the Garendon Estate, the planned hub near junction 23 and further development of the Loughborough University Science and Enterprise Park are continuing to bring substantial increases to the traffic along on Snells Nook Lane, particularly at peak times. Due to the close proximity of existing properties to the roads at the junction of Snells Nook Lane and Nanpantan Road, improvement here does not appear to be possible. The increase in noise and pollution brought about by an additional 250 extra cars (estimating two for each of	

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	the planned 125 new houses) feeding on to Snells Nook Lane will further deteriorate the wellbeing of those living close to an already severely overloaded road and junction. This makes it inappropriate to consider site HS34 any further and it should be removed from the Draft Local Plan.	
	Snells Nook Lane will provide the only access to the proposed HS34 development and is already heavily overloaded with traffic at peak times. This will become worse with the development of the University Science and Enterprise Park, the 3200 new houses on the Garendon Estate and the proposed 'hub' at junction 23 of the M1. I am afraid Snells Nook Lane can't take any more and HS34 should not be in the Local Plan. I use Snells Nook Lane every day to get to the M1 for my commute to/from work. The increase in traffic since the start of this development has increased and I'm sure the current roads would not cope with any further developments.	
	From the Assessment Study carried out by Nortoft Partnerships in 2017 [21], in the Nanpantan Ward there is an existing provision of 2.45ha of Amenity Green Spaces, Parks and Gardens for the population at that time of 5440. Given the standard in the Open Spaces Strategy is 1.4ha per 1000 people, this gives a shortfall of more than 5ha in the area [22]. There appears to be no provision for additional Green Space in the Draft Local Plan to cover the shortfall in Nanpantan [7]. Rather than the Draft Local Plan proposing housing developments on HS33 and HS34 which would only make the shortfall worse, surely these areas should instead be earmarked for addressing the shortfall and poor local access to Green Space? HS33 and HS34 are well placed in the centre of existing residential areas of the Ward, and so helping meet the target in the Open Spaces Strategy of residents being no more than 400m from Amenity Green Space [22]. We have started work supported by the Open Spaces Society [23] with a view to applying for a Local Green Space designation for HS33 under the National Planning Framework published by the Department for Communities	
	and Local Government. If HS33 could be marked in the Local Plan as a candidate for an Open Space this would help us in achieving this designation. It is clear that HS33 is already being used for local amenities, such as dog walking, accessing Burleigh Wood and we have had sufficient snow in recent winters for the hill to be used by hundreds of local children (and adults!) for sledging.	

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EDCLP/234 E.Barton	I wish to respond to the local draft plan and in particular to HS33 (land off Leconfield Road) and HS34 (Snells Nook Lane). My main concerns are listed below.	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
E.BallOli	concerns are listed below. When myself and my Husband first moved to Montague Drive in 2003, we were surrounded by 7 open fields. This has now been reduced to one, being HS33. This is the only field left! Being a two dog family, this only leaves us this field and Burleigh Wood to walk in. I urge you to consider the points raised below to protect our green spaces for our future generations to enjoy. Planning permission was refused in 1988 for HS33 (land off Leconfield Road) as 'A development on the site would be likely to dominate many of the dwellings in the vicinity of the site leading to a loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the area' (Refusal of Planning Permission, 88/2599/2). In fact, the recent Landscape Sensitivity Assessment [4] agrees, stating that 'development on these slopes [of HS33] may be out of keeping with the existing settlement pattern'. The local landscape has not changed in the last 30 years (HS33 is still bordered by the same properties and Burleigh Wood) and there is no need to reconsider the site for potential development. In addition, I am sure you are aware that Charnwood has a geology that is internationally important, containing fossilised evidence of the earliest forms of multi-cellular life in Britain [17]. The rocky outcrops in this northern edge of the Charnwood Forest are formed of Cambrian rock, including the hill on HS33 [6]. I can't understand why any form of development could	
	possibly be considered here. Please preserve this unique heritage of our Charnwood landscape by ensuing no form of construction takes place here. In the Draft Local Plan, Section 3.4, an Environmental Objective is 'To protect the special and distinctive qualities of all landscapes, maintaining local distinctiveness and sense of place, and paying special attention to impacts on Charnwood Forest' [7]. The sites HS33 and HS34 identified in the Draft Local Plan are both in the Charnwood Forest. Surely 'paying special attention' to Charnwood	
	Forest, does not mean new housing developments, particularly on land immediately bordering the ancient Burleigh Wood and in an elevated position visible across Loughborough?	

RESPO	NSE NO/
CONS	ULTEE

REPRESENTATION SUMMARY

The Draft Local Plan states that it will comply with the guidelines of the Charnwood Forest. The Leicestershire and Rutland Wildlife Trust oppose the isolation of woodland areas from the rest of the Forest. The development of HS33 and HS34 will isolate Burleigh Wood (and adjoining Holywell Wood) from the remainder of the Forest. Surely this is reason alone that Charnwood Borough Council should not allow HS33 and HS34 to be included the Local Plan? I am not sure the best interests of the conservation of the Charnwood Forest will be served by surrounding Burleigh Wood on all its four sides, as would happen if HS33 were developed. I accept there will be a narrow corridor to Holywell Wood to the north [13], but the site will become completely isolated from the main body of Charnwood Forest to the south. Three sides are covered by the Loughborough Science and Enterprise Park [13] (with one of these possibly becoming William Davis housing), but its isolation would be completed by developing HS33. It is most important that we protect the many flora and protected species, including Pipistrelle and Whiskered bats [14].

The housing development on the Garendon Estate, the planned hub near junction 23 and further development of the Loughborough University Science and Enterprise Park are continuing to bring substantial increases to the traffic along on Snells Nook Lane, particularly at peak times. Due to the close proximity of existing properties to the roads at the junction of Snells Nook Lane and Nanpantan Road, improvement here does not appear to be possible. The increase in noise and pollution brought about by an additional 250 extra cars (estimating two for each of the planned 125 new houses) feeding on to Snells Nook Lane will further deteriorate the wellbeing of those living close to an already severely overloaded road and junction. This makes it inappropriate to consider site HS34 any further and it should be removed from the Draft Local Plan.

Snells Nook Lane will provide the only access to the proposed HS34 development and is already heavily overloaded with traffic at peak times. This will become worse with the development of the University Science and Enterprise Park, the 3200 new houses on the Garendon Estate and the proposed 'hub' at junction 23 of the M1. I am afraid Snells Nook Lane can't take any more and HS34 should not be in the Local Plan. I use Snells Nook Lane every day

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	to get to the M1 for my commute to/from work. The increase in traffic since the start of this development has increased and I'm sure the current roads would not cope with any further developments.	
	From the Assessment Study carried out by Nortoft Partnerships in 2017 [21], in the Nanpantan Ward there is an existing provision of 2.45ha of Amenity Green Spaces, Parks and Gardens for the population at that time of 5440. Given the standard in the Open Spaces Strategy is 1.4ha per 1000 people, this gives a shortfall of more than 5ha in the area [22]. There appears to be no provision for additional Green Space in the Draft Local Plan to cover the shortfall in Nanpantan [7]. Rather than the Draft Local Plan proposing housing developments on HS33 and HS34 which would only make the shortfall worse, surely these areas should instead be earmarked for addressing the shortfall and poor local access to Green Space? HS33 and HS34 are well placed in the centre of existing residential areas of the Ward, and so helping meet the target in the Open Spaces Strategy of residents being no more than 400m from Amenity Green Space [22]. We have started work supported by the Open Spaces Society [23] with a view to applying for a Local Green Space designation for HS33 under the National Planning Framework published by the Department for Communities and Local Government. If HS33 could be marked in the Local Plan as a candidate for an Open Space this would help us in achieving this designation. It is clear that HS33 is already being used for local amenities, such as dog walking, accessing Burleigh Wood and we have had sufficient snow in recent winters for the hill to be used by	
EDCLP/229 A. Mitchell	 hundreds of local children (and adults!) for sledging. I would like to object to the above local plans. I live on Nanpantan Road and there is already too much traffic, and these developments would only add to that. Additionally, considering the planned developments around the 	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	A512 and Snell's Nook Lane, it is important to retain these green spaces. I believe the plans (or something very similar) have been rejected in the past for good reason, and the only thing that has changed since is that the roads have become busier, so I don't see the sense in submitting them a second time. Please register my opposition as a local resident, to this further reduction of green space in Charnwood.	 Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback

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	I write in reference to Draft Charnwood Local Plan (2019-36) regarding the Proposed Housing Allocations HS33, HS34 and HS36 off Nanpantan Road. I strongly feel opposed to such planning application being granted for this area. The Nanpantan Road is already experiencing increased traffic especially at peak times. This introduces further risk and impact to those in the community enjoying a walk to work/schools, due to the volume of traffic/pollution and noise from increased vehicles. This increase in traffic can have an influence on highway safety and potentially introduce parking issues in the neighborhood. With the proposal for additional housing in the area there is an increase of load on local schools, which already have an increased stress for student enrollments. Traffic during school drop off/pickup times already result in distress within the community, whereby schools are being contact by local residents. The risk of flooding in the area can also increase as a result of the new homes, we do not wish for drainage and flooding issues to be introduced into this area as a result of this development. We must ensure we are doing the right thing for this area and the community that resides here. The area is surrounded by woodlands, wildlife and is seen to be a natural place for locals to explore and visit with their families and friends. Such development in this area will	OFFICER RESPONSE and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space. Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC. Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1.
	ensure we are doing the right thing for this area and the community that resides here. The area is surrounded by woodlands, wildlife and is seen to be a natural place for locals to explore and visit with their families and friends. Such development in this area will detract visitors who marvel and comment on such a glorious natural	Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1.
	environment around the Nanpantan Road leading to the woodlands. This will impact our natural wildlife, which I also have concerns over. I would therefore like to conclude that I strongly oppose the	Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	planning application in reference to Proposed Housing Allocations	

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	HS33, HS34 and HS36.	
EDCLP/212 Jane Percival	 We object to the draft local plans inclusion of land off Leconfield Rd for housing for the following reasons. 1. This land is in very close proximity to Burleigh Wood which is an ancient woodland and supports a rich variety of wildlife including; badgers, bats, pheasants, deer, birds and a wide variety of wildflowers. We need to try our utmost to protect these valuable green spaces which are enjoyed by many local people and the students (dog walkers, runners, families). Currently there is a green space between the woodland and the surrounding houses 	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option
	which helps to protect the wood and the wildlife. The steady encroachment of housing towards the boundaries of this wood would no doubt have an adverse effect upon the quality of this woodland.	Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	2. Further the contours of the land off Leconfield Road are such that because of the high slope of the land, water run off is possibly going to affect the existing housing on Tynedale Road, Montague Drive and Leconfield Road. In addition, the land is very stoney with heavy clay soil, making it more likely that the water will run off in	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Infrastructure – The impact of the development in terms of infrastructure
	the direction of the existing housing.3. The proposed allocation of this land for development will increase the traffic using the roads around the local school,	requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC.
	Holywell County Primary, which is already heavily congested. This will Lead to increased congestion at the junction of Thirlmere Road and Nanpantan Road leading to even more traffic on Snells Nook Lane and adverse effects on air quality around the school.	Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	4. Given the developments allowed to take place on Snell's Nook Lane, which are upmarket luxury houses, this seems to suggest that the proposed use of land off Leconfield Road is not going to be used for affordable housing which is one of the main priorities of the Local Plan. The proposed development of the land off Leconfield Road therefore does not appear to meet the main objective of the Local Plan.	Draft Local Plan Policy 4 and Draft Local Plan Policy 6 would ensure that any future development would deliver both affordable housing; and housing of the appropriate mix of tenure and type.
EDCLP/171 N.Millwood	May I take this opportunity to contribute some comments related to areas HS33 and HS34 on your Draft Local Plan. I would like to put forward two arguments against the proposal to	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and

ESPONSE NO/ REPRESENTATION SUMMARY	OFFICER RESPONSE
	previous planning refusal. Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Draft Local Plan Policy 4 and Draft Local Plan Policy 6 would ensure that any future development would deliver both affordable housing; and housing of the appropriate mix of tenure and type.

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	numbers of one-person households in Charnwood. The Office of National Statistics predicts that the number of one-person households in England is projected to increase by 26% by 2041, driven by increases at older ages.	
	In my opinion, the real need is for more two-bedroom houses/flats suitable for elderly people who are still able to live independently. These properties need to be situated close to local amenities, and not on hilly terrain.	
	If permission were to be granted for house building on HS33 and HS34, the kind of properties likely to be built would be larger, family-type homes in keeping with other properties in the nearby area. The number of households with	
	dependent children is projected to remain broadly similar between 2016 and 2041, with around a quarter of households having dependent children by 2041. So, I cannot see why there should be a	
	demand for new-build family homes. I don't know what the life expectancy of a modern, new-build house is, but we have to consider what the housing stock is going to look like in 50 years time. My concern is that in 50 years time we will have an over-supply of housing, which we will	
	need to demolish. I trust that you will be able to take these considerations into account when making your decisions about the Local Plan for our neighbourhood.	
EDCLP/159 C.Mulvaney	Sites HS33 and HS34 should be removed from the plan. There are a number of reasons for this:	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	1. These 2 sites border Burleigh Wood, an ancient wood that forms part of Charnwood Forest. If these 2 sites are developed, Burleigh Wood will be surrounded by development with detrimental effects on the flora and fauna. The detrimental effects would result not just from the disruption caused during development of the sites	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal.
	but once the development is complete too with the potential for 552	Ancient Woodland - It Is recognised that the site is adjacent to adjacent

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	harmful runoffs into the brooks and the negative effects of light pollution and noise.	woodland, and this confirmation of data will be used in the further site assessment work.
	2. By developing these 2 sites, Burleigh Wood would become isolated from the remainder of the Charnwood Forest. This would prevent the current movement of animals and wildlife from Burleigh Wood across to The Outwoods with a subsequent detrimental	Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site.
	effect to species we see such as pheasants, foxes, muntjac and badgers and birds we hear such as tawny and barn owl.	Geology – The geology of this site will be investigated and used to inform the assessment
	 Burleigh Wood, as part of Charnwood Forest, shares its international heritage. The rocky outcrops of the Charnwood Forest are formed of Cambrian rock and is where Charnia masoni was found, the first pre Cambrian fossil to be found. Site HS33 is undoubtedly Cambrian rock, possibly pre-Cambrian. Similar areas in Canada (http://www.ediacaran.org/newfoundland-canada.html) and Australia (http://www.ediacaran.org/flinders-ranges-south- australia.html) are protected, indeed the site in Canada is a world UNESCO heritage site. Given the potential significance of the land on HS33, this site should be protected and certainly should not be destroyed which is what would happen if the land was developed. The Council proposes a total of 145 houses on these 2 sites. I propose that by adjusting other, larger sites, provision for 145 houses could be found elsewhere in the Plan. Planning permission to build on HS33 was sought in 1988. 	Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	When permission was refused the decision stated "the site constitutes a portion of elevated land surrounded on three sides by existing residential development and on its fourth side by Burleigh	
	Wood, an area of ancient woodland of district level significance. The site lies on the border of the Charnwood Forest and are of particularly attractive landscape. It is steeply sloping in part". The significance, attractiveness and topology of the site has not	
	changed. Permission was refused partly because a development on the site "would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the	
	residential amenity of the area". Standing on top of the steeply sloping land, viewers can see across Loughborough and beyond to the Wolds, and thus any development could potentially be viewed	
	from many parts of Loughborough and from residents in the Wolds.	

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	The potential impact of any development would thus be significant and far-reaching.	
	6. HS33 and HS34 are the last remaining open spaces around Burleigh Wood and Snell's Nook Lane, once the development of the Loughborough University Science and Enterprise Park and the proposed Wilson-Bowden are complete. Open spaces are necessary for our physical and mental health. The elevation of HS33, as described in 6 above, is what makes this piece of open space particularly attractive to walkers. To stand at the top of the steeply sloping land and to look across Loughborough towards the Wolds is immensely satisfying and encourages walkers to stop, look, enjoy and thus has mental health benefits. I propose that these 2 sites are designated as open spaces and that the Council take steps to ensure that these sites remain as open spaces in perpetuity.	
	7. HS33 and HS34 could be designated as areas where tree planting could occur (see question 28).	
EDCLP/154 Mr St Denis	I would like to formally object to the planning permission and development of the HS33/34 of chapter 5 page 52 map on page 148 of the draft local plan.	Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	As a local resident this will further ruin the local green areas and generate additional traffic to the estate. Building work in the local area thus far appears to be poor quality/ cheap builds - the land located at the top of Leconfield road surely can not accommodate the total amount of houses all cramped on the site to look nothing more than social engineered project.	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
DCLP-264 LCC - Education	Loughborough Primary Schools There are 14 primary schools in Loughborough of which only 3 have some potential to expand but not by the 579 places required by these developments. Therefore, a new school would be required preferably in the South of Loughborough. Loughborough Secondary Schools Capacity and scope to expand schools in the Loughborough area.	Infrastructure – The impact of the development in terms of infrastructure requirements has been considered as part of the IDP. The Council continues to liaise with LCC on education matters. Where infrastructure is required this will be delivered by LCC.
EDCLP/235 T.Barton	I wish to respond to the local draft plan and in particular to HS33 (land off Leconfield Road) and HS34 (Snells Nook Lane). My main concerns are listed below.	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.
	When myself and my Husband first moved to Montague Drive in 2003, we were surrounded by 7 open fields. This has now been 554	Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation

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	reduced to one, being HS33. This is the only field left! Being a two dog family, this only leaves us this field and Burleigh Wood to walk in. I urge you to consider the points raised below to protect our green spaces for our future generations to enjoy. Planning permission was refused in 1988 for HS33 (land off Leconfield Road) as 'A development on the site would be likely to dominate many of the dwellings in the vicinity of the site leading to a loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the area' (Refusal of Planning Permission, 88/2599/2). In fact, the recent Landscape Sensitivity Assessment [4] agrees, stating that 'development on these slopes [of HS33] may be out of keeping with the existing settlement pattern'. The local landscape has not changed in the last 30 years (HS33 is still bordered by the same properties and Burleigh Wood) and there is no need to reconsider the site for potential development. In addition, I am sure you are aware that Charnwood has a geology that is internationally important, containing fossilised evidence of the earliest forms of multi-cellular life in Britain [17]. The rocky outcrops in this northern edge of the Charnwood Forest are formed of Cambrian rock, including the hill on HS33 [6]. I can't understand why any form of development could possibly be considered here. Please preserve this unique heritage of our Charnwood landscape by ensuing no form of construction takes place here. In the Draft Local Plan, Section 3.4, an Environmental Objective is 'To protect the special and distinctive qualities of all landscapes, maintaining local distinctiveness and sense of place, and paying special attention to impacts on Charnwood Forest' [7]. The sites HS33 and HS34 identified in the Draft Local Plan are both in the Charnwood Forest. Surely 'paying special attention' to Charnwood Forest, does not mean new housing developments, particularly on land immediately borde	and previous planning refusal. Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation will be used in the further site assessment work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.

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	Forest. Surely this is reason alone that Charnwood Borough Council should not allow HS33 and HS34 to be included the Local Plan? I am not sure the best interests of the conservation of the Charnwood Forest will be served by surrounding Burleigh Wood on all its four sides, as would happen if HS33 were developed. I accept there will be a narrow corridor to Holywell Wood to the north [13], but the site will become completely isolated from the main body of Charnwood Forest to the south. Three sides are covered by the Loughborough Science and Enterprise Park [13] (with one of these possibly becoming William Davis housing), but its isolation would be completed by developing HS33. It is most important that we protect the many flora and protected species, including Pipistrelle and Whiskered bats [14].	
	The housing development on the Garendon Estate, the planned hub near junction 23 and further development of the Loughborough University Science and Enterprise Park are continuing to bring substantial increases to the traffic along on Snells Nook Lane, particularly at peak times. Due to the close proximity of existing properties to the roads at the junction of Snells Nook Lane and Nanpantan Road, improvement here does not appear to be possible. The increase in noise and pollution brought about by an additional 250 extra cars (estimating two for each of the planned 125 new houses) feeding on to Snells Nook Lane will further deteriorate the wellbeing of those living close to an already severely overloaded road and junction. This makes it inappropriate to consider site HS34 any further and it should be removed from the Draft Local Plan.	
	Snells Nook Lane will provide the only access to the proposed HS34 development and is already heavily overloaded with traffic at peak times. This will become worse with the development of the University Science and Enterprise Park, the 3200 new houses on the Garendon Estate and the proposed 'hub' at junction 23 of the M1. I am afraid Snells Nook Lane can't take any more and HS34 should not be in the Local Plan. I use Snells Nook Lane every day to get to the M1 for my commute to/from work. The increase in traffic since the start of this development has increased and I'm sure the current roads would not cope with any further developments.	

From the Assessment Study carried out by Nortoft Partnerships in

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	2017 [21], in the Nanpantan Ward there is an existing provision of 2.45ha of Amenity Green Spaces, Parks and Gardens for the population at that time of 5440. Given the standard in the Open Spaces Strategy is 1.4ha per 1000 people, this gives a shortfall of more than 5ha in the area [22]. There appears to be no provision for additional Green Space in the Draft Local Plan to cover the shortfall in Nanpantan [7]. Rather than the Draft Local Plan proposing housing developments on HS33 and HS34 which would only make the shortfall worse, surely these areas should instead be earmarked for addressing the shortfall and poor local access to Green Space? HS33 and HS34 are well placed in the centre of existing residential areas of the Ward, and so helping meet the target in the Open Spaces Strategy of residents being no more than 400m from Amenity Green Space [22]. We have started work supported by the Open Spaces Society [23] with a view to applying for a Local Green Space designation for HS33 under the National Planning Framework published by the Department for Communities and Local Government. If HS33 could be marked in the Local Plan as a candidate for an Open Space this would help us in achieving this designation. It is clear that HS33 is already being used for local amenities, such as dog walking, accessing Burleigh Wood and we have had sufficient snow in recent winters for the hill to be used by hundreds of local children (and adults!) for sledging.	
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The housing development on the Garendon Estate, the planned hub near junction 23 and further development of the Loughborough University Science and Enterprise Park are continuing to bring substantial increases to the traffic along on Snells Nook Lane, particularly at peak times. Due to the close proximity of existing properties to the roads at the junction of Snells Nook Lane and Nanpantan Road, improvement here does not appear to be possible. The increase in noise and pollution brought about by an additional 250 extra cars (estimating two for each of the planned 125 new houses) feeding on to Snells Nook Lane will further deteriorate the wellbeing of those living close to an already severely overloaded road and junction. This makes it inappropriate to consider site HS34 any further and it should be removed from the Draft Local Plan.

Snells Nook Lane will provide the only access to the proposed HS34 development and is already heavily overloaded with traffic at peak times. This will become worse with the development of the University Science and Enterprise Park, the 3200 new houses on the Garendon Estate and the proposed 'hub' at junction 23 of the M1. I am afraid Snells Nook Lane can't take any more and HS34 should not be in the Local Plan. I use Snells Nook Lane every day to get to the M1 for my commute to/from work. The increase in traffic since the start of this development has increased and I'm sure the current roads would not cope with any further developments.

From the Assessment Study carried out by Nortoft Partnerships in 2017 [21], in the Nanpantan Ward there is an existing provision of 2.45ha of Amenity Green Spaces, Parks and Gardens for the population at that time of 5440. Given the standard in the Open Spaces Strategy is 1.4ha per 1000 people, this gives a shortfall of more than 5ha in the area [22]. There appears to be no provision for additional Green Space in the Draft Local Plan to cover the shortfall in Nanpantan [7]. Rather than the Draft Local Plan proposing housing developments on HS33 and HS34 which would only make the shortfall worse, surely these areas should instead be earmarked for addressing the shortfall and poor local access to Green Space? HS33 and HS34 are well placed in the centre of existing residential areas of the Ward, and so helping meet the target in the Open Spaces Strategy of residents being no more

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	than 400m from Amenity Green Space [22]. We have started work supported by the Open Spaces Society [23] with a view to applying for a Local Green Space designation for HS33 under the National Planning Framework published by the Department for Communities and Local Government. If HS33 could be marked in the Local Plan as a candidate for an Open Space this would help us in achieving this designation. It is clear that HS33 is already being used for local amenities, such as dog walking, accessing Burleigh Wood and we have had sufficient snow in recent winters for the hill to be used by hundreds of local children (and adults!) for sledging.	
EDCLP/229 A. Mitchell	I would like to object to the above local plans. I live on Nanpantan Road and there is already too much traffic, and these developments would only add to that. Additionally, considering the planned developments around the A512 and Snell's Nook Lane, it is important to retain these green spaces. I believe the plans (or something very similar) have been rejected in the past for good reason, and the only thing that has changed since is that the roads have become busier, so I don't see the sense in submitting them a second time. Please register my opposition as a local resident, to this further reduction of green space in Charnwood.	 Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback
EDCLP/220 P.Patel	I write in reference to Draft Charnwood Local Plan (2019-36) regarding the Proposed Housing Allocations HS33, HS34 and HS36 off Nanpantan Road. I strongly feel opposed to such planning application being granted for this area. The Nanpantan Road is already experiencing increased traffic especially at peak times. This introduces further risk and impact to those in the community enjoying a walk to work/schools, due to the volume of traffic/pollution and noise from increased vehicles. This increase in traffic can have an influence on highway safety and potentially introduce parking issues in the neighborhood.	 and information from this response will be included in the work. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Flood risk – the site selection work has assessed and considered the level of flood risk for the sites. Th land at HS33 is predominantly in Flood Risk Zone 1, and the land HS34 is predominantly in Flood Risk Zone 1. Infrastructure – The impact of the development in terms of infrastructure
	With the proposal for additional housing in the area there is an increase of load on local schools, which already have an increased stress for student enrollments. Traffic during school drop off/pickup times already result in distress within the community, whereby 560	requirements has been considered as part of the IDP. The Council wishes to liaise with LCC on education matters, to confirm the quantum of need, analyse any shortfalls in capacity, and to agree any

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	schools are being contact by local residents.	solutions.
	The risk of flooding in the area can also increase as a result of the new homes, we do not wish for drainage and flooding issues to be introduced into this area as a result of this development. We must ensure we are doing the right thing for this area and the community that resides here. The area is surrounded by woodlands, wildlife and is seen to be a natural place for locals to explore and visit with their families and friends. Such development in this area will detract visitors who marvel and comment on such a glorious natural environment around the Nanpantan Road leading to the woodlands. This will impact our natural wildlife, which I also have concerns over.	
	I would therefore like to conclude that I strongly oppose the planning application in reference to Proposed Housing Allocations HS33, HS34 and HS36.	
ELDCP/171 N.Millwood	May I take this opportunity to contribute some comments related to areas HS33 and HS34 on your Draft Local Plan. I would like to put forward two arguments against the proposal to allocate these two portions of land for future housing development, namely: 1. Loss of buffer zone around Burleigh Woods 2. Housing stock – The need for small 2-bedroom houses/flats suitable for elderly people 1. Loss of buffer zone around Burleigh Woods I think it is fair to say that the Burleigh Woods are special and need to be protected. Building too close to the woods will choke off and kill the flora and fauna. The increased number of houses around the woods inevitably means more cats and dogs, which will frequent the woods placing additional pressure on the ecology. Indeed, I would say that my street is too close to the woods, but our houses are here now and it is difficult to turn back the clock. However, we do have an opportunity to restrict further developments around the perimeter of the woods. 2. Housing stock – The need for small 2-bedroom houses/flats suitable for elderly people In the media we hear a constant clamour about a 'housing crisis', which is usually taken to mean a shortage	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Ancient Woodland - It Is recognised that the site is adjacent to adjacent woodland, and this confirmation will be used in the further site assessment work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option
	of housing stock. There are many complex arguments, but one which is seldom cited is the household occupancy rate, or 'household size', which has been decreasing over a number of 561	Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback

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	 years. For Charnwood, the average household size from the 2001 census was 2.42. I haven't had time to check the corresponding figure for the 2011 census, but I very much doubt that this has increased. My observation is that there are many three, four and five-bedroom family houses in our neighbourhood which have only one person living there. Usually, these are elderly people who have lived in their property for several years. I haven't had time to check the current numbers of one-person households in Charnwood. The Office of National Statistics predicts that the number of one-person households in England is projected to increase by 26% by 2041, driven by increases at older ages. In my opinion, the real need is for more two-bedroom houses/flats suitable for elderly people who are still able to live independently. These properties need to be situated close to local amenities, and not on hilly terrain. If permission were to be granted for house building on HS33 and HS34, the kind of properties likely to be built would be larger, family-type homes in keeping with other properties in the nearby area. The number of households with dependent children is projected to remain broadly similar between 2016 and 2041, with around a quarter of households having dependent children by 2041. So, I cannot see why there should be a demand for newbuild family homes. I don't know what the life expectancy of a modern, new-build house is, but we have to consider what the housing stock is going to look like in 50 years time. My concern is that in 50 years time we will have an over-supply of housing, which we will need to demolish. I trust that you will be able to take these considerations into account when making your decisions about the Local Plan for our neighbourhood. 	and information from this response will be included in the work. Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
EDCLP/ 249 Mrs Travadi	HS33 in particular is full of rock, its a type of ancient Cambrian Volcanic rock which is similar to the rock found in Beacon Hill and Outwoods, it can be shown here from the British Geological Society (BGS) <u>http://www.largeimages.bgs.ac.uk/iip/mapsportal.html?id=1</u> <u>001634</u> . The Landscape Partnership Scheme states that, 'The Charnwood Forest Landscape Partnership Scheme will celebrate the area's internationally important volcanic legacy'. Building on a site formed of volcanic rock in the Charnwood Forest does not 'celebrate the area's internationally important volcanic legacy' and	 Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal. Prominence / Visual Impact - Site selection was informed by landscape and visual assessments, but will be reviewed in light of representation and previous planning refusal. Ancient Woodland - It Is recognised that the site is adjacent to adjacent

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	the site must surely not make it to the Local Plan for any purpose other than protection from development.	woodland, and this confirmation of data will be used in the further site assessment work.
	The field at the top of Leconfield Road (HS33) borders Burleigh Wood, an area listed on the Leicestershire Inventory of Ancient Woodland. I am afraid the Wood's wildlife and ecology will be irreparably damaged by the proposed housing development. Loughborough University has a 'Woodland Management Plan' for Burleigh Wood https://www.lboro.ac.uk/media/wwwlboroacuk/content/sustainability /downloads/woodland_management_plan_v2.pdf hat proposes the development of 'transitional habitats' to protect the wood and has added 1.2 hectares as a buffer for wildlife and ecology. Surely, the Council should aim to do the same on the 1.4 hectares currently planned for housing and stop the Wood becoming isolated from the rest of Charnwood Forest to the south? As part of the environment strategy, the Draft Local Plan says in Section 7.32 that 'Charnwood Forest is recognised as having high value for wildlife because of the quality of existing habitats' and in Section 7.31 that 'we must manage our natural environment to limit damage and habitat fragmentation'. Is the Council just paying lip service to good sounding ideals, or will it take them seriously and remove the site from its Plan?	 Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Landscape – The material and evidence presented in the response will be considered as part of the additional landscape sensitivity assessment work that is being carried out. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Geology – The geology of this site will be investigated and used to inform the assessment Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	HS33 and HS34 The Draft Local Plan states that it will comply with the guidelines of the Charnwood Forest. Section 7.20 of the Draft Local Plan [7] says it will support the objectives of the 'Landscape Partnership Scheme'. The Landscape Partnership Scheme <u>https://www.lrwt.org.uk/our-work-for-wildlife/living-</u> <u>landscapes/charnwood-forest-living-landscape-project/</u> states that 'Charnwood Forest contains a high concentration of Sites of Special Scientific Interest and Local Wildlife Sites, but these places have become increasingly isolated by activities such as hedge removal, ploughing of grasslands, development and road building'. The development of HS33 and HS34 will isolate Burleigh Wood (and adjoining Holywell Wood) from the remainder of the Forest. Surely this is reason alone that Charnwood Borough Council should not allow HS33 and HS34 to be included the Local Plan? HS33 and HS34 - From the Assessment Study carried out by Nortoft Partnerships in 2017 (attached in pdf), in the Nanpantan Ward there is an existing provision of 2.45ha of Amenity Green Spaces, Parks and Gardens for the population at that time of 5440.	

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	Given the standard in the Open Spaces Strategy is 1.4ha per 1000	
	people, this gives a shortfall of more than 5ha in the area(attached	
	in pdf). There appears to be no provision for additional Green	
	Space in the Draft Local Plan to cover the shortfall in Nanpantan.	
	Rather than the Draft Local Plan proposing housing developments	
	on HS33 and HS34 which would only make the shortfall worse,	
	surely these areas should instead be earmarked for addressing the	
	shortfall and poor local access to Green Space? HS33 and HS34 are well placed in the centre of existing residential areas of the	
	Ward, and so helping meet the target in the Open Spaces Strategy	
	of residents being no more than 400m from Amenity Green Space	
	https://www.oss.org.uk/faqs-about-local-green-space-designation/.	
	HS33 We have started work supported by the Open Spaces	
	Society with a view to applying for a Local Green Space	
	designation for HS33 under the National Planning Framework	
	published by the Department for Communities and Local	
	Government. If HS33 could be marked in the Local Plan as a	
	candidate for an Open Space this would help us in achieving this	
	designation. It is clear that HS33 is already being used for local	
	amenities, such as dog walking, accessing Burleigh Wood and we	
	have had sufficient snow in recent winters for the hill to be used by	
	hundreds of local children (and adults!) for sledging.	
	HS33 The Draft Local Plan Interim Sustainability Appraisal Report	
	contains a rather sad statement on page 98 that HS33 is 'the last	
	area of open green space in the area'. Hopefully this says enough	
	by itself. In case it doesn't, remember that HS33 is in the centre of	
	the Napantanan Ward and so would efficiently provide green space	
	to residents, noting that the Ward has less than a third of the Green	
	Space specified in the Open Spaces Strategy and it is already	
	planned that we will be surrounded by the housing development on	
	the Garendon Estate and the Loughborough University Science	
	and Enterprise Park towards Snells Nook Lane and soon beyond.	
	Please can we keep our 'last area of open green space in the area'?	
	HS33 and HS34 - Nanpantan Ward is bordered by Nanpantan	
	Road to the south and Snells Nook Lane runs through its western	
	side. These roads and their junction are often overwhelmed by	
	vehicles at peak times. Soon to the north will be added the housing	
	development on the Garendon Estate and the further developments	
	on the Loughborough University Science and Enterprise Park	
	towards Snells Nook Lane and beyond. There have also been	
	three housing developments along Snells Nook Lane in recent	

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	years. We are in the Charnwood Forest, yet our Ward is being covered by concrete. Surely HS33 and HS34 as the only Open Spaces we have left must remain to give the area some lungs to provide protection against all the additional pollution these developments will bring? HS33 Planning permission was refused in 1988 for HS33 (land off Leconfield Road) as 'the site's elevation and open nature make an important contribution to the character of the area and that a development of the site, due to its unique prominence within the immediate locality and also from wider parts of the town, would be substantially detrimental to that character thereby detrimental to the visual amenity of the area' (Refusal of Planning Permission, 88/2599/2). In fact, the recent Landscape Sensitivity Assessment agrees, stating that 'development on these slopes [of HS33] may be out of keeping with the existing settlement pattern'. The local landscape has not changed in the last 30 years (HS33 is still bordered by the same properties and Burleigh Wood) and there is no need to reconsider the site for potential development. Planning permission was refused on 1988 for HS33 (land off Leconfield Road) as 'A development on the site would be likely to dominate many of the dwellings in the vicinity of the site leading to a loss of privacy and would be likely to breach the horizon as viewed from the majority of nearby dwellings which would be detrimental to the residential amenity of the area' (Refusal of Planning Permission, 88/2599/2). In fact, the recent Landscape Sensitivity Assessment agrees, stating that 'development on these slopes [of HS33] may be out of keeping with the existing settlement pattern'. The local landscape has not changed in the last 30 years	
	(HS33 is still bordered by the same properties and Burleigh Wood) and there is no need to reconsider the site for potential development.	
	Planning permission was refused in 1988 with one reason being the effect on traffic flow in the local area (Refusal of Planning Permission, 88/2599/2). No significant improvements have been made to improve traffic flow since that time and so this reason for refusal must remain.	
	10. The comment on page 76 of the Landscape Sensitivity Assessment states that the site 'has low-moderate landscape	

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	 sensitivity, as it is more closely associated with existing development and screened from the wider landscape by existing woodland'. This is incorrect. From most parts of HS33 there are wide and open views over much of Loughborough and across to the Wolds east of the town. A further indication that the Landscape Sensitivity Assessment has not been fully carried out is that it shows no pictures taken from or showing HS33. We can provide these. Here is a picture looking east from HS33 and here is a video from the middle of HS33. No one who visits the site and correctly records their observations can possibly say that the field is 'screened from the wider landscape by existing woodland'. The Landscape Sensitivity Assessment of HS33 is clearly flawed and the only reasonable action at this stage is to remove HS33 from the Draft Local Plan. HS33 and HS34 Finally many local residents are aware of a house being built by William Davis at the top of Leconfield Road, this site is being built by one of the William Davis Accountants by William Davis staff at weekends and is now 7 years being built. This has disturbed local families and it is rumoured that this is a corrupt build by William Davis as they have the right to but the land on HS33 and HS34. This sort of business ethics puts profit before people and should not be tolerated in the area, this is a pleasant area which will be spoilt by the profit for a few. 	
EDCLP/ 245 Avison Young obo Loughborough University	HS 33 and HS34 The University has no objection in principle to any of the Plan's draft housing allocations. However, it notes that draft housing allocations HS33 and HS34 lies adjacent to Burleigh Woods – an Ancient Woodland. These woods are owned by the University and form part of its Biodiversity Action Plan. They are also covered by the associated Ecological Management Plan. The University would therefore be keen to ensure that the local planning authority takes the necessary and appropriate steps to ensure that any development which takes place on sites HS33 and 34 would be sympathetic to, and have regard to, the close proximity of this ancient woodland. The University also hopes that the Local Authority will take into account any adverse impacts on the ecology value of the woodlands and the adjacent University controlled land, as well any harm that might arise in terms of loss of or harm to connectivity of habitats etc. when applications for planning permission for residential development on these sites eventually comes forward. As the Local Authority will be aware, the University has devoted a	 The Council acknowledges the University as the adjacent landowner. The information in the University's Biodiversity Action Plan and the associated Ecological Management Plan will be used to inform further site assessment work, and update the SHLAA (where necessary). Specific further landscape, ecology and transport work is being carried out – and the Council will include this information in those additional studies. Buffer to Burleigh Wood - If the site is allocated as part of the local plan, then Policy LP3 makes provision for the careful planning of the site, and it would be expected that any buffer and/or transitional arrangement between the wood and the development site, would be confirmed through the Development Management process.

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	significant amount of time and resource to the development of an Ecological Management Plan for its Science and Enterprise Park (copy enclosed). This document confirms how it would expect buffers to be created adjacent to the historic woodlands and sets out how buffers between built development to woodlands, hedgerows and watercourses should be managed and maintained in the future. The University would expect development proposals on the opposite side of the woodland to accord with these principles, or adopt a similar approach also.	
	The University's Ecological Management Plan has plan has been written to conform with statutory legislation that requires that 'buffers' are provided around statutory constraints so as to protect and preserve them from the impacts of new development. So these, in effect, become 'mandatory' and 'obligatory' requirements of the Plan. The mandatory areas for protection are identified on the Levels 1&2 plan, also attached.	
	Other policies of the draft plan refer to connectivity in the landscape and so the University's aim will be to ensure that its own development proposals maintain this as much as possible and enhance it where practicable. The Ecological Management Plan contains detail about the different types of habitats within and adjacent to the site and how the University intends to put in place measures to protect and enhance them alongside any development. For example, within the 15 metre buffer zone to the woodland boundary the University is proposing to create a "Thesis Forest". This will be involve planting trees each year for every PhD student that has completed their Doctorate. Trees will be planted within this buffer zone and incorporated as per the schematic attached.	
	Taking the above into account, the University is extremely keen to ensure that neither of the draft housing allocations would (a) give rise to any adverse impacts on the adjacent historic woodland; and, (b) prevent it from implementing any of the initiatives described above through either direct or indirect impacts.	
EDCLP/211 Cllr Margaret Smidowicz	Q 5 Housing: Sites allocated to housing LP3 I believe there are mixed messages within this section. Sites allocated to housing: Whilst I have concerns about the Town	Overall - The Council has appraised the sites through the Strategic Housing Land Availability Assessment, and subsequently through the Sustainability Appraisal.

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CONSULTEE	Centre surrounded by the high- rise effect of multiple blocks, if the external facades are retained and continue to provide us with some awareness of our heritage then I would support the conversion of apartments above shops. Many existing apartments are already let with concerns raised by some shopkeepers that rubbish from them is 'dumped' at the back of shops. Parking, waste management and general access by emergency vehicles needs also to be considered. CBC maintains that " <i>Our communities will have access to a range of green spaces, leisure and recreational facilities across Charnwood. We want well designed places that take into account people's well-being and encourage walking and cycling as physically active modes of transport, and enable people to have convenient access to open spaces and other facilities for active recreation and play, the natural environment and health care." and "adjacent to the Charnwood Forest Regional Park.</i> Code HS33 Leconfield Road In relation to the above objective, this piece of land has been used by a farmer until recently, it is a hidden gem. It is the only piece of open space available to the residents within the ward and used by walkers and families through to Burleigh Wood and green unspoilt general area. The terrain lends itself to individuals and family walks and in winter sledging with families from the community meeting together. Recent research has been undertaken by residents and is available for planning officers to consider. This is not a 'not in my backyard' position but a valid concern against a '25 plus could fit here approach' which adds nothing to the environment and health and wellbeing of the community. It is on the edge of the Charnwood Forest area.	 Prominence / Visual Impact - Site selection was informed by landscape and visual assessments. Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Ecology / Biodiversity – Site selection was informed by ecological / biodiversity assessment, however, further ecological assessments are being carried out, and will inform the assessment of the site. Access to open space/ green space – The site selection process, through the SHLAA and SA confirms that the sites are both within 400 metres of open space.
	Code HS34 Land East of Snell's Nook is also adjacent to Burleigh Wood and continues across to the Outwoods. It is the centre point of four key proposals for expansion of the SUE for 3,000 plus homes and the University's Science and Enterprise Park. Which has our support as a Science Park but not a Business/retail Park and the current proposal and infra-structure currently being applied for. Snells Nook Lane is a narrow lane. It is a source of genuine concern as it is now being used by HGVs and cars travelling in excess of 40 mph and used as a strategic route from the M1, A512 aimed to bypass Epinal Way and cut across to Woodhouse Eaves and designations to the west of the town. LCC Highways has	

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	recognized that it already has over-capacity. The proposed nearby incinerator, and the SUE together with more houses on the lane together with the EZ application currently before us is too much. We would request that the two proposals outlined above are removed from the Local Plan.	
EDCLP/252 Leicestershire County Council	Land Rear of Snell's Nook Lane, Loughborough (Nanpantan) (120 Dwellings): C7205 Snell's Nook Lane forms part of a key route from Nanpantan, south Loughborough and Woodhouse to the A512 and M1. The A512 between Loughborough urban centre and the M1 Junction 23 can experience congestion and delays especially during peak hours (major works/S278 has commenced); this will need to be reflected / considered in any transport assessment work.	 Traffic – The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
EDCLP 267 Loughborough Area Committee	Draft Charnwood Local Plan 2019-36 That the Planning Team consider the responses of the Loughborough Area Committee in relation to the draft Local Plan: A high degree of transparency should be communicated to residents across Charnwood, and in particular in Nanpantan, where there would be considerable development planned. Further consultation would be desirable.	The Council believes that the consultation on the draft local plan (and accompanying evidence) has been carried out in a transparent manner. The Council considers responses to the draft local plan in accordance with statutory regulations, and the Council's own Statement of Community Involvement.
Q8 - LP3 - Housin	g Sites	1
	S35 HS36 HS37 (South and South West of Loughborough) oodthorpe, east and west of A6004 Epinal Way	
DCLP/209 Mr Robert Watson	The sites proposed around Woodthorpe are not consistent with your objective to ensure that developments 'are carefully planned to avoid and then mitigate significant adverse effects on the environment including biodiversity, heritage, the separate character of settlements and landscape. HS35 should be deleted.	Site selection was informed by ecological and heritage evidence, a Review of Green Wedges and Areas of Local Separation.
DCLP/313 Dr Satbir Jassal	 HS35 at Woodthorpe is not an appropriate site for development of this size because: access would involve using Main Street Woodthorpe which would not cope with increased traffic; the amount of homes would damage the historical integrity of the hamlet of Woodthorpe which has same number of houses for last 400 years and mentioned in /doomsday book; 	Site selection has been informed by high level transport evidence and detailed transport evidence will be carried out to support final development strategy. The effect of development of site upon historical integrity of Woodthorpe will be reviewed as part of further work on the plan. Site selection was informed by evidence of Green Wedges and Areas of

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	 the amount of homes would result in Woodthorpe being absorbed into Loughborough going against vision and objectives pf preserving local hamlets and villages; development would be only one further step in merging in the merging of Loughborough with the village of Quorn countryside around Woodthorpe used for recreational purposes which will be severely affected and have a negative effect in terms of recreational environments for the local population 	Local Separation. The effect upon separation will be reviewed as part of further work on the local plan. The effect on surrounding informal recreation is noted. Policies in the new Local Plan would require appropriate level of open space and recreation provision within new development.
DCLP/342 Dr Anthony Kay	The western part of H35 (west of the lane from Woodthorpe to Mucklin Lodge) would set a precedent for urban sprawl and does not accord well with policy of urban concentration and intensification Some of the proposed housing sites do not accord well with the policy of "urban concentration and intensification". Specifically:- The western part of HS35 is another breach of an obvious boundary to development (the lane from Woodthorpe to Mucklin Lodge), and would set a precedent for further urban sprawl towards Quorn.	Urban concentration and intensification approach does not preclude green field release of land in areas currently identified as countryside. Housing allocations will be informed by landscape evidence and will take into consideration the relationship with surrounding settlements.
EDCLP/40 Jon & Brenda Cox	 Request that proposals for further development around Woodthorpe are removed from the Plan. The area is traversed by public three footpaths which are used by many people and would be appalling if the area of open space was lost. Woodthorpe predates Woodthorpe and is mentioned in Doomsday Book. Epinal Way, and surrounding housing and retail development has shrank the green wedge between Woodthorpe and Loughborough. Woodthorpe has changed radically but has retained its unique character. We hope that CBC will continue to attempt to protect the rural aspect what remains of the rural aspect of the area, I would like to emphasise Items in the Leicestershire structure plan Overall Strategy for Charnwood (ST/1). In providing for the development needs of the borough measures will be taken to: Pursue a strategy which remains generally compatible in scale and character with its location conserve, protect and enhance those features of the natural, historic and built environment which are particularly valued by the community identify areas of Green Wedge and other open land 	The request is noted. Landscape, settlement character and impacts upon heritage have been considered as part of the site selection process. Further work on these areas will be carried out as the work on development strategy continues. Any masterplanning of the site will respond to the constraints and opportunities of the site. Leicestershire Structure Plan is no longer extant Development Plan policy for the Charnwood area. The Charnwood Local Plan will contain a vision and objectives. Any masterplanning of the site will respond to the constraints and opportunities of the site, including the residential amenity of existing residents.

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	necessary to preserve the separate identity of settlements and to ensure that as urban development takes place, undeveloped links to the countryside extending outwards from the urban areas are retained	
	The impact of that new housing should be minimised by a similar degree of separation and appropriate landscaping both for the benefit of Woodthorpe, the new community and those many existing users from Loughborough and Quorn. The new housing, roads and lighting should also be sited to minimise the impact on the rural status of the area, in accordance with current policies.	
EDCLP/125 Tim Birkinshaw	Site HS35 is totally inappropriate area to build (both parts). The eastern portion of the site eats into shrinking, Area of Separation significantly altering the setting of Woodthorpe and the western portion breaks into open countryside and is detached from Loughborough.	Landscape and settlement character and impact on biodiversity have been considered as part of the site selection process. Further work on these areas will be carried out as the work on development strategy continues. Any masterplanning of the site will respond to the constraints and opportunities of the site.
	It will have a significant impact on wildlife rich lane. It should be removed from the plan. It would be better to make more use of HS36	Comments about the more use of site HS36 are noted.
EDCLP/170 Katie Masters	Concerns raised in relation to additional traffic congestion at Aldi Roundabout and Epinal Way/Ling Road as these roads are already heavily congested. Poor planning of William Davis homes which leads to on road car parking combined with the use of Allendale Road as a cut through and increased traffic leading to increased risk of accidents. The field for the proposed development is already heavily waterlogged and concerned that by building houses there will be an increased risk of of flooding of houses close to field on Alan Turing Road.	Further detailed transport modelling is to be undertaken to understand the impact upon congestion. The results of modelling will be considered in light of comments made about on street car parking on Allendale Road and road safety implications. The submission draft Local Plan will be informed by a detailed Level 2 Strategic Food Risk Assessment which will provide detailed recommendations on site allocations.
EDCLP/228 Haddon Way Residents Association	 Although an area of separation has been identified, according to the Policies Map 1 part of site HS35 sits within this area of separation. We question why an area of development is being suggested in an area that has been identified as an area to separate Loughborough and Woodthorpe from Quorn. We urge the council to reconsider this particular allocation. HS35, 36 and 37 are not near bus routes or major road and will entail travelling through warrens of developments, 	The site selection process was informed by Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Methodology and Assessment Findings Report Addendum (May 2019) Transport and access to sites will be further considered as part of the next stage in the preparation of the submission Draft of the Charnwood Local Plan. This further work will involve the Highway Authority to ensure that satisfactory access and transport arrangement to sites can be achieved.

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	 Our estate Highland Drive had originally had been designed to accommodate a bus route which isn't currently on the horizon. On street car parking and traffic calming measures give rise to concern over how a bus would negotiate these roads. It is hard to see with further piecemeal development how the transport network will adequately cope. HS35 is split into two parcels and development would have only one entrance point, from roads that are inadequate through Woodthorpe. The existing road network for these sites is already inadequate for an extra proposed 344 dwellings! 	Concerns around current infrastructure provision and the timely provision of new infrastructure are noted. Further work with infrastructure providers, including the preparation of an Infrastructure Delivery Plan will be prepared to support the Submission Draft of the Charnwood Local Plan.
	 The proposed development sites around our estate are: HS30 has been waiting to be developed for 10+ years (15 dwellings) HS31 already in the eyes of the planners fails the sustainability test, (24 dwellings) HS35 is separated into 2 parcels of land comprising of 334 dwellings HS36 is separated into 3 parcels of land comprising of 544 dwellings, 2 separated by site HS37 and the other some distance away. While HS37 is a single unit of 83 dwellings. This suggests a total of 1000 dwellings to the south of Loughborough, where these sites are all far away from bus services. The road network to reach them is comprised of residential streets. The schools surrounding these sites are already over subscribed and can't take on any more students. There are NO local medical facilities nearby. Whilst identifying these sites as suitable for housing is admirable, the current existing local residents require infrastructure and facilities. This plan makes no reference to these facilities and infrastructure, only commenting that the council will prepare a delivery plan to understand what is required and how that can be provided. Our gravest concern is that that plan will come too late for those future residents 	
EDCLP/185 LRM Planning obo William Davis	 William Davis supports the identification of land at Woodthorpe for housing development in Policy LP3, but without predjudice to this support does not consider the 	• The support for the allocation HS35 is noted as is the view that the 334 homes is not an accurate reflection of the capacity of the site.

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	 capacity of 334 dwellings is an accurate reflection of the ability of new development to be accommodated in this location There are no landscape, ecology, transport, heritage or noise reasons why a larger scale of development could not be accommodated in this location. Our previous submissions identified a development scheme that could accommodate in the order of 800 new homes. The allocation of a third of this capacity is not an efficient use of land. For these reasons, we object to the capacity given to Allocation HS35 and consider this should be increased. In its current form and extent the proposed allocation will make delivery very difficult. There remains additional opportunities to accommodate higher levels of residential development at this location, which will also improve delivery prospects in a manner which is both consistent with the principles of sustainable development and the emerging Plan's spatial strategy and could make a valuable contribution to meeting identified housing need. The identification of land at Woodthorpe for housing development in Policy LP3 accords with a spatial strategy that directs new housing development to Loughborough as the main urban settlement within the District In its current form and extent the proposed allocation will make delivery very difficult because of (1) the arrangement of development is greater than the 334 dwellings identified in this Policy the development capacity set of 334 dwellings There is no apparent logic to the two development parcels shown or the extent of green infrastructure. Of particular concern is the extent to which access has been considered and the likely requirement for a road to be constructed between the two development parcels this is an unnecessary element of infrastructure which would be more feasible within a development cell to create a compact development to maximize the site's capacity. The approach proposed is not justified by the evidence as regards the overall sui	 Further work to refine the understanding of the capacity of this site will be carried out, in light of this representation. The concerns around effect on delivery of the proposed site allocation are noted. Further work will be carried out on site capacity and masterplanning in light of this representation. The concerns around effect on delivery of the proposed site allocation are noted. Further work will be carried out on site capacity and masterplanning in light of this representation The concerns around effect on delivery of the proposed site allocation are noted. Further work will be carried out on site capacity and masterplanning in light of this representation The comment is noted. Further work to refine the understanding of the landscape capacity of this site will be carried out as well as the masterplanning in light of this representation. The comment is noted. Further work to refine the understanding of the capacity of this site will be carried out as well as the masterplanning in light of this representation The representations submitted in 2018 are noted, and will be considered as part of further work to understand the capacity of the site. The changes to the masterplan and the development capacity of 800 homes for the site are noted Quorn Neighbourhood Plan only proposes ALS between Quorn and Mountsorrel. The inspector for the Quorn NP considered the designation of ALS between Loughborough and Quorn is to be considered through Charnwood Local Plan. The comment is noted. Further work to refine the understanding of the landscape capacity of this representation. The comment is noted. Further work to refine the understanding of the landscape capacity of this site will be carried out as well as the masterplanning in light of the representation.

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RESPONSE NO/ CONSULTEE	 for development in this location and provided a mix of uses that would contribute to a balanced and sustainable community. This included circa 800 new homes, a new primary school and areas of multi-functional green space. This masterplan has been further reviewed and a further amended development framework plan is now submitted with these representations. The site has limited landscape features. Existing features will be retained and enhanced. The site is visually self contained due to combination of low-lying rolling topography and intervening vegetated boundaries. The majority of views will be available from existing housing on the edge of Loughborough. There are opportunities to enhance existing landscape features and to extend woodland and tree coverage across the area and visual impacts can be addressed through planting and development layout. Changes made to the masterplan now submitted provide for additional formal sports pitches, combined with reorientation of the proposed school site and enlarged greenways to reduce the amount of development immediately adjacent to Woodthorpe. These changes reduce the development capacity of the site to around 800 units It is instructive that the Quorn Neighbourhood Plan only delineates land to the south east of the railway line as Local Area of Separation (sic) despite the Parish Boundary extending north west of the railway line towards Woodthorpe Development of the land concerned would continue to provide open land between Loughborough and Quorn and therefore maintaining separation is not a justifiable reason to reduce the extent of development. 	OFFICER RESPONSE The comments concerning noise mitigation are noted. Such matters would be considered in detail as part of the masterplanning of the site and through the Development Management process. The proposal for a new two-form entry primary school are noted. Potential for scholl provision at this location will be considered as part of the preparation of the Infrastructure Delivery Plan. Noted The site options assessment of the SA report for site PSH255 identifies a number of significant negative effects, including land and soil, wind energy and minerals. Noted Reference to the Sustainability Appraisal Report (SA) is noted. The extract is not a word for word reproduction of the text in the SA report as the SA reports states that development sites could certainly lead to a disturbance to species that use the wooded area. Noted The loss of Best and Most Versatile Agricultural Land is identified as a significant negative effect within the SA report. The Council will consider mitigation measures for soil conservation in the next draft of the Plan. The context and qualification around the impact of site H35 upon
	• The land concerned is dominated by agricultural uses and as such existing habitats are of limited ecological value. No protected or notable plant species have been observed and all plant species encountered are common, widespread and	minerals and waste. The SA scoring of the site will be reviewed in light of representation
	characteristic of the common habitat types they represent. With appropriate mitigation measures, ecology is not considered to be a constraint to the development of the site. As such we disagree with the conclusion of the Ecological	
	Assessment Report that the developable area of this land	

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	 should be reduced (Grading C, Appendix 1 and para 4.15) Adequate separation distance from Mucklin Wood was addressed in the previous masterplan submission and can be satisfactorily achieved without the need to further reduce the developable area. Table 2 of the Ecological Assessment Report suggests that a gross: net calculation of 50% has been assumed on sites over 25 hectares. We do not disagree with this assumption per se and in the earlier masterplanning work, an area of 27hectares had been identified of the total 49hectares as development land. At a density of 35 dwellings per hectare site yielded 800 dwellings. Employing the Council's approach, the amount of development land would reduce to some 10 hectares which would suggest a gross: net calculation of 75% of the total site area. Accordingly, there is no ecological basis for such discounting of development potential. Of the options considered by The LLITM Strategic Model option 3 which involves testing 2000 dwellings at Loughborough is comparable with the 1,919 dwellings in Policy LP3 and is ranked as best overall. Paragraph 4.2.2 of the Study states "there appears to be very little to choose between Options 2 and 3". The zonal model is based on 500 dwellings at HS35 and 450 dwellings at Grange Farm / Nanpantan Grange (HS36 and HS37). In the Draft Local Plan, a different approach is proposed; HS35 is allocated for 334 dwellings whereas HS36 and H37 total 627. Together, these would provide 961 dwellings comparable to the zonal model. Significantly, also within the model are 700 dwellings located south of Nanpantan Road west of the urban area which is not then carried forward to the Draft Local Plan. On this basis there is evidently scope for additional development around the southern periphery of Loughborough within the assessment envelope provided by Option 3. This would allow a in transport terms a greater scale of development at HS35. HS35 is best placed for additional development around th	

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	 on either the congested town centre network (as is the case for South / South West Loughborough as noted in paragraph 4.2.16 of the Study) or creating an additional burden on existing residential areas (as is the case for HS36 and HS37). Heritage: Development in this location would not impact on any Scheduled Monuments Registered Parks and Gardens or Historic Battlefields. There are a number of listed buildings and the Loughborough Conservation Area in proximity to this location, however, in almost all cases the absence of inter-visibility between these designated heritage assets and the site means that there would not be an adverse impact. In the case of Reynalls – a Grade II listed building situated on Main Street – the core of its significance is provided by its form and fabric; neither of which will be affected by development. Any impact on its wider setting will be slight. Development would be an appropriate location in terms of noise subject to installation of acoustically enhanced glazing along the east and north boundary of the site. To avoid this mitigation measure it is proposed that residential properties should be built approximately 40m from the edge of the nearest road and 25m from the heritage railway. Even allowing for this stand-off, this site's capacity is as set out in the earlier submission The development scheme set out in earlier submissions identified land for a new two-form entry primary school. We have discussed this with the Local Education Authority who have indicated their support for such provision in the location. This would represent a material benefit of the proposed development. The above is reflected in the Council's Strategic Housing Land Availability Assessment which records the site as suitable with no irresolvable physical or environmental constraints, a suitable access can be achieved and available The Sustainability Appraisal this location is referenced S115/PH255 measuring 48 hectares. This size of site corresponds wi	

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	the SA concludes that the effects would be neutral or positive and there are no significant constraints or major adverse effects.	
	In the following paragraphs we have commented on certain of the findings in Table 6.10 in relation to Site 35 (S115/PSH255).	
	 findings in Table 6.10 in relation to Site 35 (S115/PSH255). Page 71 of SA report explains that of the two sites identified as extensions to Loughborough, Site S35 is in a less sensitive location, and provided the site is well designed (in accordance with Plan policies), negative effects on Charnwood Forest are unlikely to be significant. Biodiversity The SA records that HS35 will not lead to fragmentation of any habitat but could lead to a disturbance to species that use Mucklin Wood (noise, light, domestic animals, recreational pressure, and loss of supporting habitats) and that this has the potential for negative effects. It goes on to rightly acknowledge that suitable areas of green space between the developed area and this important habitat would minimise this risk. Policy LP22 (Conserving and Enhancing Biodiversity and Geodiversity seeks to avoid effects of biodiversity are avoided an dnet gain is secured. The Plan sets out the need for development to be informed by a masterplan and green infrastructure strategy. On this basis these measures will help to ensure that negative effects are minimised. Development at Woodthorpe would result in the loss of Best and Most Versatile Agricultural and this would be a negative effect. However, this must be considered against the preeminent role of Loughborough in the spatial strategy, it being the most sustainable location at which to locate new development, and the extent of other physical and environmental constraints (eg flood risk) that restrict options 	
	for growth. As the SA acknowledges this loss is unavoidable. Mitigation measures in terms of soils conservation and policies to this effect could be included within the Local Plan.	
	• The Sustainability Appraisal identifies the Site S35 within an area considered to be unconstrained for wind energy (Figure 4.6a). (as evidenced through The Renewable and Low Carbon Study for Charnwood Borough (2018). On this	

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	 basis, the SA suggest new residential development would be subject to a potential / minor constraint. It is important to see this finding in the context of the wider conclusions of the study which identifies significant areas across the District that meet the same criteria in terms of suitability for wind development, especially in the more rural areas. This results in an important qualification to the extent of constraint suggested by the SA. With regard to Historic Environment we agree with the commentary in the SA in respect of "The Reynalls building that neutral effects are predicted". With regard to minerals the Leicestershire Waste and Minerals Local Plan identifies an extensive area within Charnwood that is safeguarded for Sand and Gravels. The area extends the north and east of Loughborough, encompasses Quorn, and covers large tracts of land to the north of Leicester, only a very small area of Site 35 is part of this designation – less than 10ha of the 45ha identified. When viewed in this context, the potential constraint is minimal and Policy M11 of the Waste and Minerals Local Plan does not prohibit the allocation of the land concerned where there is an overriding need. 	
EDCLP/172 John Masters	My house on Alan Turing Road is already at increased risk of surface water flooding and not all home insurers will provide me with insurance due to this risk. The field opposite Alan Turing Road collects a lot of water so houses built here will further increase the risk of house flooding both with new homes and current houses on Grange Park Estate.	The submission draft Local Plan will be informed by a detailed Level 2 Strategic Food Risk Assessment which will provide detailed recommendations on site allocations. Concerns around school provision are noted. The Submission Local Plan will be supported by an Infrastructure Delivery Plan which will be drawn up with infrastructure providers, including the Local Education Authority
	 There is not adequate school provision with both primary and local secondary schools now heavily subscribed. The traffic near the new Aldi is heavily congested and new houses around Grange Park will add further to the traffic congestion. 	 Further detailed transport modelling is to be undertaken to understand the impact upon congestion. The results of modelling will be considered in light of comments made about on street car parking on Allendale Road and road safety implications.
DCLP-264 LCC - Education	 Loughborough Primary Schools There are 14 primary schools in Loughborough of which only 3 have some potential to expand but not by the 579 places required by these developments. Therefore a new school would be required preferably in the South of 	The capacity of primary and secondary schools in Loughborough is noted. This information will inform the preparation of the Infrastructure Delivery Plan.

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EDCLP/252 Leicestershire County Council	 Loughborough. Loughborough Secondary Schools Capacity and scope to expand schools in the Loughborough area. Eastern parcel abuts A6004 Terry Yardley Way (50mph) and Main Street, Woodthorpe. A6004 is part of the County's proposed Major Road Network around Loughborough and leads to the A6 towards Leicester; this will need to be reflected / considered in any transport assessment work. A6004 is an A-class road with a speed limit over 40mph thus any proposed new access on the A6004 may be restricted by policy IN5 of the LHDG. Western parcel does not abut public highway and is segregated from the nearest adopted highway by designated open space / outdoor sport pitches; this will need to be reflected / considered in any transport assessment work. 	Comments concerning highway access will be considered as part of ongoing preparation of transport evidence and as part of work to understand the potential capacity of the site.
HS36 & HS37 - Na	npantan Grange, Land south west of Loughborough, Extend Park	c Grange Farm
DCLP/342 Dr Anthony Kay	 Some of the proposed housing sites do not accord well with the policy of "urban concentration and intensification". The northern part of HS36 seems reasonable, although how would it be accessed? Priory Road and Bradgate Road don't seem to be suitable. The southern part of HS36, together with HS37, would however be a significant intrusion into open countryside towards Charnwood Forest, and would be difficult to serve by public transport. 	Sites adjacent to or within urban areas of Loughborough are considered to accord with the strategy of urban concentration and intensification. Public transport and highway access to sites will be further considered in the preparation of detailed transport modelling to support the submission draft of the Local Plan. Site selection has been informed by landscape sensitivity assessment. Impacts upon the landscape will also be considered at the masterplanning stage for sites identified in the preferred strategy.
DCLP/422 Mrs Terri Cooper	 Concerned over amount of housing proposed on HS36, accept the cemetery but housing will change the view of the land and connection with natural beauty around it. Land used recreationally and borders the Outwoods and will become a building site for years. Previous strategies saw it important to maintain area's integrity, should be protecting green spaces not destroying them. Unfinished developments in Loughborough and big developments already in place. How do the existing developments account towards overall housing targets? 	Site selection has been informed by a landscape sensitivity assessment and ecology evidence. Impacts upon the landscape, green spaces and ecology will also be considered at the masterplanning stage for sites identified in the preferred strategy. The draft strategy in the current plan is considered the most appropriate strategy given the sites available to meet our housing need. Chapter 4: Development Strategy details how existing developments contribute to the overall housing target. Table 1, page 18 shows the housing need and supply with Table 4, page 25 showing how existing planning permissions and allocations are distributed across the Borough.
LDCLP/15	HS37 should not be built on as its sensitive location	Site selection has been informed by a landscape sensitivity assessment
Anonymous	 HS36 is also sensitive landscape and in a black flood zone 	and flood risk evidence. Impacts upon the landscape will also be

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	 trouble for future residents obtaining home insurance 	considered at the masterplanning stage for sites identified in the preferred strategy.
EDCLP/80 Historic England	 HS37 will fully encircle the Grade II Park Grange HS36 has potential cumulative impact together with HS37 Beacon Hill Hillfort is 1.2 km to south west and there is a non-designated moat to north east. Grade II* Stables and Hall (Beaumont Hall) to south. A buffer zone and the scale of any proposed buildings should be considered. 	The impact upon heritage assets are an important aspect of sustainable developments and will be reviewed in light of representations. They will also be considered at the masterplanning stage
EDCLP/179 Mark Rose Define obo Bloor Homes (HS37)	 Welcome preparation of the Local Plan and support positively planning for sustainable development. Site immediately available for residential development but should be extended to include all of the available site. Suitable location for development, well integrated with the existing urban area; benefits from good access to local and higher order services and employment areas in Loughborough via sustainable transport modes with a high number of key services and facilities in a 2km radius of site, including primary and secondary schools, medical centre, sports ground and local retail facilities. Scope for enhancing the public transport network in the area has been investigated, and there is potential to extend local bus routes to bring services closer to the site and also improve accessibility to services for existing community. Comprehensive site assessments demonstrate that there are no technical or environmental constraints to development that cannot be appropriately mitigated, and have informed the preparation of a Vision Document that has already been submitted. Vision Document demonstrates a high-quality housing development that respects its relationship with the surrounding urban form and countryside, and uses the site in an effective and efficient manner. Development would result in significant benefits to Loughborough, the Borough and the wider Housing Market Area in the economic, social and environmental dimensions of sustainable development as set out below: Delivery of a significant contribution to addressing the identified housing ned in the Borough and unmet need in wider HMA, in a location that would contribute to a sustainable pattern of development. Provision of a range of house types, sizes and 	 The support for the allocation HS37 and the additional supporting information is welcomed. The view that the site should be extended is noted. An initial assessment of site-specific factors was undertaken to inform the allocation and further work to examine the extent of the site will be carried out in light of the representation. The benefits of the development in terms of access to facilities; public transport; housing provision; sustainable development; green infrastructure; public open space; sustainable modes of travel and the environment are noted. A comprehensive masterplan which takes account of neighbouring allocations is supported and would ensure that the best possible proposal is delivered. The draft policies map was produced using an initial assessment of the submitted site. It is intended to show that landscape and green infrastructure will form an important element of the site and is not definitive. The Policies Map will not provide site-specific detail to allocations and the inclusion of key development principles in policy wording will be considered.

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	 tenures would widen housing choice in the area and create a mixed and cohesive community representative of the local population. Provision of a substantial proportion of affordable housing allowing those on lower incomes or concealed families to remain in or return to the area. Provision of pedestrian and cycle links through the site would integrate the development with the existing community, encourage active travel, and provide links to community facilities and enhanced bus services. Connections to existing footpaths to surrounding Green Infrastructure and wider countryside would also be provide a wider community benefit. Substantial areas of public open space, including parkland to the west, would provide informal recreation opportunities and an accessible place for people to meet, relax and play, aiding the health and well-being of residents and the wider community, encouraging social interaction and creating a sense of identity and ownership within the development. Significant structural landscaping within, and around the edges of the site would reflect and enhance the local landscape character contributing to the Charnwood Forest Regional Park aspirations (Policy LP 20) and integrate the housing into the surrounding landscape. Retention of landscape features and creation and management of new planting and SUDs within the site would provide new habitats and enhance existing habitats, improving the biodiversity in the site. Site is available, suitable and deliverable to make a significant economic, social and environmental benefits in this urban fringe location. Therefore, site should be allocated in its entirety for development in the Plan. 	

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	development potential of the area through an iterative site assessment and masterplanning exercise to extend the Masterplan proposals but retain key development principles set out in the submitted Vision Document. To take account of key considerations set out in Policy LP3, but also the necessary site access and drainage strategies. Bloor Homes look forward to discussing the outcome of that and the further refinement of the site allocation with the Borough Council.	
	Policies Map	
EDCLP/228	 Inappropriate to delineate the built form and Green Infrastructure within strategic allocation sites on the Policies Map. That requires a comprehensive site-specific evidence base taking account of key matters highlighted at an appropriate scale. Deliverability of the site could be undermined or opportunities for socio-economic betterment and/or environmental enhancements overlooked. It would be unduly prescriptive and remove the flexibility to allow development proposals to evolve and respond to changing circumstances and matters identified through the design process progress. Allocation policies should rely on establishing key development principles in policy wording. Draft Policy LP33 expects new developments to be near 	Draft Policy LP33 requires access to key facilities and services to be
Haddon Way Residents Association	 existing transport links, however, HS35, 36 & 37 aren't near bus routes or major roads to take traffic to other parts of the road network, to get to major roads means travelling through warrens of developments. Infrastructure Delivery Plan is dated and should be produced in combination with the Local Plan. 	provided by walking, cycling and public transport. The sites are considered to have the ability to achieve this policy requirement. Public transport and highway access to sites will be further considered in the preparation of detailed transport modelling to support the submission draft of the Local Plan.
	 Infrastructure delivery plan is to be prepared to understand what is required to support development, but infrastructure is required to support development not simply understanding this. Infrastructure needs providing where needed and before 	Infrastructure provision is a vital feature in providing sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. The infrastructure delivery plan will be updated to identify when, where and how the requirements will be met.
	 housing developed with penalties for not providing 1000 dwellings proposed to south Loughborough, away from bus services, poor road network, schools oversubscribed, no medical facilities 	Viability is another important consideration for delivering the Local Plan, this means it is not always possible to provide infrastructure before the housing that will pay for this.
	Current residents require infrastructure and facilities, the plan makes no mention of this. 582	Concerns around current infrastructure provision and the timely provision of new infrastructure are noted and will be further assessed. Planning

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		legislation means that new development cannot be required to correct existing deficiencies in infrastructure and facilities.
EDCLP/220 P.Patel	 Oppose allocations HS33, HS34 and HS36 off Nanpantan Road which is already experiencing increased traffic especially at peak times introducing further risk and impact to the community enjoying a walk to work/schools, due to the volume of traffic/pollution and noise from increased vehicles. This increase can influence highway safety and introduce parking issues in the neighbourhood. Increase load on local schools already under stress. Traffic during school dropoff/pickup times already causes distress to the community; schools are being contacted by residents. Risk of increased drainage and flooding issues from development. Area surrounded by woodlands, wildlife and is a natural place for locals to explore and visit. Development will detract from the glorious natural environment around the Nanpantan Road leading to the woodlands and will impact our natural wildlife. 	Site selection has been informed by a variety of evidence including transport assessments, landscape sensitivity, flood risk and ecology evidence. Impact will be further considered at the masterplanning stage for sites identified in the preferred strategy. Infrastructure provision is a vital feature in providing sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
EDCLP/192 Severn Trent Water	 Require further information on certainty of development and the timescales to enable capacity improvements requirements to be reviewed and implemented. 	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses
DCLP- 425-470 Environment Agency	 HS36 is within catchment of Moat Brook, a tributary of Wood Brook. Future Wood Brook flood risk management scheme may be considering upstream options for flood risk measures in or around this site. Site includes the flood zone 2 extent and must consider flood risk. A flood risk assessment must be completed for all development within flood zone 2 and also due to scale of development site. Assessment should consider flooding from all sources and the proposed use vulnerability for the entire lifetime of the development. 	The information on the flood risk management scheme is appreciated and the East Midlands team will be contacted for further details. Site selection was informed by evidence, including flooding, and are those sites that best meet the Council's objectives. This will be reviewed in light of representations received.
DCLP-264 LCC - Education	 14 primary schools in Loughborough of which only 3 have some potential to expand but not by the 579 places required by these developments. Therefore, a new school would be required preferably in the South of Loughborough. Capacity and scope to expand secondary schools in the Loughborough area. 	The capacity of primary and secondary schools in Loughborough is noted and is an important aspect of ensuring development is sustainable. This information will inform the preparation of the Infrastructure Delivery Plan.
EDCLP/252 Leicestershire	 HS36 does not abut the public highway; the nearest adopted highway is a cul-de-sac which serves a hospice. 	Highway access is an important aspect of site allocation and will be examined.

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County Council	Given the number of dwellings proposed consideration should be given to the suitability of the route to the site to carry additional traffic; this will need to be reflected / considered in any transport assessment work.	
EDCLP/252 Leicestershire County Council	 Burial Ground south west Loughborough (yellow) does not abut the public highway – only BOTAT K59 (off Nanpantan Road – C3210) and PROW footpath K58 (off Cricket Lane). 	The site is currently subject to a planning application with access part of the proposal.
Q8 - LP3 - Housin Specific Sites – H	g Sites IS65 HS66 (Cossington)	
HS65 & HS66		
DCLP/7 Charlotte Bandyopadhyay	 Concerns about: Flooding near Main Street; and Traffic on Syston Road and Main Street – accidents on the T- junction on Syston and Main Street. 	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation
		measures required to manage the impact of growth.
DCLP/13 Lynda Simmons	 Firstly on the flooding problem. Cossington is flooding and every time the flooding get worse at both ends of the village. The land on the corner of Cossington - Syston Road and Main street floods badly and is a traffic hazard. The drains are not able to cope with it. Also, there is no viable access from Syston Road or Main Street 	 Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be
	for the development plan, these are very busy roads and the T Junction is known for accidents.	undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
DCLP/126 and DCLP/127 Mr Stuart Love	• There is no mention of the serious flooding in Cossington in the past and indeed as recently as October 2019 when Main St was very badly flooded as was the land next to Derry's which is proposed for homes (HS66).	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	 Additionally, the road from Rothley to Syston is flooded most times when there is heavy rain and is often impassable as is the cycle path along the Grand Union Canal. Access from / to site HS66 (To rear of Derry's, Cossington): A main concern is that if access to this proposed site is offer. 	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	major concern is that if access to this proposed site is off Humble Lane it will have serious negative impact on Bennetts Lane and Back Lane.	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical

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	• These are both one lane roads not wide enough for 2 cars and with no paths for pedestrians. Both of these lanes are already used as "rat-runs". Any additional traffic from the proposed homes would further increase the traffic on these 2 lanes creating a potentially dangerous situation for both the residents of these roads and the traffic using them.	requirements and be approved by the Highway Authority.
DCLP/140 Mr Andrew Unitt	 Two sites are identified in Cossington. Both of them have potential access issues. HS65 is a corner site and care needs to be taken with site access to avoid increased risk of accidents on Syston Road and Main Street. Also, is this land not on the flood plain? HS66 is to the east of the village. Humble Lane is a narrow road with two sharp bends and no footpath between the proposed site and Main Street. As an access route this is inadequate and potentially dangerous. Bennett's Lane is too narrow for two cars to pass, so is also inadequate. Surprised that access isn't from Main Street, although I accept that this would require consent and purchase of some land from Derrys nurseries - I have no idea if they would be open to discussing any options. Surprised the document doesn't propose building on the land on the corner of Syston Road and Main Street, opposite HS65, if there is a need to nearly double the size of the village. Access would be much easier. 	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. The proposed allocations stem from the sites put forward through the Call for Sites and SHELAA process; along with sites received through the formal consultation process on the local plan.
DCLP/261 Mrs Beth Somi	 You mention 3 points in particular that I would like to challenge: Managing Flood Risk: The draft policies seek to direct development to those areas where flood risk is lowest, reduce the impact where this is not possible and deliver sustainable drainage systems to manage water flows. Road Transport: The draft policies seeks to ensure that the impacts of development on the highway network are mitigated appropriately and appropriate car parking is provided. Sustainable Travel: The draft policies seek good walking, cycling and public transport links and charging points for electric vehicles to be provided on new developments. So far this year we have been unable travel to and from work using the easiest route on at least 8 days due to flooding. The flooding is on Syston Road where you are proposing to build 54 houses. How will they be able to leave / enter their homes if the roads are flooded? Currently when the road is flooded, all other routes are impacted by the extra traffic resulting in long delays. Even the 70 extra houses will make these delays worse. 	 Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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	 Both Bennetts Lane and Back Lane have no pavements. In parts they are both only accessible by one car, forcing a vehicle coming the opposite direction to pull over so they can pass. How will we as residents be able to walk around our village if there are extra cars forcing their both ways on these roads? I imagine more long delays due to the number of cars trying to enter and leave the village. Humble Lane is also a road with dangerous bends and tights corners that are not ideal for cars from an extra 70 houses. Platts Lane is also not the easiest road to navigate, especially in the dark. There is only one bus that runs through Cossington. Currently the service is poor due to breakdowns. The bus doesn't run at all in the village when there is flooding. I do not understand how this can be described as good public transport links. As a general point, there are no facilities in Cossington and as such any extra housing will put extra pressure on resources in Sileby in particular and there are already current and future plans for extra housing here, with no plans for extra facilities. It seems quality of living isn't a consideration with these plans. Roads need to be improved, flooding prevents and bus services increased to be able to cope with the extra housing proposed. 	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
DCLP/316 Miss Fiona Gibbs	 HS65 and HS66 proposed developments in Cossington have several common problems: Adding to an already overloaded road, sewage and school infrastructure. The combined proposed development would almost double the current size of the village, alter the existing appearance and nature of a small village for ever. HS65 is outside the current village and would form a stand alone development due to the nature of the road infrastructure. Single developments have been turned down in the past for 'altering the appearance and approach to the village and for being in the countryside'. One can only think that if this was to go ahead there would be no need to worry about it being in the countryside because there would not be much left. HS66 the road infrastructure is down single track lanes with no pavements wholly inappropriate for extra traffic. On a wider point the whole planning process seems driven by building ever increasing amounts of houses. The Eastern Soar valley villages have had tremendous amounts of housing in the last 15 years and more is being built now. At no time has there been improvements in the particularly the road and sewage 	 The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority. The possibility of a new settlement was considered within the SA as part of four different 'high-level' housing growth scenarios / distribution options; and two 'refined' options.

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	 infrastructure. At regular times several of the local roads become impassable due to flooding throwing traffic onto the already overcrowded roads some passing through Cossington causing traffic jams at junctions. Syston Road is used by an already large volume of traffic. Where has been the joined up thinking to provide the necessary infrastructure these extra developments need. Where are the A6 / A46 link roads where are the school places, doctors surgeries. Extra sewage treatment, currently the already overburdened system is regularly pumping raw sewage into local watercourses. The already overburdened villages don't need more houses they need more sustainable development so that people don't have to commute. A more sustainable plan would be for a discrete development somewhere on the A46 corridor where a self contained large development would be a better way of providing the number of houses proposed with small infill developments in the already overloaded villages. 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
DCLP/317 Mr P Edgley	 Concerns raised over: Note the latest flood risk assessments now show significant areas of Cossington to be in flood zone 3. This includes any potential road access to site ref. HS66 that could be made from Cossington Road next to Derry's nursery (should the Humble Lane access be rejected). Access to the proposed housing on this site could therefore be cut off during flood events even if the properties themselves do not flood. Flooding problems on both Cossington Road and Syston Road urgently need addressing before development on either of these two sites should be permitted. It is generally accepted that climate change will make flooding events more regular in the future. It is unlikely that developer contributions from smaller sites alone would pay for this work to be completed. I also understand from anecdotal evidence that there may have been a failure to take up funding from central government to tackle flooding in the Soar Valley previously. If this is correct then I would question whether sufficient funding streams will be available for to pay for this work to take place in the future. 	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. The access point for HS66 is still to be determined. Essential infrastructure (such as a road) can be delivered in Flood Risk Zone 3, subject to the Exception Test, and it being designed and constructed to remain operational and safe in times of flood.
LDCLP/04 Mrs Pam Hanson	 RE Cossington [HS66] I have received a letter regarding the matters of 70 houses being built in the field behind my house. I couldn't believe my 	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.

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	 eyes when it said no flooding issue at Cossington. Also regarding the access from Humble Lane. It's a few years ago since a plan to build a sports field on the same site was dismissed because the access from Humble Lane wouldn't be safe! Now you need access to 70 homes from there!! Also Back Lane isn't wide enough for 2 cars to pass in places especially when a tractor comes along! Bennetts Lane is not quite suitable for extra traffic as it's dangerous at the top. 	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
LDCLP/07 Barry & Zoe Whitehead	 I am responding to your Cossington status report: Cossington does not have a flooding issue. This conclusion must have been made before the recent very concerning flooding, which has caused such chaos, with some Main Street residents being left in serious life-changing situations, and some having to vacate their properties. We also have the increase in the number of occasions it has been necessary to close the Syston/Rothley main road. To contemplate building 70 + 45 new houses would do nothing to enhance the village, but rather worsen the situation with the arrival of even more people and cars. Access is going to be from Humble Lane so need to consider the increase to the traffic Back Lane and Bennetts Lane If access to one of the developments is via Humble Lane then this will most certainly result in increased traffic on Bennetts Lane and Back Lane. Both these lanes are extremely narrow, with some parts only passable by a single line of traffic. Access for emergency services, refuse & garden collections is not easy now. I daren 't contemplate the days-months-years of noise, delays and upheaval emanating from the developers arrival. Even now there are very large vehicles passing along Main Street. Cossington and Crab Tree Lane Living in a bungalow on Fisher Close we have a brick wall boundary on to Crab Tree Lane, naturally we are concerned 	 Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority. Impacts of development on landscape, green space, and biodiversity have been considered as part of the site assessments. Any future proposals will be assessed, and any impacts would be mitigated appropriately. The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	about several aspect of the proposed building behind us: Expert opinions about Global Warming can no longer be disregarded. We would hope that all the trees, running along Crab Tree Lane would be respected and retained.	

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LDCLP/09 Robert Jessop	 This existing tree boundary would still offer us an element of continued privacy - providing the new houses were not tall or of the three storey variety. The new residents will be concerned at the noise the various train services cause. This is no problem for the villagers but of course the new arrivals will be very much closer to the track, Cossington does not have a Doctor's Surgery. There are services available in Sileby & Syston but the proposed growth of the populations in Cossington & Sileby would put a severe strain on these surgeries. I have concern about your consultation plan which is considering the building of 70 houses in Cossington. [HS66] My main worry is the flooding, recent events have proved it is a real danger in the village. The floods in October which required the Fire Service with rafts to be in attendance were caused partly by water from the fields. If these fields are built on with all that entails I cannot imagine what will happen in the future. Syston Health Centre which would be used by many of the residents is already under huge pressure with all the extra housing in Syston. It used to be fairly easy to get an appointment, not anymore and the queues at the surgery show why. Back Lane and Bennetts Lane are totally unsuitable for access to the area as they are both narrow lanes without pavements. It would create a very hazardous area for pedestrians, cyclists and cars. 	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority. The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
LDCLP/10 Norma & Haydon Johnson	 We are writing to express our opposition to the two proposed housing estates in Cossington, our reasons being:-SITE 1, 70 HOUSES, HUMBLE LANE This field soaks up a lot of rainwater but still remains very wet, especially on Humble Lane side. If the field is filled with the concrete of 70 houses, where will the displaced water go? We already have severe flooding issues as seen these past six weeks, Cossington Brook and our village drains cannot cope with more water. Weather forecasts predict more of this type of weather in future. Also, the neighbouring village of Sileby has had a lot of new housing and more have been approved. The Peashill Farm site 	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.

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	 will surely displace more water across to Cossington and increase our flood risk. The roads around our village are well used and extra traffic will cause problems. Bennetts Lane and Back Lane are too narrow in places for two vehicles to safely pass and if you meet a tractor – Good Luck! 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	 Humble Lane is popular with cyclists and walkers but most of the lane does not have a footpath, so again safety is a major concern. Changing shopping habits mean that more delivery vehicles 	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
	 would be using these roads. A housing estate on Site 1 would also give rise to noise and light pollution for existing residents and cause loss of habitat and food source to wildlife. We have bats, owls, woodpeckers, fox, buzzards and numerous hedgerow birds. 	
	 SITE 2, 45 HOUSES, SYSTON ROAD Road safety is a big issue. Syston Road is very busy and fast. The speed derestriction plus the bend means traffic is upon you very quickly when trying to exit the village from Main Street. Excess rainwater pours from the fields along Syston Road and 	
	 Excess failwater pours from the fields along System Road and has caused flooding at the junction of Main Street and System Road on numerous occasions. These two proposed sites would increase the size of Cossington by at least a third and would be detrimental to the identity and community of the village. 	
LDCLP/11 C P Simmons	I feel it necessary to OPPOSE FUTURE DEVELOPMENT for this area. The major reasons are listed below for your attention when you review the situation.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	 A. OBJECTIONS COMMON TO BOTH SITES 1 AND 2 1. The road system already in situ around the village and Main Street is already a 'ratrun'. Over the last 20 years the heavy and light traffic has considerably increased especially at peak 	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	period ie. 7.30-9.30 and 4.30-6.00. The existing roads are narrow. Have bends and corners etc and will not stand an increase in traffic which this plan suggests.With reference to the plans both areas suggested are outside the Cossington building line and are in land considered to be	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	countryside. Does this now not apply and you are moving the goal posts. I know this for fact because during the last 4 years I	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport

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	 had an planning application for a infill property on my land turned down because of this rule. With regard to the environment, Cossington is currently classed as a conservation village. Consequently, for this plan to go ahead will trees and hedgerows etc be removed and destroyed. I am sure this is against conservation principles. Flooding re the village, Main Street, Syston Road, Cossington Mill area etc. this has increase during the last 2/3 years when we have moderate to heavy rainfall and according to the experts (global warning) this is likely to get worse. When I first lived in the village 12 years ago my house had over 12" of water over the ground floors. During the last 3 months I have heard of other problems in the village experiencing this problem, further building in both areas will only escalate this problem. Re central services to the village. I disagree that one school and local doctors can cope with an proposed increase in population e.g. if I reserve an appointment with 'my' doctor at Syston Health Centre it takes 7/12 days to get a visit. This would get worse especially as there is a shortage of doctors in our area and across the country as a whole. The NHS cannot cope!! As there are limited shops in Cossington and the outskirts of Rothley, Syston and Sileby. An likely increase in population suggested by these proposals will not benefit the area. It will only increase the movement of people and traffic and in this world it is accepted that roads are non too congested and then there is the added pollution of air to the area. 	 demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority. Impacts of development on landscape, green space, and biodiversity
	 B. OBJECTION TO SITE 1 1. Back Lane, Cossington and up the Humbles are both narrow lanes with no lighting and footpaths. We already have too much traffic on the above roads especially when you take the blind bends/corners and people walking in the road into consideration. 2. Bennetts Lane cannot carry the amount of traffic safely today and especially when it is used for diversion purposes when required, again the road is not wide enough to be used as a permanent link road for the village. Also no footpaths in existence for current people or proposal increase of people. The road is just not suitable. 3. Access to this area either by the top of Bennetts Lane or Pack 	

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	Lane/The Humbles would be almost impossible without major changes to the existing road networks.	
	 C. OBJECTIONS TO SITE 2 1. Road surface water on blocked road due to flooding as Cossington Mill towards Platts Lane turning for the village and all prompt the Syston Road from the 'T' junction with Cossington at Syston Road is now becoming a big problem for the areas. Especially during the autumn/winter months the proposed development will not help the situation in these areas ie. Increase in 'concrete footprint' affects drainage and restricts water flow. 2. Again a shortage of footpaths and lighting along the Syston to Rothley Road also for a link road it is narrow and has blind corners not suitable for heavy traffic and vehicles we have today. Let alone an increase if this plan is implemented. 3. The 50 mph speed limit is far too much for the road from the main street T junction Syston Road to Cossington Mill. Also please bear in mind blind corners on this stretch of road. 	
	 D. SUMMARY [Redacted] I have lived on this property for over 20 years. Consequently I know the area well. During this time I have seen the area concerned suffer with regard to the environment, road, flooding and amount of traffic etc. Any increase in population will cause more problems for the area. I feel that I must object to these proposals for the reason previously listed. The only benefits I can see with this project is that it is an advantage to the current landowners. But it is of no benefit to Cossington village, its people and the area of the Rothley, Syston, Sileby triangle. One fact I would like to be clear of is when the decision is made re these proposals if permission is granted where do we stand with an appeal! Also what is the situation regarding the current Cossington building 	
	Ine and its surrounding countryside. Please remember that this triangle of land is located in the flood plain of the River Soar and its canal. It is also a conservation area and if this plan somehow goes ahead the area is in jeopardy. It would also be of interest to be informed what is planning for Swithland, Woodhouse Eaves and Cropston because all of these	

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	villages with Cossington make this an attractive areas. During the last 5/10 years you have destroyed areas within Rothley, Mountsorrel and Quorn with housing developments.	
	SOME PROTECTION FOR THE FUTURE IS NECESSARY TO PRESERVE THE COUNTRYSIDE, ITS VILLAGES, PEOPLE AND WAY OF LIFE!	
	One final question. If schemes take place, what % of the 110 houses will be low cost affordable properties. We are told we are short of these.	
LDCLP/18 Mrs P Adams	I have received your information from Cossington Parish Council re housing plans for Cossington, and would like to make the following comments:- Item 2. There are no Doctors, shops or a post office in the village.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	Item 3. How can you bring wealth and spending power into a village which has no outlet for spending? Item 4. Cossington does flood, houses have already been flooded out this year.	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	Item 5. MOST OF ALL I have to use Bennetts Lane most days it is already a night mare, it is not wide enough for 2 cars to pass without one pulling over. Cars are often parked when visiting and especially on the right hand side going down there is no where for	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	them to go. As of late cars and vans have had to park right on the junction and this is very dangerous as you cannot see cars approaching from Sileby, also cars are often parked right up to the junction in the main street. Back Lane is to be avoided at all cost, no 2 cars can pass and if heavy lorries are there you have to back up. One day even now	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	there will be a serious accident at the junction (cross roads) due to cars parked right up to the junction and cars coming out are unable to see cars approaching from Sileby.	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
LDCLP/25 Mrs M Hubbard	I OBJECT TO THIS APPLICATION FOR THE FOLLOWING REASONS. In the letter sent to the local residents dated 11.11.19, it has been stated that Cossington does not have an issue with floods.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	Although, on the 1st October 2019, Main Street of Cossington flooded and it was absolute chaos. You could not drive or walk through main street, many residents had their homes flooded and have been forced to move out of the village whilst their homes are	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	being repaired, which may take over a year. Syston Road, from Cossington to Rothley continuously gets flooded	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be

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	 when it rains, resulting in that route being closed off and residents are unable to get into the village by that route. Two other routes that repeatedly get flooded are Slash Lane in Sileby and on and around the Gate Hangs Well pub in Syston. These floods result in the only reliable route to get to and from Cossington village is through Barrow and/or on the A46. Causing bumper to bumper traffic which affects the daily life of local residents. THUS, building more houses within this village will cause more chaos during bad weather conditions. I.E- MORE TRAFFIC AND MORE DELAYS which will NOT help with air pollution. A 15-minute journey can take up to an HOUR. The roads around the area will become gridlock with traffic The letter dated from 11th November 2019 also states that there is plenty of room in Cossington Primary Schools website states that the roll is 104 children, plus stating that the admission for children is 15 children per year. The schools' catchment area stretches out to the edge of Sileby. How will such a small school cope? 	undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
LDCLP/32 Michael Weston- Web	I lived in Cossington for the first 26 years of my life. I then got married and moved to [redacted] Sileby. Cossington was a safe place to grow up in with my friends who I still meet. We are horrified at the thought of the village doubling in size. Cossington Road and Main Street Cossington are horrendous in the morning for traffic. There are far too many large lorries using these roads. I realise that it is a way for Sileby and Barrow people to get to Leicester, A6, A46, Ml. With the estate there will be at least 200 extra vehicles plus service vans etc. When Cossington was flooded recently Sileby was also flooded and I had difficulty reaching my home which was not flooded. It was difficult for people from both villages to get out - Centre of Sileby, Slash Lane, Mountsorrel Lane, Brook Street, Cossington Road and from Cossington Syston Road, Main Street Homestead Close, Hall Close. As Cossington is a small village why are you proposing the same number of houses as the larger villages are getting. It will drop the value of houses so who will compensate the residents? Why do you not build on the many brown field sites which sit idle and would be near to services e.g. bus routes, walking into towns	 The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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LDCLP/50 Anonymous	 etc. I have been advised by our Parish Council of your above mention Local Plan for Cossington. I do not feel that the proposed developments should go ahead in Cossington for the following reasons: The roads in this small village would not be able to cope with the increased level of traffic, especially at school times. I am concerned that the amount of proposed houses will significantly alter the water table in the village and cause flooding. There are no shops in the village or a doctors surgery. 	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport models of an analysis of
LDCLP/54 Penny Weston- Webb	COSSINGTON - CHARNWOOD LOCAL PLAN 2019-2036 I have lived in Cossington all my life [redacted] and am passionate about our beautiful village. As you are no doubt aware it was mentioned in the Domesday Book so is full of history. I am 110% against any more building within the village boundary. We are a conservation village with a large number of listed buildings. We have under 200 houses in the Parish and you are proposing over half again. The land belongs to a farmer who lives outside the village and the other parcel by someone who has recently moved into Cossington so neither care about our precious village. We have one resident who has lived here for a long time who wants to build in his garden a retirement home but you will not give them permission to do so although the Parish Council are in favour of this application. How can you turn down one house but want to build another 100 or more? The school is fully subscribed and can only take in15 per year. A	 measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions approximately 800 additional dwellings to 'Other Settlements') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of
	resident in the village has a child that they wish to send to the local school but are told it is fully subscribed so how can you say there is room. It has recently been extended to accommodate more classes but is still full. The plan says we do not have a flooding problem so how is it that six residences have had to be evacuated because of floods. Some do not expect to be back in their houses for at least eighteen months. Another resident is still in his house but cannot use his	growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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	lounge and hall until all the plaster has been stripped off, walls dried and re plastered plus furniture and flooring renewed. The bend on Main Street near to Derrys Nurseries is not suitable for traffic to use from the proposed houses as Main Street and Cossington Road Sileby are bottle necks early morning and evenings so all traffic would have to come out onto the Humble Lane from one plot and Syston Road for the other. Syston Road has a speed limit but it is totally ignored. Bennetts Lane, Back Lane and Humble Lane are not suitable for more traffic. They have no footpath except near the railway bridge and no edges to the road so vehicles now run over the verges when passing other traffic. The building will cause big vehicles to use it. When using Bennetts Lane and Back Lane it is impossible to pass oncoming traffic without stopping on verges to let vehicles through. Children from Middlefield Road have to use Back Lane to get to the village school. For seventy houses you can expect 210 vehicles to come off the estate. That is not counting service and delivery vehicles. The drainage through Main Street near Syston Road is very poor. This year not only was Syston Road impassable near Cossington Mill it was flooded near Main Street which caused a very large pothole to appear. The water in this area came off the fields and carried on draining for weeks. It damaged one house and ruined a garden at the top end of Main Street. The manhole covers were lifting off the manholes in that area. Sileby doctors will be full with 1000 houses being built there so we have to use Syston for our doctors but there is not a bus service to get there and we have to wait for appointments as they are very busy due to houses being built in Syston. New residents came to Cossington to live in a small friendly village where we know one another not a village with two estates and social housing. We realise that once the village loses its identity the value of our homes will drop. Who will compensate us? We are very short of parking spaces a	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority. Impacts of development on landscape, green space, and biodiversity have been considered as part of the site assessments. Any future proposals will be assessed, and any impacts would be mitigated appropriately.
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	heavy rain storm. This also applies to Leicester City Football Club who are partly in our Parish but on higher ground so water will flood down even if holding ponds are built. Cossington has a lot of cyclists and walkers who will be in danger on Platts Lane, Back Lane, Bennetts Lane and Humble Lane. Traffic from Humble Lane who need to get to the A6/A46/M1 will obviously go down Back Lane and onto Platts Lane and then Syston Road whatever the road signs tell them. We cannot understand how new houses will bring wealth to the village as the only place they can spend their money is the Royal Oak which is not very big or the two garden nurseries. I trust you will preserve Polly Peggs and Crab Tree Lane as they are part of our history.	
LDCLP/57 Mrs J M Kitching	 With reference to the draft Charnwood Local Plan 2019-2036 and for the proposals for future development in Cossington. The infrastructure in Cossington does not allow for any future development. The school is already full and has not been able to accommodate children living in the village, they have had to be sent to Sileby. The doctors' surgery in Sileby is already running to full capacity, and the access along Back Lane and Bennetts Lane is too narrow. In parts there is no room for two vehicles to pass. The Syston Road is extremely busy, and it would be quite unsafe to have access on to this road due to bends. On top of this Cossington has just had during October, the worst flooding in 21 years. Several houses were flooded throughout, and some occupants have been told by the insurance not to return within 12 months. Half of the village was flooded from Derry's Nurseries up to and beyond Bennetts Lane. It is evident that whoever wrote this report is not local, and as a local inhabitant of long standing I fully reject this plan. 	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
EDCLP/15 Jay Diamond	My email is regarding the proposed housing areas in Cossington. I would like to understand what consideration, if any, has been given to the sewerage infrastructure in Cossington. Having been affected by long term full capacity sewerage problems (and now for the first time river flooding) I have concerns as to how the village will sustain future housing, without affecting our and other properties again. A recent sewerage flood alleviation project (6 years in the waiting)	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Specific discussions are taking place with Severn Trent Water to establish the latest position on sewerage capacity, water supply, and waste-water treatment.

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	was intended to offer additional capacity at times of heavy rainfall, but has been running at full capacity for over a month now. I believe the project is based on a 40 year model, so additional housing and usage would only reduce this lifespan further. Your understanding and comments on this matter would be appreciated.	
EDCLP/18 Louise Turnbull	I am writing to express my deep concern at the draft plan which indicates 115 houses to be built in Cossington across 2 different sites.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	My concerns are as follows: A further increase in traffic through the village which has already increased substantially due to the developments in Sileby The effect on safety this traffic would have particularly on roads such as Humble Lane, Back Lane and Bennetts Lane. These	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	roads within the village are already unsafe in my opinion due to them being too narrow and having no footpath provision The developments in Rothley and Mountsorrel have also increased traffic along Syston Road which impacts this end of the village This proposed development would also put pressure on local	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	services many of which are not located within the village. It is my opinion that GP services in Sileby are already severely stretched by the recent development there and there has also been large developments in Rothley and Mountsorrel I am sure this will mean extra strain on primary and secondary education in this part of Charnwood	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	I am also concerned that building is being considered in a village which has had recent devastating floods. Surely further building means more difficulties with flooding for this community Overall I can see no advantages to this plan as we would appear to	
	have sufficient new built houses for local people as none of the villages mentioned above are far from Cossington and are easily accessible (apart from when floods cut the village off from other areas)	
	I trust my comments will be given due consideration in this consultation process.	
EDCLP/23 Gary and Debra Marshall	Draft Charnwood Local Plan 2019-2036: Plans for additional housing in Cossington We write to register our objections to the above development on several grounds.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	 Access. Access to the site will be onto Humble Lane which is a narrow road. Although classified as a road generally more than 4m in width, this is only the case at the top end from the junction 	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.

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	with Ratcliffe Road. Further west, on the other side of the railway bridge, this is not the case and it leads onto the single track roads of Back Lane and Bennetts Lane. This would be the main route to the A6 from the proposed site. Potentially, on an average car ownership of 2 cars per household, there will be an additional 150 cars travelling along these roads which will cause extra noise, pollution and danger as there is no footpath on either Back Lane or Bennetts Lane. In addition, cars travelling along Back Lane already pull onto residents drives to pass on a blind corner. This has already caused damage to those driveways. More traffic would increase the problem. Any change in access to Main Street would also be problematic as it would be onto a sharp bend in the road. This road is already too busy with traffic that travels too fast and a large number of HGVs bringing noise and pollution. There is also a public right of way alongside the rear of existing housing on Homestead Close. 2. Flooding. The Draft Plan states that Cossington does not have a flooding issue. Within the last 4 months (which has been over the summer period when there is generally less rainfall) there have been 2 incidents of flooding. One event was so serious that several homes were flooded and residents are not able to move back for at least 12 months until the properties have dried out. In addition, many more homes had lesser degrees of flooding causing anxiety and distress. In some cases, this was made worse by vehicles driving through the flood water causing a ripple effect which inundated homes on Main Street. Even when the road closed there were drivers who ignored the cordons to avoid the inconvenience of finding another route. In addition to the homes flooded on Main Street the flooding also prohibited access to Homestead Close. This meant that cars had to be abandoned – in one case a disability car with a disabled passenger – and residents had to walk either through floodwater several inches deep or around down Crab Apple Lane.	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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	 difficulties for deliveries of goods, emergency services and for commuters. Further development on this road would also add to surface runoff and exacerbate the problem. Community Services. The report states that there is plenty of room at Cossington School. This is not the case. New residents recently moving into the village have been unable to secure school places for their own children. In addition, new development in Sileby means that there will be additional pressure on Doctors surgeries. When we moved in 12 months ago, we could only get into a practice in Syston. This means a 10-15 minute drive and then appointments are only available a week or two in advance. There is no capacity for 110 more houses. The same applies to dentists. We had to be on a waiting list for 6 months before we could join a local NHS dentist as there was no capacity. As Cossington does not have a shop, residents already have to travel by car. The proposed development will nearly double the population of the village entailing more car journeys for essential every day goods. The report states that any new residents will bring wealth and spending power into the community. It is difficult to see where that wealth will be spent as the village only has one pub and two garden nurseries. Rather that wealth will be taken out of the local community and other settlements will benefit. Community. Cossington is already a commuter village. As there are no jobs in the immediate area, residents travel to work. This problem of extra car journeys and a lack of community during the day would be magnified by any new development. Residents have paid a premium to live in the village and such proposals would affect property prices having a detrimental effect on the environment by building on green field sites. 	
EDCLP/25 Kirsty Cunnington	I would like to object to recent proposal to build 115 houses in Cossington. I am a resident of Cossington. It is stated that there is plenty of room in the school which I know is not true. It has been said there is no risk of flood in Cossington but 3 weeks ago Cossington suffered large amounts flooding throughout. I cannot see how it is going to be financially beneficial as we have no shops or facilities. As for doctors we do not have a doctor's and have to travel to surrounding villages.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Further discussions are taking place with LCC to explore the specific issue of school capacity at Cossington. This information will inform further site assessment work, and the next stage of the draft local plan.
EDCLP/27 Tim Elson	I have just seen the draft plans for building in Cossington 2019- 2036. As I have resided in Cossington VILLAGE for the last 25 years I	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.

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	can not believe what I have just looked at regarding the 115 houses proposed at 2 sites. Has anyone considered the facts that the village roads would not cope with the influx of traffic this would bring. Bennetts lane and back lane are so narrow that it is only just possible to get 1 vehicle through at a time not withstanding the sharp blind bends on both roads which would be a danger to both motorists and pedestrians using the polly peggs public footpath along the back of Fisher close and homestead close. Also since the footpath along the side of back lane/ humble lane to the train bridge was installed a couple of years ago this has also narrowed the carriageway to a dangerous level where it is only just possible to get 2 vehicles side by side safely. Also the current situation regarding flooding around Cossington IE main street, Syston road and Cossington mill which was recently seen on the local tv news stations, would only be made worse by concreting over fields causing even more chaotic travelling conditions than we have at the moment, with Cossington being cut off from the A6 other than access through barrow upon soar (if not flooded itself) and the A46 bypass to the Syston hobby horse roundabout that is a deathtrap at the best of times, as I have witnessed on many mornings travelling to work. Cossington primary school where both my children went to is such a marvellous historic village school that there is no way they would be able to cope with the massive influx of new pupils as it already has to turn down applications for 3 sileby children to attend. There are no shops, doctors or services in Cossington which is one of the reasons people of the village enjoy living here and also raises another of my concerns. The neighbouring village of Sileby has just had a major development on Seagrave road and as my mother lives in Sileby I know for a fact that the doctors there are struggling to cope at present with appointment's, that even more residents in the surrounding area would only add to their struggle. Wh	The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions approximately 800 additional dwellings to 'Other Settlements') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The possibility of a new settlement was considered within the SA as part of four different 'high-level' housing growth scenarios / distribution options; and two 'refined' options. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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EDCLP/28 Pearl Morelli- McKeon	developed with schools, shops and a planned road system rather than try and add to present rural villages, devaluing homes in sought after locations. Cossington is a small rural village and needs to be kept this way. Thank you for letting us know about the Charnwood Local Plan. I would like to strongly object to any building work in Cossington. We have under 200 houses in the village and the idea of putting over 100 more seems like madness to me. There is a parking problem at the moment and Main Street is getting busier and busier all the time. People turn around at Derrys Nursery but that bend is dangerous. Access on to Humble Lane, Back Lane and Bennetts Lane is not suitable as it is way too narrow. There is only a small length of footpath over the railway bridge. There is no bus service to Syston. We only have one pub. Nothing else. No shop or any other business. So the idea of the residents of the new houses bringing wealth and spending power is non existent. We don't even have a doctors surgery and the surrounding ones are not taking on any new patients. Our small primary school is already full, with a waiting list. Cossington children cannot even get in. Parking at school time is horrendous and an accident waiting to happen. We have serious flooding issues. The drains simply cannot cope at the moment. We have had flood alleviation but nothing seems to work. Several residents have been moved to other areas for 18 months as the October floods were so bad. The manholes seem to lift in bad weather and sewerage is awful. The new Leicester City Ground won't help as it will take away absorption of water. So, in a nutshell, I do not want any more houses built in Cossington.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
EDCLP/44 Tim Carpet	As a resident of Cossington for the last 24 years wish to put my thoughts on your local draft plan for 2 new developments in our village. How can it be possible to consider these 2 sites as being acceptable for development as these will totally change the character of this small village. At present there are approximately 200 houses in our village and to add another 50% is ridiculous. I have not noticed development at that rate anywhere else. Has anybody considered the facts that there are no amenities in the village as far as shops etc and our local infrastructure could not cope with anymore properties. in your report you state that new residents will bring wealth and spending power to our community which I cannot understand as there are no businesses here and	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.

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RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY with building social housing may well take away the current wealth from this village!!! . Areas such as Qourn, Mountsorrel, Birstall and Syston have a far better infrastructure with shops, schools, and doctors and can take new developments. Your report also states that there is plenty of room at the doctors, which I presume is in Sileby. I know this not to be true as family members who live in Sileby currently struggle to get appointments there, so how will they manage with accommodating more patients ? The road system where these new houses are proposed are small narrow country lanes, especially humble lane, back lane and Bennetts lane which is where the proposed access is from. The traffic increase would not only be impossible but also dangerous to local residents living there at present, as well as pedestrians, as they are almost single lane roads allowing 1 vehicle through at a time. Main street itself is now becoming busier and busier due to the volume of traffic, to and from Sileby, due to the major developments that have already taken place there and are ongoing and also the traffic calming give way point on Mountsorrel lane in Sileby during peak times causing traffic backlogs resulting in people using main street as an alternative route. On 27th Nov there was an accident on the A46 at the Anstey turn causing a massive back log along Syston Rd with traffic from Syston, East Goscote and Sileby all trying to get to work. It actually took me 15 minutes to get out of Cossington. It was a good job that the mill wasn't flooded that morning.!!	OFFICER RESPONSE The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
	that morning.!! When I moved here 23 years ago, there was an application for a football pitch on the proposed site for 70 houses. This was I believe rejected due to the increase of traffic along the narrow lanes. Traffic has increased considerably over the last 23 years so how can this be acceptable now. IF houses have to be built in this area then surely it would make more sense to build opposite the old Cossington commercial's site on Syston road as there is a roundabout already there to allow access to a new estate, although it would not solve any of the issues other than keeping humble lane, Bennett's lane and back lane safer and less congested at normal times. Cossington primary school is a fantastic village school, where my children attended in their early years, has recently been improved but I know for a fact that it would not be possible to take new placements as this is currently a problem, as it has to refuse	
	application's from Sileby residents at present. During school times	

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	main street and homestead close becomes clogged with cars parked on the bend on main street causing buses to mount the pavements on occasions to get by the parked vehicles which is extremely dangerous. The car park that is used for parents to park, is on the opposite side of main Street to the school causing the parents and young children to cross the road which is also becoming more dangerous. The car park is only accessible when not flooded which leads me onto my next concern. Throughout the winter months Cossington has a flooding issue as we have recently seen in the local news and is getting worse. surely this would increase with the field being concreted over. Syston road around Cossington mill is often flooded due to heavy rain which makes the road impassable causing traffic from all surrounding areas to use main Street towards barrow upon soar to access the A6 bypass. The only other option is to use the A46 bypass and onto Syston using the hobby horse roundabout which is often blocked and is an accident blackspot. The present member of parliament for the Charnwood area Mr Edward Argar states in his recent flier on the latest news for Charnwood that "they want to protect our environment and oppose over development and it's vital we only build what our local towns and villages, and countryside can take WITHOUT CHANGING THEIR CHARACTER or over-loading local infrastructure". Cossington is a small village and does need development. [Redacted]	
EDCLP/47 Andrew and Samantha Crane	 I am writing to give my views and my disbelief over the proposals for the housing sites in Cossington for the following reasons: 1. Your report states that there is plenty of room in Cossington School, when in fact there is only ever 15 places allowed each year and to my knowledge these are always taken and we even hear examples of Cossington Children not being allocated a space. 2. There are plenty of places at the doctors, too be honest as a resident of Cossington, I find it hard to obtain a suitable doctor's appointment and whenever I do visit the surgery the phones are ringing off the hook and always appointments are running late. I did hear that it was also proposed that a further 1000 houses were to be planned for Sileby, surely this would completely overload an already very stretched practice? 3. I do not see how any development in Cossington could bring any wealth or spending power to the community as we 604 	 The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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	 only have a small country pub and no other amenities. 4. The most important point is over the flooding issue: I am sure you are aware Cossington has suffered a huge amount of flooding recently and houses have been evacuated and residents told that they cannot return for 12 to 18 Months to allow the moisture to subside, the village remains effectively cut off at several times of the year due to Syston Road flooding (your records will show how many times highways has to put out road closed signs). The other way to the A6 via Mountsorrel is also inaccessible during this time as slash lane and Mountsorrel lane floods near the hump back bridge. Our village was so flooded recently that it featured on the National news, so to say the village isn't under threat from flooding is simply ludicrous. Surely building more houses to displace more water will only add to the growing climate problem. 5. Access going to and from Humble Lane, Back Lane, and Bennetts Lane is impossible and unfeasible due to the width of the road and seemingly no way to widen this road? The road is primarily single file and simply cannot take any kind of volume of traffic. All things considered I cannot see how a plan for any substantial development can be considered for Cossington village, this objection is purely based on factual and consequential issues with adding more houses and cars to the village. 	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
EDCLP/50 Edward Luker	 I contact you in relation to the proposed construction of 70 houses off the back of Bennett's Lane, Cossington [HS66]. I live on [redacted] and as a neighbour of the proposed construction I would like to object to the proposal. The report online, located on the Charnwood council website is wrong. There is not plenty of room in Cossington school the potential increase in numbers caused by the development can't be facilitated in an already high demand school. The doctors are struggling with current demand, let alone with the substantial increase from the planned sites in Cossington and Sileby. Cossington has a major flooding issue during the winter months, if this is not accommodated for, further construction will make this worse, not to mention the effect of increased traffic through flood 	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.

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EDCLP/53 Mrs Janette Bott	REPRESENTATION SUMMARY restricted roads. Back Lane and Bennetts Lane cannot handle the substantial increase in traffic. Please reconsider planning permission on the site. I am very concerned that the plans to build more houses in Cossington is even being considered. [Redacted] There are no pavements along Back Lane and the road is really only single track. Back Lane is so narrow the driveways that join it are constantly being churned up by vehicles trying to get by each other. I personally have had a HGV pull up my drive to allow vehicles to pass. Vehicles have to negotiate very carefully especially when larger vehicles come down the road which then means that someone has to reverse back along the road to find a gap wide enough to pass. Planning to have more traffic using this road as access to a new housing estate is NOT a good idea and also using Bennetts Lane which again is a narrow road, with No pavements would be a nightmare. As far as I am aware, Cossington School in its present state could not accommodate any more children. When the new building was built there were quite strict planning regulations. The Doctors Surgeries in this area are very full and trying to get in is not easy. There is only the pub and Garden Centre in the Village that might benefit from people moving into the village. Earlier this year I had to wade Knee deep along Main Street to get home when the village experienced horrendous flooding which affected many houses, some of which will have to remain empty for up to 18 months, When the floods come up in the surrounding area, which happens numerous times every autumn/ winter, Cossington becomes almost completely cut off with only one road in and out and the traffic is so heavy and I can't even get out of my drive because of the increased traffic trying to find a way round. Please don't add to the current problems our little village is	OFFICER RESPONSE The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
	experiencing because even without more houses I see that it's not going to get any better.	
EDCLP/60	Cossington - Objections to Charnwood Local Plan 2019-2036	The SA considered and appraised a series of housing growth options
Alison Armstrong	I read with dismay the plans you have put forwards for overwhelming Cossington with houses with no improvement in local	and spatial strategy options.
	facilities/transport – in other words the Dormitory you wish to	The Second Interim SA Report notes that the 'Hybrid' option (with a

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 impose on Cossington. 1. I recognise the need for housing in the country. a) I favour small local gradual development of housing which does not overwhelm a community and fundamentally change its being (which is why people came there) and is keeping with the local architecture. b) I favour building that enhances the community and builds to increase access – eg in Cossington we do not have sheltered accommodation for the elderly so they have to leave the village – that would meet the village needs. c) I favour building communities – houses that encourage walking/cycling to events, places in the local community to meet – a hub/a café/a shop/a community hall/a church/a school and pub/a restaurant d) I am aware that too much local building has been houses with no hub and I am aware of loneliness amongst residents in new houses in nearby villages (Rothley) caused by large housing estates and no local facilities to go to meet and socialise. Cossington has a vibrant community which do our best to meet up and have village events(we have to meet in someone's village house as the village hall doesn't have the facilities) – I would not want to lose our community spirit. e) As a cyclist and aware of health needs of the population I favour developments in local public transport that takes people to where they need to go, allows people to walk and cycle safely and use public transport. f) I favour measures that will reduce the impact on the climate which by 2036 will be paramount. h) As a Cossington resident I am aware of our flood risk – from the fields – more so since the recent flooding affecting Main St at one end of the village- this must be 	 spatial strategy that apportions approximately 800 additional dwellings to 'Other Settlements') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. Draft Policy LP1 sets the overall strategy for the delivery of housing, economic, social, environmental and infrastructural needs. This policy will work in conjunction with LP2, LP3, LP4, and LP6 to deliver the right type, range, and tenure of housing; in the right places, across the borough. The impact on heritage and the conservation area is known. The implication was recorded in the SHELAA and SA assessments. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority. The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. The SFRA will also consider matters of drainage, and the site assessments have regard to surface water drainage issues.

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However you have focussed on building houses anywhere any how. You have NOT commented on how your building plans will enhance communities(putting in facilities) NOR how they will enhance healthy living (Walking, cycling) NOR how you can build to lessen the effect on climate change(reducing cars and building a sustainable transport system). Mostly you comment on the effect of the plans on the above. The plans are therefore deeply disappointing and lacking in vision for the future of our neighbourhood.

I note that you have commented on the effects of the employment, environment, climate change and road transport, education and health above on any building plans but I do not reach the same conclusions as you do.

1) THE PLANS

i) Number of houses

a. Disproportionate load on smaller villages

I note you have assigned 100 to a number of "smaller" villages. 12 in all(excluding Swithland spared any houses). These villages vary in size from 600 people(Cossington, Thrussington),800 (Burton on the Wolds, Thurcaston) 1000 Wymeswold, Newton Linford, Rearsby) 1500(Woodhouse Eaves) 2326(Queniborough). **100** houses in Cossington represents an increase of about 53%whereas for Queniborough 100 houses is about 13% increase. This number will overwhelm the village.

Why isn't it proportionate to population? If it were then we would be considering around 30 houses in total- which would be much more manageable.

b. Character and Conservation area- this will be destroyed.

You talk about retaining this but this will be destroyed if the village is overwhelmed by an increase of over 50% in village size and this will destroy the essence of Cossington.

c) Why if 100 houses are proposed do you plan for 70 and 45(115)- that is more than 100 – and there is a discrepancy in the document for the smaller site is it 45 or 54? – which would be (124)?

ii) Density of Houses

 a. Density in Area by School (70 house site)is over twice nearby density – like a city.
 Density in other site comparable with village-

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	 Why? We are a rural area and we need all sorts of houses but the density of housing proposed for near the school is over twice the density of the nearby modern housing development of Fisher close. This looks like city housing in a village and will destroy the feel of the village. Why can't the density be similar to what we already have. I note the density at the other site off the Syston Road is similar to Fisher close – so if you can do it there – why not on both sites b. Screening You talk about screening the development behind the school – what are you screening it from – the village – the countryside? Please explain. iii) A Dormitory a. You are NOT building a community you are building a DORMITORY- the last thing anyone would want. b. You correctly comment that local facilities are POOR we have a school, a church a pub- our church hall is 60 years old-has asbestos was built when the village was smaller and is in terminal decline. c. 60 years ago we had a post office and a shop-and a restaurant at the mill – now we have none and only basic food at the pub d. Anyone coming to the village will have to go OUT to do ANYTHING- shopping, the doctors, a café, all childrens activities except one pre school club(s Brownies and Guides and scouts and ballet etc)and restaurants. So all you are doing is INCREASING traffic – how is that meeting the Climate change targets and sustainable travel and healthy living(walking and cycling)? e. Larger villages than ours – eg Thrussington have a shop/café at least- some have lovely restaurants too. f. Thurcaston I note has had a village hall built with a 50 house development and that village is just a bit bigger than ours. g. You cannot increase us from a village of 600 to about 1000 without creating a hub – a doctors surgery, a café, a shop. And a village 	
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	 hall big enough for the village. NOWHERE IN THE DOCUMENT DO YOU EVEN CONSIDER THIS iv) Type of Houses a. If you want to build a community – which I do – we need houses for people at all stages of their life. What Cossington needs is houses for older people so they don't have to leave the village when they get infirm- eg sheltered housing complex or even a residential area. Not sure about houses for singles- do not think young singles would want to live in a place like Cossington. Not sure I can see any consideration of what the village might need on the plan 	
	 2) Climate Change Flood Risk a) You say our village is relatively low and only affects one area.(7.5.24). We do not flood from the river – but we do from the fields above. TRY BEING IN THE VILLAGE ON Oct 1st AND TELLING US THAT. The risk of building new houses is not only about flooding risk for the new houses but also those which exist and which are at increased risk by the lack of a soak away. YOUR LACK OF UNDERSTANDING HERE IS VERY WORRYING. 	
	 b) This is the second time in 20 years that the village has flooded. The vaults built on the car park were wholly ineffective(meant to cope with 1 in 100 year event) and were full in 20 mins. The issue is the run off from the fields. Any more building in Sileby up the hill affects Cossington and any building on the fields above the School risks the entire village. c) Its not only that site which may increase the risk – the Drainage off the Syston road site is down Main St to the Cross roads with Platts lane(slope is down to cross roads) – so if that soak away is removed- then the river there will increase and likely the drains will fail to cope(they were already coping 	

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	 with a river off One house in Main St and the run off from the fields which is an informal stream at the end of the village). If those drains fail then the houses at the cross roads will flood again as they used to. d) BEFORE WE BUILD ANY MORE HOUSES WE NEED TO HAVE THE FLOODING IN THE VILLAGE ADDRESSED FIRST AND FOREMOST. ii) Carbon Footprint a) There are no footpaths on Bennets lane or Back Lane, and you cannot make on either with the topography. There is no foot path on the Syston road and the only path on Main St is on the opposite side of the road. We have already had children injured crossing the road between parked cars. You are building houses with no safe walking so people will use their cars. How does that meet climate change or healthy living. I DO NOT THINK YOU CAN PASS THIS OFF WITH ELECTRIC CARS WILL SOLVE EVERYTHING AS YOU DO IN THE DOCUMENT. b) There is no safe cycling route to Sileby, Rothley – and the cycling route to Syston is along the canal – Ok until you are returning with a large amount of shopping (not safe – done it ONCE). Cars are parked all over the road in both Cossington and Sileby you have to weave in and out of the traffic. It is only One way when a car is parked – which is most of the journey into Sileby(do it regularly on a bike). Increasing the traffic will make it increasingly unsafe – YOU NEED TO ADDRESS CYCLING AND YOU TALK ABOUT IT BUT ARE QUITE DISMISSIVE OF THE NEEDS OF THE AREA. YOU NEED TO MAKE IT SAFE FOR TEENAGERS TO CYCLE TO SILEBY. iii) Sustainable travel a) Bus Travel Yes every 30 mins to Leicester – not bad travel straight there. However to Loughborough though the frequency is every 30 mins – the journey takes about 40 mins – as it takes an eternal trip round Sileby – who is going to use it- when it is 15 mins to drive. YOU NEED TO FIX THIS 	
	b) Travel where people want to go	

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	There is no bus to Syston where many people go to shop. Sileby shops are quite poor for the size of the place – two very small supermarkets despite all the building in Sileby. I shop in Syston not Sileby for everything except the Butchers. So do many others – if you want sustainable travel – we need a bus to Syston (as there used to be) For many in Cossington our Doctor is in Syston – we need transport to Syston. (which you do not consider making an assumption about Sileby without looking at the facilities) You cannot get to to a gym or swimming pool by Public transport from Cossington(these are in Mountsorrel and Syston- fixable by a bus or train station) c) Train Travel If you really want sustainable travel Cossington needs a station again (it used to have one. The bus to Leicester doesn't go to the station there is a 15 minute yomp across town. So if you want people to use public transport then you need to connect us up to the Rail network and connecting trains. At the moment its either drive or walk to Sileby or get a taxi – walking to a station would be much better. 3) Road Transport i)ACCESS to SITE	
	 a) The larger site has access off Bennets lane. Bennets land and Back Lane which lead to the village and to the main route out of the village are SINGLE track roads. There is NO facility of widening them- so the traffic down those roads would increase by about 5 fold. The road just will not cope without severe congestion. This would make those of us here our lives miserable. b) General road Conditions As alluded to above there have been no road improvements in Cossington and Sileby despite huge building projects in Sileby. There is parking on the road in both Sileby and Cossington. The roads are effectively one line of traffic only as cars park on the road and it will not take two cars in each direction. Any more cars will increase congestion – pretty bad in rush hour already. 4) Education i) You state that Cossington school is available for new families to send their children to. WRONG - Cossington school is already full –There are children who come from the Cossington end of 	

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	 Sileby – but they cannot go to Sileby schools as they are already full. Cossington school could not cope with any more children. This development may bring potentially another 50 children. If they cannot go to this school their parents will be in the car driving to other villages – That's not environmentally sound policy. Health You state that there are Doctors surgeries in Sileby. There has been no increase in Doctors facilities in Sileby with the increase in the estates – They are already crumbling under pressure– How would they cope with another 300 -400 people? Some of us go to Syston but there is no bus and Syston has grown massively too. We need increased Doctors facilities before more houses – and how about a branch surgery in the village to stop people going in their cars. Wealth to the Village You consider the buildings will bring wealth and prosperity to the village. HOW? There is nothing in the village to spend money on – only the pub. The village stands to gain nothing by the development except poorer access to schools, busier roads, less safe roads, being overwhelmed by a dormitory estate.	
	ii) Employment There is virtually none in the village except the pub and the school.	
	Everyone goes out for it – with no train station they use their car to get to where they need to. All the building will do is increase the traffic and pollution. Please look again at your plans. You can be more imaginative and creative and not just build houses but build communities.	
EDCLP/66	I have been a resident in Cossington for well over 20 yearsvery	The impacts of new development, and the implications for infrastructure
Sally Elson	happy years. I worked hard to move to this SORT after village. I wasn't given any helping hand and have spent time and money making this house my home.	capacity, have been considered as part of the IDP and individual site assessment work.
	You are now proposing to build 115 houses in a village that has at present approx 200 making our village a third larger, when guidelines show this more than what should be proposed. In 1996 plans were proposed for 1 of the said sites to build	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	housesand then football ground.	A transport assessment has been undertaken to assess the impact of

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	The issue hasn't gone away and THE TRAFFIC HAS NOW MORE	growth on the roads in Charnwood. Further transport modelling will be
	THAN TRIPLED WITH BIGGER HEAVIER VEHICLES TRYING TO	undertaken as the plan progresses to refine the package of mitigation
	GET THROUGH.	measures required to manage the impact of growth.
	Both proposals were not passed due to the <u>access and volume of</u>	The Council is propering a Sustainable Transport Study, this response
	traffic. How can this be passed now, seeing that the problem is far worse.	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport
	In 1996 the Village school was classed as full because my child	measures and infrastructure will be explored, subject to an analysis of
	had taken the last place due to our move, meaning that 1 child had	demand, cost, timescale, and delivery.
	to be turned away from a surrounding village.	
	Since that time new building work has taken place at the school but	Access arrangements will be finalised as part of the next stage of the
	no more class rooms were built. MEANING THE SCHOOL ISN'T	local plan. Any access arrangements would need to satisfy technical
	ANY BIGGERSO HOW CAN THAT COPE WITH EXTRA	requirements and be approved by the Highway Authority.
	PUPILS, also taking into consideration the extensive development	
	in Sileby, with a new site on Ratcliffe Rd in processso more	Impacts of development on landscape, green space, and biodiversity
	pupils will put an even larger strain onto traffic problems already	have been considered as part of the site assessments. Any future
	existing in this tiny village, which isn't coping with SCHOOL RUNS	proposals will be assessed, and any impacts would be mitigated
	etc at present. MAKING Homestead Close and Main Street an	appropriately.
	even busier area with the VERY WORRYING PROBLEM of accidents happening, especially on Main street. The car park	
	provided for over spill is in such a position that crossing from one	
	side of road to another is extremely dangerous and the fact that is	
	floods makes it a non parking place at that time.	
	The proposed 70 houses on the plan are directly to the rear of	
	Homestead and Fisher close. This then must be Stage 1with	
	obviously bigger plans for further housing for the future, seeing as	
	how the plan show's all houses located close to the rear of	
	Homstead Close, Fisher Close and Bennets Lane, properties.	
	Access to and from this said site would be via Humble LANE to	
	BACK Lane. Its A LANE which means it isn't A ROAD and at many points along the route, 2 vehicles struggle to pass each other	
	without damage being caused. Once you are on Back Lane, some	
	houses sit very close to the road, there isn't a FOOTPATH because	
	of this. FACT THIS ROUTE CANNOT TAKE LARGE AMOUNTS	
	OF TRAFFIC AT ANY POINT, let alone more pedestrians, taking	
	their life at their own risk.	
	The area in and around Cossington is well known for flooding and	
	has been well publisized over the past few months. Flood elevation	
	work has been carried out but this has only transferred the problem	
	to further down into the village. The last flood caused both ways in	
	and out to be closed. Making access impossible for the villagers but	
	also putting more strain onto surrounding roads and villages making it very difficult for roads users to use to and from.	
	making it very unificult for foaus users to use to and from.	

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RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY With flooding comes other issues, the roads have small drains with grass growing from them and granite chipping filling them. Also the increase in volume will only make roads in and out requiring even more up keep or replacement. The Arable land is being taken away and replaced by concrete, this is the a serious problem but they still want to build here. A great example is the A6, with new roads built to join villages to. No thought was given to any of the surrounding areas, most of these roads slope down, causing flooding far worse than ever before, at no point is there any flood over spills to take the access rain due to the replacement AGAIN of the ARABLE land to Concrete. Yet you want to add more houses here!!!! In both proposed areas there is an array of wildlife that is on the declinea lot to do with building in rural areas buzzards, many different hawks fieldfare, bull finch goldfinch rabbits hedgehogs Voles, field mice, newtsand many more. WILL ALL BE AT RISK How can more housing help thatit won'tYet more species will be driven away and possibly become extinct. We do not have a shop or any local amenities, so bringing wealth to the area is ridiculousAll this will do is drive the wealth that is already here away and the people coming in, a large proportion of which won't be bringing wealth with them, because the government are providing their accommodation. As I have worked for the police, adding affordable housing <u>WILL BRING</u> more issues than the council/government could possibly image. Crime being a large concernTHEFT already can't be covered due to government restrictions, so drugs and vandalism will only make our area a far easier target. We are proud to have a neighbourhood watch system in place and are very grateful to these volunteers but a feeling of unrest about these new houses is concerning, as they would be expected to cover more areas, possibly ones that they may feel more threatened to venture too and life's being put at r	OFFICER RESPONSE
EDCLP/67	THAT IS AFFORDABLE. Thank you for giving the Parish Council the opportunity to write	The impacts of new development, and the implications for infrastructure
Cossington	their views regarding the Charnwood Draft Local Plan.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site
Parish Council	Whilst the Parish Council do not wholly disagree with the plan to	assessment work.

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	include new building in the village one site in particularly concerns us. This is site 1. It has been suggested that the access to the site will be from Humble Lane. Humble Lane is little more than a single-track road in places. To turn left from the site in a short distance is a narrow bridge with a dog leg and turning right the only access through the village is along Back Lane and Bennetts Lane. These are both single track with no passing places except to go on people's drives and children walk to and from school along Back Lane which will be busy times for people leaving the new estate. We also trust you will preserve Polly Peggs and Crab Tree Lane as they are part of our history.	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. The SFRA will also consider matters of drainage, and the site assessments have regard to surface water drainage issues. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	Cossington has a lot of cyclists and walkers who will be in danger on Platts Lane, Back Lane, Bennetts Lane and Humble Lane. Traffic from Humble Lane who need to get to the A6/A46/M1 will naturally go down Back Lane and onto Platts Lane and then Syston Road whatever the road signs tell them. The bend on Main Street near to Derry's Nurseries is not suitable for traffic to use from the proposed houses as Main Street and Cossington Road Sileby are bottle necks early morning and evenings so all traffic would have to come out onto the Humble Lane from one plot and Syston Road for the other. Syston Road has a speed limit, but it is totally ignored. The plan says we do not have a flooding problem so how is it that six residences have had to be evacuated because of floods. Some do not expect to be back in their houses for at least eighteen months. Another resident is still in his house but cannot use his lounge and hall until all the plaster has been stripped off, walls dried and re plastered plus furniture and flooring renewed. We feel that water from the Peashill estate will run down into the brook which crosses Main Street but it is not big enough to carry a heavy rain storm. This also applies to Leicester City Football Club who are partly in our Parish but on higher ground so water will flood down even if holding ponds are built. The drainage through Main Street near Syston Road is very poor. This year not only was Syston Road impassable near Cossington Mill it was flooded near Main Street which caused a very large pothole to appear. The water in this area came off the fields and carried on draining for weeks. It damaged one house and ruined a garden at the top end of Main Street. The manhole covers were lifting off the manholes in that area. During the recent rains water has been running off the proposed	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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	 building sites flooding the land of the properties further into the village. The supporting document says that Cossington does not have a flooding issue. This would be funny if it wasn't so tragic considering the boats along the Main Street and those people who will not be returning to their homes for a year due to the floods. The comment that there is plenty of room in the primary school is untrue. There is a child who lives in the village and there is no room for them in the school. If one child cannot get in, how will the possibility of another hundred be accommodated. There is no Doctors surgery in the village, so again, how can there be plenty of spaces. Classification – The Parish Council don't think Cossington should be classed as an 'Other Settlement'. These are settlements that have some of the services and facilities to meet the day to day needs of the residents. Unfortunately, we do not have such services – no shops and few businesses, just a pub, garden centre and a primary school (which is oversubscribed). We should be classed as a 'Small Village or Hamlet' – A settlement that has limited services and facilities to meet the day to day needs of the residents. We as a Parish Council are concerned that current residents cannot get planning permission to infill with houses on their own land yet people who do not actually live in the village can build over 100 houses. This does not seem fair or ethical. In summary, the potential proposed number of houses compared to the size of the existing village. Taking into account the issues we already have with flooding, traffic flow, dangerous parking (during the school run period) and speeding, the additional traffic flows would cause severe additional problems. We do not have the road infrastructure (some parts single track), or the ability to create an acceptable infrastructure, to cope with any additional traffic, whether generated from the village or additional throughput. 	
EDCLP/70	I wish to comment on the proposed development to include 70	The impacts of new development, and the implications for infrastructure
Helen McCague	houses on fields adjoining Cossington village with access from Back Lane [HS66]. I wish to oppose this development on the following grounds: My primary concern is the impact that the proposed development	capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been
	would have on the flooding risks within our village. We were recently unlucky enough to have suffered a severe flooding event in Cossington, primarily but not exclusively at the end of Main Street	informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.

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	on to which this development would be built. Many people have still not returned to their homes after severe damage to their properties and many more suffered problems to a lesser extent. As someone who lives at the far end of Main Street where this development is proposed I can assure you that a huge part of the flooding problem emanated from the brook which flows from Derry's carpark and in to the fields behind our property. To further reduce the drainage from these adjoining fields can only serve to increase the risk of this happening again. Mr other main concern is the access in to the proposed development from Back Lane. This will have a disastrous effect on traffic flow through our narrow village streets. Traffic wishing to enter this estate from Sileby or Cossington direction will be forced to either cut through Bennett's Lane or follow Back Lane from the crossroads with Main Street. Both roads are too narrow to accommodate two cars travelling in opposite directions. More importantly, neither of these streets have footpaths so pedestrians will be exposed to increased risk if traffic increases. These roads are simply not suitable to be used as access. Obviously, access from Main Street would be impossible because of the nature of the sharp bend as you enter / exit our village. I would ask Councillors to come and walk these roads themselves before making any decision as to the suitability of this entrance. Incidentally, if traffic were to enter via Humble Lane it means more cars using the very sharp bend with poor vision that adjoins the railway bridge. I appreciate that the Council has an obligation to provide more housing but I do think that proposing this development in Cossington after so many people have suffered due to the flooding is ill-judged and I would ask you to re-consider the suitability of this project.	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
EDCLP/79 Matthew Elson	I am writing this email to express my concern regarding the recent proposal of additional houses to Cossington Village. [redacted] I find the proposal astonishing, having lived there for a sustained period I feel it appropriate to raise my concerns formally and as detailed below: The road network in the village is strained at the best of times, cars are parked down Main Street at all time of the day, essentially making this a road with 1 lane, to cope with traffic flowing frequently in both directions. The proposal to add circa 70 houses to the plot between polly pegs footpath and the train tracks is, brutally, madness. Humble lane is treacherous during wet/damp conditions have blind turns in 3 places, to access humble lane you have to	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.

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	approach via back lane and Bennett's lane, both of which are impassable for 2 vehicles at the same time. The national average of cars/vans per household (2017/18) is 1.4. Therefore a potential of 98 additional vehicles using those roads will create virtual gridlock, spilling back onto Main Street which would then affect access to and from Sileby. Bringing me to my next point. Flooding to the village, documented recently in the news, meant that the village became impassable. Vehicles and individuals were trapped on streets unable to vacate, if someone was in need of medical attention the emergency services would not of been able to swiftly and safely attend to the people of Cossington. 'Cossington Mill' floods easily, denying access to the A6 and Rothley, Mountsorrel lane, Sileby, floods regularly, denying access to the A6. Individuals can not access a main artery of Charnwood's road network, traffic is then diverted through Cossington increasing volume. To then aim to increase the village by circa 200 houses, based at 1.4 vehicles per household is bringing another 280 vehicles at a time when the infrastructure cannot manage as it is. Cossington Village, has few amenities, nothing other than a pub, a church, a school and a post box. Based on an average of 2.39 people per household in 2017, an additional 478 people are planning to reside in Cossington. Sileby, Mountsorrel, Barrow, Rothley, neighbouring villages, have multiple shops, pubs and schools and can therefore cope with the increase in population, Cossington simply can not. Thank you for taking the time to read my concerns.	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority. Impacts of development on landscape, green space, and biodiversity have been considered as part of the site assessments. Any future proposals will be assessed, and any impacts would be mitigated appropriately.
EDCLP/80 Historic England	HS65 - The site is south of the Conservation Area with the potential to erode the existing grain of the village and impact upon the Conservation Area, close to burgage plots and there is the potential for archaeology.	Draft Policy LP3 sets out that any proposals for the sites in Cossington should respond appropriately to the area's sensitive context of the linear village and its landscape setting. The impact on heritage and the conservation area is known. The implication was recorded in the SHELAA and SA assessments. This response will inform further site assessment work, and the next draft
EDCLP/81	I do not agree with the proposal for new housing developments in	of the local plan. The impacts of new development, and the implications for infrastructure
Carolyn Jones	Cossington Bennetts lane cannot cope with extra traffic it is a narrow lane There has been flooding issues in Cossington recently a few	capacity, have been considered as part of the IDP and individual site assessment work.
	months ago Houses were flooded and residents have had to leave their homes new development could make this worse	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk
<u>L</u>	f their Herries Herri development essite matter the verse	

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	The School in Cossington is full new children who have moved in to the village in the last few weeks have not been able to get a place The housing developments in Sileby will put too much pressure on Local GP services Cossington cannot cope with the proposed development it will change the character of the village Please take my comments into consideration	 evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical
EDCLP/84 Mr Pat Somi	 I am writing to express my concern regarding the proposed sites for housing as part of the Charnwood Local Plan 2019-2036: HS65 Land west of Main Street and north of Syston Road Cossington 54 HS66 Land rear of Derry's Garden Centre Cossington 70 You mention 3 points in particular that I would like to challenge: Managing Flood Risk: The draft policies seek to direct development to those areas where flood risk is lowest, reduce the impact where this is not possible and deliver sustainable drainage systems to manage water flows. Road Transport: The draft policies seeks to ensure that the impacts of development on the highway network are mitigated appropriately and appropriate car parking is provided. Sustainable Travel: The draft policies seek good walking, cycling and public transport links and charging points for electric vehicles to be provided on new developments. So far this year we have been unable travel to and from work using the easiest route on at least 8 days due to flooding. The flooding is on Syston Road where you are proposing to build 54 houses. How will they be able to leave / enter their homes if the roads are flooded? Currently when the road is flooded, all other routes are impacted by the extra traffic resulting in long delays. Even the 70 extra houses will make these delays worse. Both Bennetts Lane and Back Lane have no pavements. In parts they are both only accessible by one car, forcing a vehicle 	requirements and be approved by the Highway Authority. The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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EDCLP/97 Marrons on behalf of Clarendon Land & Development Ltd	 coming the opposite direction to pull over so they can pass. How will we as residents be able to walk around our village if there are extra cars forcing their both ways on these roads? I imagine more long delays due to the number of cars trying to enter and leave the village. Humble Lane is also a road with dangerous bends and tights corners that are not ideal for cars from an extra 70 houses. Platts Lane is also not the easiest road to navigate, especially in the dark. 3. There is only one bus that runs through Cossington. Currently the service is poor due to breakdowns. The bus doesn't run at all in the village when there is flooding. I do not understand how this can be described as good public transport links. As a general point, there are no facilities in Cossington and as such any extra housing will put extra pressure on resources in Sileby in particular and there are already current and future plans for extra housing here, with no plans for extra facilities. It seems quality of living isn't a consideration with these plans. Roads need to be improved, flooding prevents and bus services increased to be able to cope with the extra housing proposed. Land rear of Derry's Garden Centre, Cossington [HS66] The Landscape Sensitivity Assessment of SHLAA Sites (March 2019) forms part of the evidence base for the Draft Local Plan. It is noted that the allocation at Cossington and the land eastwards up the railway (defined as site PSH260) is defined, by the report, as a "developable site" and is assessed to be no more than of "moderate" landscape sensitivity. The Draft Plan recognises that communities in Charnwood have increasingly become concerned about their identities as separate places (paragraph 7.12) and that the main purpose of Areas of Local Separation is to preserve settlement identity based on landscape character, the visual appearance of the area and maintaining landscape connectivity. The Charnwood Green Wedges, Urban Fringe Green Infr	The proposed allocation is based on the landscape sensitivity assessment evidence, and the analysis of the role and function of the ALS. The information in this representation will be used to inform further site assessment work, and the next stage of the draft local plan. Further landscape assessment work is being carried out, and the work will consider the issues raised in relation to the interface between the strategic landscape open space and ALS9. The scale of development at the allocation is based upon the analysis and conclusions from the SA process. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions approximately 800 additional dwellings to 'Other Settlements') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
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	2016 Study reviewed the original Area of Local Separation between Sileby and Cossington designated through the Borough of Charnwood Local Plan 1991-2006.	
	The Study considered the Sileby-Cossington Area of Local Separation as ALS-D. The Study noted ALS-D to be bounded by defensible features to the north, south and east, consisting of the hard settlement edge of Sileby, a small brook and the railway line. The boundary to the west is weakly defined and does not appear to follow a logical or readily recognisable feature. In considering alternative boundaries it found that:	
	"The western edge of ALS-D should be realigned to the stronger alternative boundary features consisting of dense tree and scrub vegetation at the edges of fields". (p.68).	
	However, the Study also considered the 'purpose' of ALS-D and concluded it to be Moderate - provides the gap between Sileby and Cossington, preventing further ribbon development along Cossington Road and ensuring that the integrity of the gap is maintained. (p.43)	
	The Study recommended that the "Designation [be] retained and extended to strengthen boundaries to the south-west. This change would also enhance the integrity and logic of the designation and ensure the narrow gap between Cossington and Sileby is not compromised." (p.86).	
	To re-iterate, we do not object to the principle of ALS4. However, it is our view that the boundary of allocation HS66 has been drawn without regard to defensible physical boundaries or coherent landscape features. We note that Council's assessment of the Area of Local Separation recommended an extension to ALS4 to the south west (which has been implemented for the proposed designation) but did not recommend an extension to the south/south-east beyond the brook and vegetation that provides the boundary of existing designation or the proposed ALS4.	
	Whilst there may be a case to manage the periphery of any built development that takes places within the allocation that should, ordinarily, be considered through a master plan approach which seeks to understand the relationship between the Area of Local	

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	Separation, the landscape features provided by the brook and in this case the brook and vegetation that provides the boundary of ALS4.	
	The Draft Plan proposals map (p.128) shows that the boundary of the allocation has been drawn to not only leave designated countryside between the south-eastern boundary of ALS4 and the north western boundary of HS66 but to also provide for a buffer around the allocation (identified as Strategic Landscaping Open Space within allocations). Similarly there is designated countryside between the north east of the HS66 boundary and the field boundary and also to the south west of the HS66 boundary and Humble Lane with the buffer also extending around these sides of the allocation (see Appendix A).	
	Neither the commentary in the Area of Local Separation Study or the Draft Local Plan reasoned justification explain the rationale for drafting the HS66 allocation boundary in this way. The Area of Separation Study was clear that ALS-D (what has become ALS4 in the plan) should not be extended further south/south-east. The Draft Policy LP3 text is clear that development should clearly maintain the physical separation between the built up areas of these settlements. Draft Policy LP3 recognises only the Charnwood Forest Regional Park as an area that it deserves mention as an area for particular protection. The use of a buffer within the allocation in relation to the Area of Separation is understandable but why there would then be a 'stand-off' area of designated open countryside in addition is not clear, particularly in the absence of evidence to justify that decision.	
	The effect of the above will be to contrive a buffer of strategic landscaping together with a narrow gap of land with no economic purpose which together could result in an awkward relationship in a sensitive area where the transition from Sileby, through the ALS and beyond the brook to Cossington will, as a result, lack coherence.	
	An indicative layout has been prepared for Clarendon Land Ltd and is attached at Appendix B. The layout appropriately respects the area shown for built development by the proposed allocation boundary for HS66 and manages the landscape buffer through the provision of new strategic green infrastructure so it is coherent in its	

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	relationship with the brook and the boundary of ALS4 (to the north west), the field boundary (to the north east) and to Humble Lane (to the south). The layout responds appropriately to the area's sensitive context of the linear village and its landscape setting as required by Draft Policy LP3.	
	To clarify, the residential area that results from this is consistent with the extent of the allocation shown for HS66 on the draft proposals map in its relationship with ALS4, the field boundary to the north east and Humble Lane. However, the landscape buffer is slightly more extensive in the north west than the Strategic Landscape Open Space shown on the proposals map which allows for positive planning for the relationship with the brook and the use of this part of the site as multifunctional green infrastructure. This would comprise new planting and habitat creation to provide biodiversity benefits and new accessible green space for recreational pursuits. The landscape area to the north east and south west is consistent with the Strategic Landscape Open Space shown on the proposals map.	
	We also note that it will only be possible to access the site through the open countryside. Access to the north would be by connecting to Main Street through the Strategic Landscape buffer and by using land outside the allocation and within the open countryside. Similarly, to the south access would be to Bennett's Lane or Humble Lane again through the Strategic Landscape buffer and open countryside. An amendment to the allocation boundary to provide for these access options would be sensible.	
	If an amendment to the allocation boundary for access is not preferred, an alternative might be to provide policy wording that allows for transport evidence and a constraints led master planning to consider options for access arrangements and allow the local planning authority to take an appropriate view at planning application stage. As written the policy is not clear and is unambiguous and it is not evident how the Council should react to development proposals. The worse-case scenario is that as a decision taker the Council decides it does not wish to see the access through the countryside designation, effectively preventing the allocation from being accessed.	

The indicative layout attached at Appendix B delivers a build area

a s w 1	of around 4.14ha and we consider this to be consistent with the allocation boundary (minus Strategic Landscaping Open Space) shown on the proposals map. At 30 dwellings to the hectare this would provide for up to 124 houses. The layout also presumes access through the Strategic Landscaping and countryside to Main Street to the north.	
It pwb It wHS ir writin ir spyrie Vanth cir ptared	potential yield set out in Policy LP3 should be amended, although we note no descriptor (such as at least, approximately etc.) has been employed. It might be noted that at 124 homes, the potential yield for HS66 would be the same as the total amount for Cossington assumed by HS66 (70 homes) and HS65 Land west of Main Street and north of Syston Road (54 homes). HS65 presents something of a curiosity in that it is physically separated from Cossington and development would likely have an awkward and disjointed relationship with the main built form of Cossington; appearing as an isolated satellite to the main village. Such an allocation on separated green field land may not be palatable to the local community or a planning inspector. Given the potential to use HS66 effectively and provide sufficient numbers of homes to facilitate the 124 homes currently proposed for Cossington there is an opportunity to reassess the yield for HS66 and whether HS65 is needed in light of the potential risk of it not successfully negotiating the consultation and any examination. When considering the twin issues of delivery of sufficient homes and maintaining the separation of Sileby and Cossington we maintain the view that development of HS66 can be managed through a masterplan approach and green infrastructure strategy, having better regard to the boundary of ALS4 and that consequently, development on the site would not undermine the integrity of the Area of Local Separation and would maintain the physical separation between Sileby and Cossington. We are also of the view that it is appropriate to put the land subject of the allocation to effective use and that there is an opportunity to recognise the ability to develop a yield of up to 124 homes and in doing so consider whether it is palatable to delete HS65 which is	
9	green field land physically detached from the built form.	

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	CONCLUSION The Draft Plan identifies Cossington as an Other Settlement, capable of meeting the day to day needs of its residents. An appropriate amount of development is distributed to the Other Settlements and the allocation through Draft Policy LP3 Housing Sites at HS66 Land rear of Derry's Garden Centre appropriate and justified. The Draft Plan appropriately seeks to protect settlement identity including through the designation of Areas of Local Separation and designation of the land between Sileby and Cossington as Area of Local Separation 4 is supported in principle. The only matters between the Council and our client relates to the boundary of the allocated site at allocation HS66 Land rear of Derry's Garden Centre and the Area of Local Separation (ALS) in respect of the arrangements for Strategic Landscaping and the development yield for the site at 70 homes which we do not consider would make effective use of the allocation. Although of lesser concerns, we consider that in recognising the effective use of HS66 there is an opportunity to delete HS65 which is a green field site physically detached from the main built form and perhaps unlikely to be palatable to the community or a planning inspector.	
EDCLP/102 Simon Bates	Thank you for giving the residence of Cossington the opportunity to write their views regarding the Charnwood Draft Local Plan. As a resident on [redacted] I feel I must object to the proposed planning for new houses being built on your site 1 [HS66]. It has been suggested that the access to the site will be from Humble Lane. Humble Lane is little more than a single-track road in places. To turn left from the site in a short distance is a narrow railway bridge with a dog leg and turning right the only access through the village is along Back Lane or Bennetts Lane. These are both single track lanes with no passing places or pedestrian pavements. Children walk to and from school along Back Lane which will be busy times for people leaving the new estate. Increased traffic volumes along these roads is going to increase the danger to these children and anyone walking on these roads. Polly Peggs and Crab Tree Lane are a large part of the village history which we would not want to lose due to new developments. The plan says we do not have a flooding problem so how is it that six residences have had to be evacuated because of floods. Some do not expect to be back in their houses for at least eighteen months. The main Syston road floods every winter after periods of	 The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical

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	heavy rain causing the road to be closed for several days at a time. This combined with similar issues in Sileby on Slash lane and Mountsorrel lane virtually cuts the two villages off. During the recent rains water has been running off the proposed building sites flooding the land of the properties further into the village. The supporting document says that Cossington does not have a flooding issue. This would be funny if it wasn't so tragic considering the boats along the Main Street and those people who will not be returning to their homes for a year due to the floods. It appears that the comment that there is plenty of room in the primary school is untrue. Apparently there is already a child in the village that is unable to attend Cossington School as there is no room for them. If one child cannot get in, how will the possibility of another hundred be accommodated. There is no Doctors surgery in the village, so again, how can there be plenty of spaces. Speaking one of our local councillors I was told that The Parish Council don't think Cossington should be classed as an 'Other Settlement'. These are settlements that have some of the services and facilities to meet the day to day needs of the residents. Unfortunately, we do not have such services – no shops and few businesses, just a pub, garden centre and a primary school (which is oversubscribed). We should be classed as a 'Small Village or Hamlet' – A settlement that has limited services and facilities to meet the day to day needs of the residents. It would appear the potential proposed number of houses compared to the size of the existing village is much too high. The proposal for an additional 115 houses represents almost two-thirds of the size of the existing village. Taking into account the issues we already have with flooding, traffic flow and speeding, the additional traffic flows would cause severe additional problems. We do not have the road infrastructure or the ability to create an acceptable infrastructure, to cope with any additional traffic, w	requirements and be approved by the Highway Authority. The impact on heritage and the conservation area is known. The implication was recorded in the SHELAA and SA assessments. This response will inform further site assessment work, and the next draft of the local plan. Impacts of development on landscape, green space, and biodiversity have been considered as part of the site assessments. Any future proposals will be assessed, and any impacts would be mitigated appropriately.
EDCLP/105 William and Susan Wreglesworth	Having attended the meeting in Cossington village hall on the 20th November we would like to make a few points regarding the draft plan for Cossington. We have recently suffered the worst flooding we've seen in the 50 years we have lived in the village. Much of the water came from the stream next to Derries garden centre and the proposed building site. Any new building can only exacerbate the situation, bringing more misery and people forced from their homes.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	There is then the problem of schooling. The village school is full	A transport assessment has been undertaken to assess the impact of

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	and has no room for more children. Main Street is already clogged up with cars at school times and this can only get worse. Sileby's doctors surgeries are overflowing even before the proposed new building there. Syston surgery can only accessed by	growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	car (if the walk down Platts Lane to a bus stop is too much) and they are already taking on East Goscote's patients as no doctor can be found to run a surgery there. Access will be via Back Lane and Bennett's Lane. Have you tried driving there?	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	Both lanes are mostly one car width. There are no pavements so pedestrians are forced to walk in the road, neither is there any space to widen the lanes.	
	We are amazed that you can even contemplate adding yet more houses, cars and people to the village.	
EDCLP/109 Malcolm Kitching	I would like to comment on your Draft Local Plan 2019-2036 as it will affect COSSINGTON First I would like to say that at a meeting a few years ago (possible a conservation area meeting) we were informed that Cossington	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	along with a few other villages would be ring fenced from development in order to preserve their rural village status. During November we received from our Parish Council a letter regarding the draft plan with the following bullet points taken from a report written by Charnwood borough Council.	The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions approximately 800 additional dwellings to 'Other Settlements') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	 There is plenty of Room in Cossington School A Cossington resident new to the village was unable to get there child into Cossington School ! 2. There are plenty of places at the Doctors The nearest Doctors are Sileby and Syston. There are two doctors 	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	Surgeries in Sileby trying to cope with all the extra house building going on in Sileby with another 1000 houses proposed. Syston I understand has closed its books to people living outside of Syston. 3. The residents of the houses will bring wealth and spending power into the community.	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	 There is one Public House and no shops in Cossington. Where will they spend their money, I see no shops in your proposal ? 4. Cossington does not have a flooding issue During the recent heavy rainstorms Main Street was flooded from Bennetts Lane to Derry's Nurseries a number of properties being 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	flooded and now needing extensive repairs! This despite Severn Trent spending a number of months in the village putting large underground holding tanks in the field at the side of the church.	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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	Cossington is attacked from 2 sides the River Soar to the West and from the water coming off the fields to the East. A number of fields on the Eastern side of the village still have large pools of standing water. At the main street Syston road junction there is still constant stream of water coming out of the field. 5. Access from the Larger site (70 houses) will exit on to Humble Lane As a resident of Back Lane I am very concerned at the potential 140 plus cars using Back Lane and Bennetts lane to access the Main Street. Both of these lanes are very narrow in places and even 2 small cars are unable to pass. Neither of these lanes have pedestrian footpaths. These small lanes are already used by parents going to Ratcliffe college. I have already raised concerns with Councillor Poland about my concerns of increased traffic from the proposed Peas Hill Farm estate at the top of Ratcliffe Road Sileby. What safeguards will be put in place to keep people safe on these 2 Lanes ? 6. Land North of Syston Road / West of Main Street 54 Houses This site is on the corner of the village. There have already been a number of serious accidents at the junction of Main Street and Syston Road. The plan does not show where the access to the site will be, but in any case whichever road access is on there will be to potentially dangerous Junctions close together If either of these sites go ahead it will spoil what is a pleasant rural village	The impact on heritage and the conservation area is known. The implication was recorded in the SHELAA and SA assessments. This response will inform further site assessment work, and the next draft of the local plan. Impacts of development on landscape, green space, and biodiversity have been considered as part of the site assessments. Any future proposals will be assessed, and any impacts would be mitigated appropriately.
EDCLP/111 John de Caestecker	I have lived in Cossington [redacted] and would like to make some comments about parts of the local plan to 2036, in particular the proposal to build 70 homes (HS66) between Humble Lane and the corner of Main Street where Derry's nursery is situated. I don't have a fundamental problem with additional housing but am concerned about the effects this may have and do not feel these have been sufficiently explored in the draft plan. I am particularly concerned about the increased flood risk (surface water) which caused flooding [redacted] in a flash flood on 1st October 2019. The fields behind Derry's nursery were completely waterlogged form weeks of steady rain and were no longer able to absorb the torrential rain that had occurred the previous night and that morning, overwhelming Derry's brook and overflowing onto Main Street. This also happened before we moved to Cossington (I think in 1999) but this does not feature in your flood assessment which states that there is no flood risk for the village. The proposed development will reduce the area available to absorb	 The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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	rainwater making future flash floods from surface water more likely - especially with the increasing annual rainfall (with climate warming) that the UK has experienced over the past 5 years or so. I do object strongly if no additional measures are adopted to reduce the risk of similar floods in the future – [redacted] I am also concerned about the road access - Humble Lane is accessed from Main Street by very narrow roads (Back Lane and Bennett's Lane) which are too narrow to allow 2 cars abreast. How will the extra traffic be accommodated - these 2 lanes cannot be widened due to the properties on either side? The plan seems to state that any additional schooling can be accommodated in Cossington Primary school (which already had large class sizes [redacted] within the last 10 years), so I do not agree with this unless the school is expanded. [redacted] I know that the 2 GP practices in Sileby are already over-subscribed, as are the 2 Syston practices so I am not sure where the capacity for extra patients is (especially considering the large housing developments that have just occurred and are further planned for Sileby). I would be grateful if these comments could be considered.	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
EDCLP/116 Christine Gerrard	 I am writing to comment on the supporting document referring to future development of Cossington in the Charnwood Local Plan 2019-2036. The supporting document states: 1. There is plenty of room in Cossington School. Clearly a false statement as the school is unable to accommodate children recently come to live in the village as it is full. 2. There are plenty of spaces at the doctors surgery. Cossington does not have a doctors surgery. The closest surgeries are Sileby, which is under pressure due to the continued expansion to the village, and Syston which is also under pressure due to additional patients registering from the recently closed East Goscote surgery. 3. The residents of the housing will bring wealth & spending power into the community. Apart from a pub, a church and school Cossington has no facilities for people to spend there supposed wealth on. 4. Cossington does not have flooding. Clearly another false statement. October 2019 saw the worst flooding in Cossington ever known. The floods were reported by local and national newspapers and regional TV cameras. Bennett's Lane to Derry's nurseries was closed, giving no access to 	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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	REPRESENTATION SUMMARY Homestead Close. The school had to be evacuated and residents on Main Street taken from their homes in boats. Need I say more about flooding in Cossington and the surrounding area. 5. Access to the proposed housing from Humble Lane. Site 1 [HS66] If development of this site was to go ahead then great consideration must me given for alternative access. From Cossington, access to Humble Lane is either via Bennett's Lane or Back Lane. Width of both of these roads are for single vehicles, with no footpath, passing places or capacity to widen. Bennett's Lane currently gives access to Fisher Close, Back Lane gives access to the pub car park and Middlefield Road. Both roads are already well used and great care has to be taken by pedestrians and vehicles alike when using these small road. Neither would tolerate the additional vehicles that the proposed 70 new houses would generate. Hoping my comments are of value to you and will be taken into consideration when the proposed plan passes onto the next stage. I am very strongly opposed to more houses in Cossington for the	OFFICER RESPONSE
EDCLP/117 Linda Castleman	 am very strongly opposed to more houses in Cossington for the following reasons Cossington is a conservation village and the character of the village would be ruined by this development. The new houses which are very large in number compared to the small current linear village would swamp the look of the currently charming village. There are so few of these old worldly villages left and I feel these should be preserved Other developments in Rothley and Sileby for example, blend well with the surroundings We have recently had very bad floods and surely a village prone to flooding is a bad location I am concerned about the increase in traffic - the roads just can't take it. Again, if the roads were changed, the character of the village would be devastated I fear the infrastructure is not large enough e.g schools, doctors. We do not have even one shop in Cossington and no social facilities. If these were added, again the character of village would suffer Traffic is a big worry - we live on Main Street [redacted]. Years ago we could have driven out of our gate on to Main Street virtually blindfold as very little through traffic. Now with Sileby/Rothley developments it is at its peak, so very busy and cannot take any more traffic 	 The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. The impact on heritage and the conservation area is known. The implication was recorded in the SHELAA and SA assessments. This response will inform further site assessment work, and the next draft of the local plan. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical
	6 I fully appreciate that more houses are necessary. I assure you	local plan. Any access arrangements would need to satisfy technical

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	that this is not a "not in my back yard reaction". But there are so many areas where houses could be better placed. You are not short of sites and Cossington is a very bad location and poor choice	requirements and be approved by the Highway Authority.
EDCLP/118 WDA Planning	 The site identified on the attached plan is the subject of a live planning application - ref P/19/0813/2 which proposes the erection of a single dwelling with a biodiversity garden. The proposal has been considered by the Plans Committee (August 2019) which has indicated it could take a positive position on the matter subject to the resolution of a limited number of matters. The Committee resolved. The application proposal is the subject of a full consultation response from the CBC Conservation and Design Team - as attached. The Team gives a full reasoned assessment. At the same time, the draft Local Plan has identified Cossington - an Other Settlement - as a sustainable location for significant new housing provision. The Local Plan's Development Strategy includes 800 dwellings across the 12 Other Settlements. Should Site HS65 continue to be supported by the Borough Council as the Local Plan proceeds, the northern boundary of the site which abuts the application site should be extended to Platts Lane - there are no environmental and/or technical reasons not to do so. 	Noted – the process for planning application (19/0813/2) is not affected by the overall progress of the draft local plan. The proposed allocation at HS65 is based upon an analysis of the site- based information held within the SHELAA (Reference: PSH393).
EDCLP/119 Wendy Bates	As a resident of Back Lane. Cossington [redacted] I feel I need to voice my concern for the proposed plans for housing in Cossington, particularly the plot off Humble Lane. The proposed access road for this plot would take over 100 cars a day out onto a single track road with no passing places. Most of the traffic would use Back Lane or Bennett's Lane. Neither of these roads have pavements for pedestrians. Vehicles currently use Back Lane as a cut through to A46 & Ratcliffe College. Vehicles do not comply to the speed limit even though it is single track Lane with a blind bend. On the blind bend is a gate which is only access point for residents of Middlefield to walk their children to school. Elderly or disabled residents, who are not so quick to cross the road, have had several very near misses with cars & commercial vehicles speeding & not aware of pedestrians. Back Lane also regularly has horse riders & cyclists using it. As there are no passing places cars & commercial vehicles constantly use our driveways to pull up onto. This is causing damage to our drives, and forcing residents to undertake expensive	 The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the

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	 repairs & actions. Once these driveways are all blocked there will undoubtedly be collisions as often cars shoot up our drives at speed to avoid other vehicles. Even if Back Lane was made one way & the traffic from the proposed new estate was only able to enter & exit via Humble Lane this is also a narrow road with a sharp bend & cars on wrong side of road just over railway bridge. An increase in traffic would increase accidents. Again there is limited or no pavements for pedestrians, dog walkers or safe space for cyclists & horse riders. The plans show Cossington as not having an issue with flooding, however several house have been flooded this year so severely they will be unoccupied for up to a year. Syston Road at Cossington Mill/Rothley floods several times every year. This brings more traffic through Cossington Village. The neighbouring village has no amenities to serve a larger population. There is no GP surgery, or shops. The School does not have places in each class & Cossington children are not guaranteed a place. Other local village schools are having to accommodate new housing estates in their Villages, so no places for new Cossington families. Another 115 properties in Cossington would increase the size of the village by two thirds. The infrastructure of drainage, road suitability, flood defences would not support this increase of dwellings. 	local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
EDCLP/120 Pauline & Tony	I wish to submit comments in response to the above which gives justifications as to why Cossington is deemed suitable for future	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site
James	 growth and that there would even be benefits for the community. 1. There is plenty of room in Cossington School There are plenty of spaces at the Doctors. I understand that the school is already oversubscribed. There are no GPs in Cossington and two medical practices in Sileby serve both Sileby and Cossington. Taking into account that the total growth being considered is 1120 houses in total in these two areas, I assume these potential problems have been considered. 2. The new houses will bring wealth and spending power in to the community At first glance it would appear that only the Royal Oak pub would benefit. 3. Cossington does not have a flooding issue. 	 assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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	Two months ago Cossington was flooded between Derry's	
	Nursery and Bennets Lane,	Access arrangements will be finalised as part of the next stage of the
	and several Houses have had to be evacuated for up to 18 months as a result. The	local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
	Cossington Main Street/Syston Road junction as well as the	requirements and be approved by the highway Autholity.
	usual Syston Road flooding	
	area near the layby up to the river was flooded. Cossington was	
	impassable via Syston	
	Road and Main Street. In Sileby, Mountsorrel High Street and	
	under the A46 on Ratcliffe Road have also been affected by flooding. Inevitably	
	this has lead to concern	
	about future flooding if 120 houses are built on arable land in the	
	village	
	4. Access is going to be from Humble Lane	
	Back Lane/Humble Lane is narrow and winding with little lighting	
	and no footpaths.	
	The extra traffic along here is very worrying. In addition any flooding in Cossington and	
	the consequential diversion of traffic leads to excessive tailbacks	
	and disruption to traffic.	
	An example of this is that during the recent flooding, traffic going	
	from Cossington	
	towards Loughborough was diverted through Barrow on Soar	
	causing roads leading into	
	Barrow to be gridlocked. Additional traffic will only exacerbate this problem.	
	I hope you will give serious consideration to these concerns.	
EDCLP/123	I feel very strongly against more houses in Cossington as it would	The impacts of new development, and the implications for infrastructure
Stephen	increase the village population by possibly well over 50%, with no	capacity, have been considered as part of the IDP and individual site
Castleman	potential for infrastructure improvements. The roads in the vicinity	assessment work.
	at present are very fast and others through the village and	
	immediate surrounds are narrow and seriously abused by speeding	Flood risk is an important issue and the site selection process has been
	drivers. Increasing traffic flow would be catastrophically dangerous. There are no social facilities in the village except the pub. The	informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	current village hall is due for demolition shortly being riddled with	evidence will be prepared as the drait local plan progresses.
	asbestos (based within the confines of the school). The school	A transport assessment has been undertaken to assess the impact of
	itself had a brand new building relatively recently but is totally full	growth on the roads in Charnwood. Further transport modelling will be
	with many existing village families not gaining places. The school is	undertaken as the plan progresses to refine the package of mitigation
	a Church of England school with very strong Christian ethics which	measures required to manage the impact of growth.
	I can't imagine suiting everyone. It is positioned on a very	
	dangerous bend with no car park, and the cars of parents on drop	The Council is preparing a Sustainable Transport Study, this response

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	off and pick up already cause a serious hazard. Flooding is a major issue as witnessed recently with many homes having to be vacated for up to a year and rescue dinghies at work on the Main Street. Cossington floods even hit national news channels! I would suggest that the flood risk assessment is seriously flawed or out of date. Cossington has hugely benefitted from the amazing Meadows facility, river / canal walks and the designated cycle routes. This attracts many cyclists and walkers to the area where some of the houses are planned. Therefore, the proposed houses off Syston Road would ruin this environment and endanger the bio diversity of the area which ironically is promoted within the Meadows scheme, not forgetting exacerbating the traffic problem referred to earlier.	 will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
EDCLP/133 Mr and Mrs S Pearson	I would like my comments to be taken into consideration with regard to the two proposed development sites. The scale of the proposed developments would increase the village by almost a fifth - this size of development would irreparably damage the small village, made up of established dwellings. The character of this unique village would be destroyed. A large part of the village is a conservation area and backs onto a large nature reserve, providing habitat for newts, bats, birds of prey and owls amongst other things. There is not an infrastructure to support this additional population; the small primary school is already over subscribed; there is one pub and no shops or businesses. The village is mainly served by single track roads, which do not provide cars to pass. It would be unacceptable and dangerous to introduce large amounts of additional traffic (including building infrastructure vehicles). The road between Sileby and Cossington is exceptionally busy at peak movement times already; and at school times parents already park inconsiderately over peoples drives on main roads, sometimes making it impossible and dangerous to cross Main Street of to try to access Main Street from driveways. I attached a photograph of a farm vehicle on humble lane (you will see that there is no space to pass). The main exit route is therefore Syston road. This has been impassable due to flooding a number of times this year already. This leads to additional volume of traffic being forced through Sileby and barrow. There are already large scale developments in Sileby, barrow and Rothley and we suggest that further development be concentrated here and Loughborough and Leicester - where infrastructure exists and there is not a concern	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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	over character being damaged via further development. There has been extensive flooding in the village this year. At least six families on Main Street have been forced to move out for almost a year. The nature reserve and fields are still sodden and additional building would increase this risk further, they already have populations of a number of thousands; which is incomparable to Cossington's circa 600 population. We object to these proposals in the strongest terms to any development of the village, as described above.	
EDCLP/134 RCA Regeneration Limited on behalf of Mr and Mrs Gamble	 This is a submission on behalf of Mr and Mrs Gamble in respect of their land at Main Street, Cossington. We support the proposed allocation of the site (DCLP Ref HS65) for around 54 dwellings. Discussions are now being held with a housebuilder, and technical evidence covering ecology, topography, trees, drainage, landscape and visual impact, transport and highways and heritage are underway. These documents will be submitted to the Council's policy team once available for your consideration prior to the plan being submitted for examination. We urge the Council to revise the village settlement boundary to include the site within it, in due course. We note the need to consider the historic character and appearance of the village in terms of the design of a future scheme, at para 5.10 of the Reasoned Justification of Policy LP3. We are broadly supportive of the process that has informed the strategy and SA for the DCLP. As already stated, we are supportive of policy LP3 where it allocates land at Main Street, Cossington and we support the 	Noted – support is welcomed. The Council would welcome the opportunity to review and respond to the technical evidence being prepared for the development site, so that this information can be used to inform considerations of deliverability and developability.
EDCLP/262 Andrew Gerrard	quantum of development proposed.Below are my comments regarding Cossington and the plan.The supporting documents state that:'There is plenty of room in Cossington School'.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	 This is not the case as a new family to the village have not been able to send their children to the school as it is full. 'There are planty of spaces at the dectors' 	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	 'There are plenty of spaces at the doctors'. The village does not have a surgery and most residents either attend Sileby or Syston surgeries. Both of these villages are experiencing great growth and that is bringing 	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation

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	pressure on those surgeries.	measures required to manage the impact of growth.
	 'New residents will bring wealth and spending power to the community'. Other the pub and a church, there is no where to spend that so called wealth. 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	'Cossington does not have a flooding issue'. This so wrong, the village has recently had major flooding all along Main St with some residents having to be evacuated by the fire services. The flooding seemed to originate from the stream and fields at the side of Derry's and not the from the river. This where Site 1 is proposed for development. Flooding is a MAJOR issue and this need to be very carefully considered.	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
	 'Site 1 access is to be from Humble Lane' [HS66] The roads leading up to Humble Lane (Bennetts Lane and Back Lane) from the village are basically single lane and cannot cope with two way traffic flow now. The verges are often damaged by traffic squeezing past and it is not safe for pedestrians now and a greatly increased traffic flow will make it even more dangerous. There are no footpaths on either of these lanes nor is there a capacity to install them. Serious consideration must be given to an alternative access if this option is to go ahead. 	
EDCLP/214 Kirstie Ling	It has come to my attention that plans have been proposed for 2 building developments within Cossington. I would like to formally object to this proposal.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	The school is very small and will not have space for the influx of children that the new developments will bring. The suggested use of Humble lane, Bennets Lane and Back lane for access is totally unsuitable. Humble lane is un-lit, twisty and	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	narrow. Both Back Lane and Bennets Lane are single carriage ways. The roads are difficult to navigate if traffic comes head to head and if anyone has a delivery the whole road is blocked. Extra traffic pressure on these narrow lanes would be treacherous! As the communities stands at the moment, Doctors are overcrowded	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	and with all of the new building developments in Sileby, we will see people turned away from their local surgeries as well as schools. Cossington has no real amenities and will in no way benefit from 637	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.

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	being doubled in size.	
EDCLP/218 Emma Holyoak	The housing development suggested for Cossington is massively disproportionate in relation to the size of the village and the shape of the village. Taking landscaping steps to try to mitigate this would not alter the footprint now no longer being linear.	Impacts of development on landscape, green space, and biodiversity have been considered as part of the site assessments. Any future proposals will be assessed, and any impacts would be mitigated appropriately.
	In specific relation to the sites; they suffer from poor access and, in relation the land next to Derry's (HS66) there is only a single track road in relation to infrastructure. HS65 is laughably disjointed from the village and would almost feel like it's own settlement.	Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
EDCLP/240 Tim Coleby Stantec obo	We do not consider that the Draft Plan demonstrates that this site is suitable for housing development, as is required by paragraph 67 of the NPPF, for the following reasons:	Noted – the proposed allocation at HS66 is based upon a series of evidence-base documents prepared by the Council.
Barwood Development Securities Ltd (Sileby)	 Cossington is a very small settlement with very few services or facilities, making it unsuitable and unsustainable as a location for housing development of this scale; and The site comprises about half of an agricultural field and its eastern boundary is entirely open and undefined by any landscape or man-made feature; 	This response will inform the further site assessment work which will take place before the next draft of the local plan is produced.
EDCLP/193 Richard Webb	I do not believe the sites in Cossington have been selected according to many of the processes that have been outlined. The appraisal notes that the access to facilities and services "was not ideal but reflects the place in the hierarchy" This is fundamentally flawed in two regards.	The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions approximately 800 additional dwellings to 'Other Settlements') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	 The hierarchy is not up to date or accurate and so predicating decisions based upon this is dangerous and wrong. Not ideal is a rather larger understatement in so much as 	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	that there are NO facilities and services that cannot be reached without access or provision of motor traffic.	Impacts of development on landscape, green space, and biodiversity have been considered as part of the site assessments. Any future proposals will be assessed, and any impacts would be mitigated
	Cossington is a small village but the sites and number of houses proposed does not reflect this. The scale is recognised in the appraisal document (7.2.38) being stated as "relatively large in the	appropriately. A transport assessment has been undertaken to assess the impact of
	context of the settlement". The appraisal then seeks to mitigate this in relation to screening and landscaping to mitigate this from a visual perspective but screening a part of a village off in this way	growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth.
	would surely make the site less part of the village. The flood data for Cossington is in need of revision. This year the 638	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport

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	entire village was flooded (including the primary school). As the road was closed it also pushed the traffic network surrounding Cossington to breaking point. The increase in hard runoffs will be a negative impact rather than the "neutral" outlined in the report.	measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	Cossington is recognised as being "linear" in nature by a number of areas of the report (including 7.9.33) Even with a reduced developmental density of 18dpa and 54 dwellings for HS66 the village will grow by a significant percentage away from this linear nature. A fundamental change in shape and structure of this small village should not be regarded as "neutral"	
	The appraisal document 7.11.28 recognises that access to the service centre of Sileby would not be through walking or cycling but does not recognise that there will be any pressure of note on local facilities. This is despite the fact that their will be an increase in traffic and population. 7.11.29 calls out a number of significant problems in regard to the provision of recreational facilities but classifies this as "neutral" rather than negative. The reasoning in this paragraph seems to be that healthy living is not being promoted. This statement is plain wrong. Healthy living is being promoted nationally and Cossington's sites should not be given a "neutral" impact status in this regard when there are no facilities available. It is a negative effect.	
EDCLP/232 C.McLeod	I am writing with regard to the Charnwood Draft Local Plan for Cossington and my concerns with the scale of the proposed new housing development(s). Surely Cossington is a Small Village rather than an 'Other Settlement'? We have no shops and no doctor. We have only a Garden Centre, Pub, and small Primary School which which is at	The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions approximately 800 additional dwellings to 'Other Settlements') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	present unable to accommodate all the children from the village. Adding 100 plus new homes (over half the size again of the current village) would put an impossible burden on Cossington and the few facilities it has has to offer.	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	Separately, and remarkably, the plan says we do not have a flooding problem in Cossington. This year, the terrible floods that made national TV news resulted in many residents being made	Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses.
	homeless. Apart from this particular incident, having lived in Cossington for 7 years, I know that roads in and around the village	A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be

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	are regularly flooded (and therefore closed), making access difficult. With regard to access, If this is to be from the often single- track Humble Lane this would create a safety issue for pedestrians of all ages who use these back streets on a regular basis.	undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response
	Taking the above into account, I feel that the proposed number of houses is unacceptable.	will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
EDCLP/181 Ivan Colbourne	 I STRONGLY BELIEVE THE PERSON WHO DID THE RESERCH TO THE PLAN DID IT A LONG LONG WHILE AGO. A lot of information given is out of date. The school is full up new residents to the village cannot get their children in. let alone you building housing estates with a further amount of children. PARKING AROUND THE SCHOOL IS ALREADY A REAL HAZZARD. The school has been there for years when and still is a tiny village school. Do you intend to build a new modern school .a lot of children in the school come from sileby .do you intend to cancel this arrangement and put only Cossington children allowed. On bennetts lane You do not have adequate footpaths to safeguard the children or parents. Well on flooding will new residents be able to get insured or if so at what cost. Derries flooded very bad recently and you intend to put houses near there. The size of the roads is also a concern on bennetts and back lane cars already churn up the grass verges. FOOTPATHS ARE LIMITED . Potholes are a regular feature. Humble hill and and back lane are used regularly by cyclists walkers horse riders. Large farm vehicles come down Back lane and block and delay traffic. The Cossington road to Sileby is very congested with cars 	 demand, cost, timescale, and delivery. The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. Further discussions are taking place with LCC to explore the specific issue of school capacity at Cossington. This information will inform further site assessment work, and the next stage of the draft local plan. Flood risk is an important issue and the site selection process has been informed by a Strategic Flood Risk Assessment. Further flood risk evidence will be prepared as the draft local plan progresses. A transport assessment has been undertaken to assess the impact of growth on the roads in Charnwood. Further transport modelling will be undertaken as the plan progresses to refine the package of mitigation measures required to manage the impact of growth. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. Access arrangements will be finalised as part of the next stage of the local plan. Any access arrangements would need to satisfy technical requirements and be approved by the Highway Authority.
	parked on both sides of the road. I would like you to view these comments as my concern for safety	
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	is that it should come first.	
DCLP-264 LCC - Education	 Primary (Cossington CofE Primary): "• A small school of 105 pupils on constrained site in conservation area unable to expand. • Maybe challenging to accommodate pupils due to other local schools having to cater for their own housing demands unless there is potential for developing a new school to replace the existing." 	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. The Council would welcome a discussion with LCC on education infrastructure, and to understand the issues and potential mitigation in more detail.
	 Secondary (Humphrey Perkins): Cumulative effect of developments in Cossington, Barrow and Sileby would require an additional 90 places further expansion would need to be discussed with Academy sponsor. 	
DCLP/261 Edward Argar MP	Similar objections exist to proposals for 124 in Cossington (HS65/66) [it would further eat away at the areas of separation between villages in the area, undermining their particular individual character, and running counter to other proposed policies in the Local Plan to protect the character of villages/ towns and maintain separation between settlements]. In each of these cases the scale of the proposed development would, I believe, risk significantly altering the character of the existing village of itself, as well as running the risk of eroding the separation and separate unique identities of the village. This is	 Draft Policy LP3 is clear that housing developments will be supported where they are carefully planned to avoid and then mitigate significant adverse effects onthe separate character of settlements Furthermore, Draft Policy LP19 seeks to protect the Areas of Local Separation. Indeed, the Area of Local Separation between Sileby & Cossington (ALS 4) is maintained. The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work.
	quite apart from broader concerns about the impact of additional pressures on local infrastructure arising from development of such a scale. While I believe overall in its thrust the Plan is a sound basis for future planning, I strongly believe that the above proposals are not the most appropriate way to proceed.	
EDCLP/252 Leicestershire County Council	Land west of Main Street and north of Syston Road, Cossington (54 dwellings) Land rear of Derry's Garden Centre, Cossington (70 dwellings): The sites are likely to present challenges in terms of walking, cycling and public transport connectivity. This will need to be reflected / considered in any transport assessment work. The land to the rear of Derry's Garden Centre does not abut adopted highway	The impacts of new development, and the implications for infrastructure capacity, have been considered as part of the IDP and individual site assessment work. The Council would welcome a discussion with LCC on sustainable transport infrastructure, and to understand the issues and potential mitigation in more detail. The Council is working with LCC to prepare the Sustainable Transport Study, which will identify potential transport mitigation measures.
EDCLP/192	Capacity improvements have very recently been completed within	Noted – the information on capacity improvements is helpful.

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Severn Trent Water	Cossington. We will need to ensure that we have all the details of the scheme from our Capital Delivery and Commercial team incorporated into another review of the site proposals. It would be useful to understand the likelihood and timescales from development at this location.	A housing trajectory setting out when sites are expected to be delivered will be produced as part of the next draft of the local plan.
Q8 - LP3 - Housir Specific Sites – H	ng Sites IS67 HS73 (East Goscote/Rearsby)	
	lelton Road, East Goscote	
DCLP/8 Mr Corey Taylor	I can only really comment on HS67 above, i.e. the land off Melton Road, East Goscote when I comment in regards to the draft plan, but hopefully the reasons for my objection to this element of the plan doesn't mean that the plan is completely flawed across the board! I live in a home that backs on to this proposed site, which Gladman Land tried unsuccessfully to gain council approval for, for over 200 houses. During their repeated attempts to get this approval, the local populace voiced the countless reasons against this proposed development, and rather strangely, considering I am currently commenting on a Charnwood Borough Council document that appears to be advocating the building of 223 houses, Charnwood Borough Council were also dead against the plan! Even going so far as to pay for legal representation and fully support the local residents in their objections when Gladman Land appealed to the secretary of state to try to get their mercenary development plan approved, which they were thankfully unsuccessful in doing. So how on earth can the very same council, who were completely against the plan to build on this land only a few months ago and completely agreed with the residents in regards the reasoning why this proposed development was completely unsustainable and out of keeping for the area, have now included pretty much the same development within their draft plan?? One of the reasons for the refusal for Gladman Land to build on the site detailed in HS67 was the increased risk of local and down stream flooding,. This risk is even more evident at the moment whilst the whole area is gripped by widespread flooding. Considers that development of Site HS67 would require multi million pound investment in infrastructure to make sustainable. I cannot tell you where you can find space for 223 houses in the local area, but even if I could, the reasons the development was refused planning permission were countless, this type and size of development in this area is just not sustainable.	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation. This site has been assessed in the SHLAA, and through the SA. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application, and the subsequent decision at appeal.

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DCLP/166 Mr David Hewitt DCLP/264 Mrs Victoria Needham	 Reference HS67 East Goscote 223 dwellings. This is part of an application that was previously refused for good reasons. With 223 houses and an average of 2 cars per house would mean around 1000 car movements per day. This will cause major traffic problems on the Rearsby to Goscote road. The Rearsby bypass was built to divert traffic out of the villages. You are now proposing to put it back. The access will be encroaching into the Rearsby - Goscote separation. There is no cycle lane between Rearsby and Goscote. There are already accidents with cyclists on the road, further traffic will cause more injury. Cars are already using the Goscote - Rearsby road rather than the bypass. This programme would make matters even worse HS67 - 225 houses inland off Melton Road, East Goscote The services of East Goscote are not adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children, the doctors surgery has closed, the local shopping area is too small, the traffic at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. Flood Risk Zone 2 appears to just touch the southern site boundary nearest to Gaddesby Brook. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and curnulative assessment). This response will help inform that
DCLP/265 Mrs Lynn Morgan	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a 	work. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where
	low projection of 100 extra children; the doctor's surgery has	education infrastructure is required this will be delivered by LCC.

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	 closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
DCLP/279 Dr Roy Loveday	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of 	 A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood

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	•	local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough.	 zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and
DCLP/297	C	oncerns that:	considered as the local plan progresses to the next stage. The impact of the development in terms of infrastructure requirements
Mr Tony Carter	•	The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where	 has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
	•	multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional

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	would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough.	dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
		A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
DCLP/331 and DCLP/332 David Keay	HS67 – 225 houses inland off Melton Road, East Goscote. 1 This is part of an application that was previously refused for good reasons. The proposal of 225 houses in this parcel of land is	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has	The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.
	closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. You are now proposing to put it back. 2 There is no cycle lane between Goscote and Rearsby, with the additional traffic this would be a danger. Cars are already using the	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	Goscote - Rearsby road rather than the bypass. This programme would make matters even worse 3 The land is low lying and in part prone to flooding. Recent	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	 experience shows that situation is likely to increase with climate change. 4 Another vital reasoning for the objection of the previous planning permissions is that of the positioning of the development will create a blurred visual boundary between the two villages of East Goscote 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	and Rearsby, harming the purpose, integrity and landscape character of the 'Area of Local Separation' (ALS). The two villages do not desire to be adjoining; the local communities value their separate identities and are concerned that the proposed development will lead to coalescence of the two settlements.	The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
DCLP/343 Mrs Jane Baker	HS73 & HS67 Instead of proposing further extension of the Leicester urban area along the Melton Rd corridor, separated only by minimal cosmetic green areas, a more far sighted plan needs to be developed. The blank six hills area is ideally suited, by its situation and location on the A46. the development of a new town here would take the pressure off the corridors northwards out of Leicester.	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
DCLP/383 Mr Kevin Preston	 HS67 – 223 houses inland off Melton Road, East Goscote East Goscote currently has approx. 1000 dwellings. It also has a small area of separation between itself and the neighbouring village of Rearsby. 	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.

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	 Two applications to build a similar number of properties on this site have been made recently; both were refused. (One decision was appealed but the decision to refuse was upheld). The proposal cannot be considered 'small' and would represent a very significant increase in the scale of the village, by adding 223 dwellings to a village of limited services. This increase would be detrimental to the health and well-being of existing residents by contributing to an unsustainable pattern of development. The proposal also sits outside the settlement boundary, making the small area of separation between East Goscote and Rearsby even smaller. It was stated by Charnwood Borough Council when refusing the two recent planning applications, that the impact upon landscape and countryside would be unacceptable. There is no reason to believe this has changed. Finally, I cannot understand how Charnwood Borough Council, having rejected development upon this site twice and having fought an appeal against that rejection, should now consider it to be suitable for development. Charnwood Borough Council built a compelling case as to why this site should not be developed and successfully won an appeal as recently as six months ago. It makes no sense that it should now consider the site suitable. 	 This site has been assessed in the SHLAA, and through the SA. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application, and the subsequent decision at appeal. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP.
DCLP/387 Mr Norman Corner DCLP/416	HS67 The proposal is out of proportion to the available local services, and risks changing substantially the character and quality of life of East Goscote and Rearsby. HS73 and HS67 Again, the proposals are inconsistent with appropriate scale of development in the villages, and also with the objective of retaining separation and the character of the villages. HS67 - 225 Houses - Melton Road - East Goscote.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with
Mrs Claire H	A previous planning application has already been refused, and for good reason. A substantial increase of traffic to the area would create a potential danger to pedestrians, as well contribute towards air pollution. Controlling the speed of traffic would mean further construction of ramps, crossings and/or cameras using up more local resources and ultimately costing more money to manage. There has previously been a similar problem on this stretch of road and it became necessary to construct a bypass to aid the volume and speed of the traffic.	 new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport

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	There will be a detrimental effect on wildlife and there are not enough resources in the village to cope with the increased demand, plus the doctors surgery has also recently closed. 225 additional homes is not sustainable and would add too much pressure to what is currently a successful, thriving community.	 measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.
DCLP/418 Mr Ashley Hollis	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and
DCLP/420 Mr Neil Lewin	I wish to object to the planned building of additional houses between East Goscote and Rearsby. There was a significant amount of evidence raised in objection to this plan on its initial	considered as the local plan progresses to the next stage. The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.

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	 hearing. Nothing has changed with regards to the proposed site and the many issues raised at the time. At the initial hearing the planned development by Gladmans was thrown out and yet it has reappeared in the Councils plans for the future. This is a ridiculous waste of energy and effort by all parties, a decision was made based on solid evidence and overturned with no further arguments put forward to change the case. What is happening to democracy in this Country? There is a great deal of suspicion arising from this rapid turn around in decision making by Charnwood Borough Council. 	This site has been assessed in the SHLAA, and through the SA.
DCLP/421 Mr Steven Lehner	 Concerns that: 270 new homes proposed across Rearsby and East Goscote is an excessive burden to place on these two small villages. Neither village has the facilities nor the school spaces to support these additional homes. This is particularly the case for Rearsby, where the school site has no feasible space for expansion of the building without significant loss of learning environment and a consequent deterioration of educational provision. It is also disproportionate when viewed comparatively across the plan, as no extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough. However, multiple small scale infill projects in these villages could cumulatively achieve the required government targets, whilst having limited impact on individual communities or causing unsustainable strain on local services. Instead of proposing further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan is required. The area of Six Hills is ideally suited, by virtue of its location close to the A46, for the development of a new town that would take the pressure off the corridors northwards out of Leicester and Loughborough. 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

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DCLP/424 Mr Mark Durrance	 HS67 – 223 houses inland off Melton Road, East Goscote. 1 The proposal of 223 houses on this area of land is excessive. The services of East Goscote will not be adequate for the purpose: The school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed and has transferred the services to the Syston Medical centre Traffic flow towards the main commuter routes would increase an already congested route at the A607 roundabout or through inappropriate alternative routes to the A46 i.e. single track or residential areas Without detailed plans of the proposed exit points it is hard to ascertain, however I'm assuming the exit point will be through a single point on the Melton road at East Goscote. This in itself will create a high degree of congestion throughout the day and, in particular, during commuter hours even based on a conservative estimate of 1.5 vehicles per household this equates to an additional 334 vehicles into an area with limited clear routes to the major commuter trunks 2 Part of the objections raised regarding the Gladmans proposal on the same site indicated that the rain run off would push more surface water through into the Gaddesby brook, this is turn would increase an already well known flooding area along the base of Broome lane and further along the Wreake valley to other areas susceptible to flooding I'm pleased to see that the previously raised concerns of local residents in regards to the Areas of Local separation has been taken notice of and also the volume previously proposed by Gladmans, however an increase of this size still seems excessive 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
	and out of proportion with the current size of the surrounding villages of East Goscote and Rearsby	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application, and the subsequent decision at appeal.
LDCLP/27 Mr R Gordon- Smith	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with
	650	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	 new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
LDCLP/28	Concerns that:	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The impact of the development in terms of infrastructure requirements
Mrs P A Gordon- Smith	 The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Poarsby and East 	has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. 	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that

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 It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
I am writing with regard to the proposed plan to build another 223 houses in the village of East Goscote. I do not feel that East Goscote is able to support any more houses. The village is a pleasant place to live and I feel very strongly that any further housing would result in over- development which would stretch the current amenities too much and do damage to the village and surrounding countryside. Also there is insufficient infra- structure i.e. doctor's surgery, schools and roads etc. to support any increase in local population. Please take these facts into consideration and leave East Goscote as it is.	 The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
Application no.H67 We cannot believe we are once again having to object to planning permission for land at East Goscote after Gladman had permission refused twice. The land floods also we understand is contaminated after Jelson moved soil from original East Goscote site when first building our village. As previously stated we strongly object to the proposed development for the following reasons Local amenities and services are already under pressure ie doctors practiced, schools, roads and parking especially in shopping areas. At times impossible in East Goscote shopping area and Syston is a nightmare due to parked cars along Melton Road, shop car parks are full.	 The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.
	 It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. I am writing with regard to the proposed plan to build another 223 houses in the village of East Goscote. I do not feel that East Goscote is able to support any more houses. The village is a pleasant place to live and I feel very strongly that any further housing would result in over- development which would stretch the current amenities too much and do damage to the village and surrounding countryside. Also there is insufficient infrastructure i.e. doctor's surgery, schools and roads etc. to support any increase in local population. Please take these facts into consideration and leave East Goscote as it is. Application no.H67 We cannot believe we are once again having to object to planning permission for land at East Goscote after Gladman had permission refused twice. The land floods also we understand is contaminated after Jelson moved soil from original East Goscote site when first building our village. As previously stated we strongly object to the proposed development for the following reasons Local amenities and services are already under pressure ie doctors practiced, schools, roads and parking especially in shopping areas. At times impossible in East Goscote shopping area and Syston is a nightmare due to parked cars along Melton Road, shop car parks

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	retired. Many of the 3000 plus patients have been relocated to the two Syston Practices adding to problem of obtaining appointments Even more houses have been built and more proposed around Queniborough, Syston and Barkby. Please take our objections into account when considering the proposal.	
LDCLP/38 Richard Parker	I am writing in regard to the Local Plan you are proposing to put in place for our borough, specifically in relation to the plans around Rearsby and East Goscote. In regard to HS67, 225 houses on land off of Melton Road, East	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where
	Goscote, I also feel this is excessive. The services in East Goscote wouldn't be able to cope. The doctor's surgery has closed, the school has insufficient space for the estimated number of children and the extra traffic on the Melton Road would be significant.	education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report
	Another reason for the Rearsby bypass was to alleviate the number of cars travelling along Melton Road in Rearsby and East Goscote - something that has succeeded.	(2019) explored the implications of the growth scenarios, and the preferred development strategy.
	However, if the two developments went ahead there would be a significant rise in through traffic, negating the benefits of the bypass.	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	I feel that an extra 270 houses over a half mile distance in Rearsby and East Goscote is an excessive burden on the Melton Road area out of Syston. Traffic flow I congestion is already a problem in the area, and this will only add to this. The Wreake valley is an area already prone to flooding and recent	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	experience shows that this situation is only likely to increase. Further building work isn't going to help with this problem. Would it be possible to tell me what investment Charnwood Borough Council is proposing to make in regard to services (schools, doctors, road improvements) if these proposals went ahead?	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
LDCLP/39 Christine & Nigel Dakin	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at	The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.
	 the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback

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	 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	 and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/40 J Bautock	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve 	 The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and

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LDCLP/41	 government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	 spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/41 Dr A Robinson	 The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
		considered as the local plan progresses to the next stage.
LDCLP/42 Chris Brazendale	Concerns that:The proposal of 225 houses in this parcel of land is excessive.	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.

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	 The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
LDCLP/43 Lucy Brazendale	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are 	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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LDCLP/44 Mr G M Carter	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. 	 The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional

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LDCLP/44 Mr G M Carter	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
LDCLP/45 Miss Eleanor Metcalfe	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the 	considered as the local plan progresses to the next stage.The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.The Council continues to liaise with LCC on education matters. Where

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LDCLP/46 Dr Graham & Mrs Joanne Offer	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work.

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LDCLP/47 Virginia & James Toone	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that 	 considered as the local plan progresses to the next stage. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the

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DCLP/49 ohn Parker •	for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough.	 zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.

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LDCLP/58	Concerns that:	The impact of the development in terms of infrastructure requirements
Mr and Mrs Beeson	 The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the 	has been considered as part of the IDP and site selection assessment.
	 The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at 	The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.
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	corridor out of Syston. It will massively outstrip the potential of	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work.
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EDCLP/38 John Malpus	HS67 – During the recent bad weather, some of this land and the area around was flooded even though the report from Gladman Land indicated that it doesn't flood. Construction on this land will increase the chance of flood in the area even with flood prevention schemes in place. Our Borough Councillor has photographic evidence. The Inspectors Report after the public inquiry into the Gladman appeal with regard to this land included a paragraph indicating that the size of the proposed development was inappropriate to the size of the existing village. The ALS between East Goscote and Rearsby will be dramatically reduced. CBC refusal of application P/18/0611/2 contained the following "The development would cause substantive and significant harm to the ALS between Queniborough and East Goscote" This ALS if the development went ahead, would be larger than the one between	 The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. Evidence from the previous application will be reviewed in light of this representation, along with the reasons for refusal, and the subsequent decision at appeal. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
EDCLP/46 Darshan Patel	 East Goscote and Rearsby as it stands at the moment. I strongly disagree with the outlined Strategy for East Goscote to be considered for preferred distribution of new homes. This decision has been made due to the fact that the current infrastructure is just about coping with the number houses in place within East Goscote and bordering area of Rearsby. A new housing development would add an immense pressure on roads via traffic, congestion and pollution via noise. I also feel that the fragile balance of environmental factors such as open fields and grassland that protect the village from flooding would be destroyed and put residents at risk if new houses were to be built. Our countryside needs to be conserved. 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

EDCLP/62 Mrs V HewittSite HS67 E This will res bypass was the traffic or Rearsby - G There is no already acc more injury.EDCLP/94 Mr J FinnemoreConcerns th • The proj • The server	using estate between East Goscote and Rearsby would re is no clear demarcation between the two villages, and g the natural beauty of the area. etary cost of flooding to residents and an increase in traffic pollution would need to be covered by the local authority dents. A weekly compensation would need to be in place num of £1000 per week, per household for the ole future.	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The
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Mr J Finnemore • The pro • The server	Y East Goscote for 223 houses. esult in approximately 1000 car movements. The Rearsby as built to move traffic out of the village. This is increasing once again. The access will be encroaching into the Goscote separation. no cycle lane between Rearsby and Goscote. There are ccidents with cyclists on the road, further traffic will cause ry.	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
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	 major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
EDCLP/110 Paul Matts	I have heard there is a proposal for 47 new dwellings to be built on Gaddesby Lane in Rearsby. Also, a further 223 dwellings about half a mile away on Melton Road, East Goscote. Both villages, in particular Rearsby, suffer heavily from flooding. To take away further green fields would accentuate this problem. There would be less soil to absorb rain water. Once a field is gone it is gone for ever. Building these properties is irresponsible on the grounds of environmental issues. Flooding is a countywide problem, which outs strains on Charnwood Borough Council in dealing with it. Building these dwellings would increase the burden on yourselves. Furthermore, the amenities, in terms of local schools and doctors, cannot support any more inhabitants. The school in Rearsby is already over capacity, as, I understand, is East Goscote's Broomfield school. Rearsby has one local shop. There are no doctors surgeries any more. The proposed building is irresponsible on service grounds. Traffic would increase by at least 600 cars, at an estimate. These vehicles would travel along an already busy Melton Road (A607). It is already dangerous, and the state of the roads in the area is poor. To build these properties is irresponsible on transport grounds. I therefore protest in the strongest possible terms against the building of any of these properties. Village life is already heavily eroded and the villages of East Goscote and Rearsby are almost joined together now. Identity is disappearing fast. The area has already has more than its share of new-builds, with Rearsby Roses	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The Council is engaging with the Environment Agency to confirm that the site(s) fall within Flood Risk Zone 1, and to confirm the necessary assessment work that would follow-on from that conclusion. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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	 (Melton Road), Bloor Homes (again, Rearsby) having popped up within the past five years. Please, no more. The area is being choked and destroyed. I appeal to your responsible nature. Please do not allow any of these dwellings to be built. 	
EDCLP/138 David and Janet Cannon	We have objected at length to the two recent planning applications from Gladman P/18/0709/2 and P/18/2123/2, the latter having resulted in a public inquiry. The Preferred Option for Housing HS67 for 223 houses at East Goscote is inconsistent and illogical, the Borough Council having opposed the application during the public inquiry at great public expense and in great depth and detail. It makes absolutely no sense. East Goscote is identified as an Other Settlement which means it is not suitable in sustainability terms for a development of anything like this size. Also why has East Goscote been allocated such a high number of houses - more than twice any other settlement of this type? Frankly it looks suspect and we hope it will realised that it is a mistake.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application, and the subsequent decision at appeal.
EDCLP/142 Jonathan Proctor	 Concerns that: The proposal of 225 houses in this parcel of land is excessive. The services of East Goscote will not be adequate for the purpose: the school has insufficient space to accommodate a low projection of 100 extra children; the doctor's surgery has closed; the local shopping area is too small; and traffic flow at the A607 island will be hugely increased. The land is low lying and in part prone to flooding. Recent experience shows that situation is likely to increase with climate change. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the

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	 Instead, the blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
EDCLP/246 Andrew Collis Gladman Developments Ltd	 Land off Melton Road mis identified by the Council for 223 dwellings. This represents a reduced capacity for the Site in comparison to the scheme promoted by Gladman. Gladman object to the proposed level of growth identified for the Site and consider that this should be increased to 270 dwellings to reflect most recent proposals for the Site. It is noted that whilst this proposed development of the Site was refused and dismissed on the matter of principle, the previous proposal for the Site was not considered as over development on account of environmental factors, highways or infrastructure capacity as summarised within the Inspector's Report¹. East Goscote is a sustainable settlement featuring a broad range of services and public transport connections. The village therefore is a suitable location at which to meet future housing needs. Referring to the draft Policies Map, Gladman hold two main concerns with the presentation of the Site and extent of its boundaries and other key influencing designations. Firstly, it evident that when reviewing the policies map that the allocation itself does not extend to Melton Road stopping someway short. This ignores the fact that further land located between the edge of the allocation as identified and Melton Road is required to develop the Site, as accepted by highways officers, is to gain access into the Site by way of a new roundabout at the junction of Melton Road and Broome Lane. Securing the delivery of this roundabout and associated access road into the Site would be subject to greater uncertainty if this area was to be considered as open countryside in policy terms. The effect of currently defined boundaries 	Council acknowledges that the promoter contends the site can achieve 270 dwelling. For context, the SHLAA considered the site and provided an assessment based on a yield of 223 dwellings. The Council notes that the promoter's site boundary extends beyond the proposed site allocation, towards the north west to abut Melton Road. This section enters ALS8. The Council would welcome further discussion with the promoter to understand the rationale for the site area. The evidence submitted will be analysed and used to inform the site assessment.

¹ See APP/X2410/W/18/3214382 dated 16th July 2019.

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	 provides for a floating site with no suitable access. The extent of the allocation as currently identified may therefore render the Site undeliverable. In order to address this and secure the effectiveness of the Local Plan in this regard, the extent of the allocation boundary should be amended to include the land to Melton Road as shown on the latest Indicative Development Framework (See drawing reference 8187-L-03 Rev L) for the Site as considered as part of application reference P/18/0709/2 (provided in Appendix 2 to this representation). Secondly and connected to the above, is the inclusion of part of the Site and access route within the Area of Local Separation defined between East Goscote and Rearsby (ALS8). The designation of this part of the Site as an Area of Local Separation represents a threat to the delivery and development of part of the Site given the restrictions of Policy LP19. This generates significant uncertainty for the deliverability of the wider site given the Council's stated aims to protect the predominantly open and undeveloped character of Areas of Local Separation. In addition, Gladman do not consider it reasonable to subject part of the Site to Policy LP19 when Policy LP3 confirms the principle of developing Land off Melton Road, East Goscote for housing. Reflecting on the above, Gladman consider that the area required to develop the Site should be removed from the Area of Local Separation. 	
EDCLP/242 Corey Taylor	I live on Meadow View East Goscote and was very vociferous in my objection to the plans by Gladman Land to build up to 270 houses on the land off of Melton Road. I joined the local objection fight and even spent the day at Gladmans final attempt (following 2 x	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.

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CONSULTEE	planning refusals by the council) in Loughborough at the public enquiry meeting as they had appealed to the secretary of state to fight their refusals, which they also lost. Suffice to say I was elated that the threat of my home being in the midst of a construction site for years had now been removed and I was so happy for all concerned. Indeed my respect for the borough council had gone through the roof as they had stood toe to toe with us to fight the downright mercenary property company from building luxury housing to just make money! So imagine my dismay, when I read the Draft Plan to see that not only had the borough council now resurrected the very plan that they had just weeks before fought against, they would be pushing for it to be built!! It was a kick in the teeth to say the very least.	OFFICER RESPONSE This site has been assessed in the SHLAA, and through the SA. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application, and the subsequent decision at appeal. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive
	The reasons that the multiple planning applications had been refused, were many and varied, indeed the barrister that the borough council engaged to fight the refusal at the public enquiry outlined them and called various witnesses to highlight them, so I am at a loss as to why the council has now performed a 180 on this proposed development and numerous others in the area!!	effects. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.
	 Here is a bullet point list: Traffic (both increased and the dangers associated with it) Transport link Wasted money on a bypass as the traffic would now double 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	 Wasted money on a bypass as the traffic would now double Environmental issues Schools Healthcare Flooding 	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response
	 The site is a wartime landfill, and no one knows what is buried there Gas main runs across the site Overlooking existing properties 	will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	 Overlooking existing properties Construction traffic Combining Rearsby and East Gostcote, hence the villages lose their identity Previous builders had been refused for the same reasons that this development was refused 	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
	The field that HS67 is planned for is a hotbed of nature including various birds, foxes, rabbits and even badgers, this habitat would 669	The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained.

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	 be destroyed by any development. I am sure I have missed many others off, but I am hopeful that you get the gist! The development of so many houses in the area is just not sustainable for many of the reasons as detailed in the list above. I am hopeful that my comments can be added to objections to elements of the draft plan. 	Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
EDCLP/153 East Goscote Parish Council	 At least two planning applications have been made for development upon this site. Planning application P/18/0709/02 was received on 17th April 2018; it proposed 270 dwellings. 81 of the new dwellings were to be "affordable": 15 1-bed and 15 2-bed apartments, 21 2-bed semi-detached and 30 3-bed semi-detached houses. The 189 market dwellings were all to be 2, 3, 4, and 5-bed houses in a variety of configurations. The refusal letter cited three reasons for refusal. Firstly, the proposed site, it stated, lay "outside the limits to development of East Goscotethe proposal is not small scale and not within the settlement boundary and neither has a local housing need been demonstrated." Secondly, the proposal's impact upon landscape and countryside was also deemed to be unacceptable; in particular, the applicant had failed to demonstrate adequate mitigation for "the adverse impact of this development upon biodiversity, including failing to provide a satisfactory alternative for existing mitigation relating to the Rearsby Roses development." Thirdly, the proposal failed to deliver "an appropriate level of affordable housing and contributions towards sustainable travel, ecology, education, libraries, civic amenity,local community facilities, health care, open space, [and] play provision". The applicants appealed against the decision; but the Planning Inspectorate rejected the appeal (ref. no. APP/X2410/W/18/3214382). The Inspector acknowledged that adverse impacts upon landscape character and biodiversity could to some extent be mitigated, but agreed with the Council that the proposal would be contrary to policy – including those in the recently-adopted Core Strategy. In the meantime, the applicants submitted planning application ref. P/18/2123/2, which was received on 24th October 2018 and was essentially the same proposal for 270 dwellings. 	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation. This site has therefore been assessed in the SHLAA, and through the SA. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application(s), and the subsequent decision at appeal. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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	 The proposal was rejected on 25th April 2019. It was rejected for the same reasons – apart from the impact upon biodiversity, which, the Council agreed, could be addressed via planning conditions requiring detailed mitigation measures. A study of Local Areas of Separation in 2016 identified the area in between Rearsby and East Goscote as a potential ALS. At this time, part of the potential ALS – the Rearsby Roses site – was suggested as a housing site, but within the current Plan, the whole of the ALS as proposed in 2016 has been designated as such. The current Local Plan Preferred Options draft, however, allocates this site as a suitable location for 223 dwellings. We find this to be a surprising decision. CBC has twice rejected development on this site on the grounds that it is contrary to policy as expressed in their recent Core Strategy. In the context of the Plan as whole, the allocation is unusual. As we note above, East Goscote is classified as an "Other Settlement" within the Plan. In the 2015 CS, such settlements were expected to accommodate only small-scale development, but a shift in emphasis appears to have occurred, such that reasonably large housing allocations have been made in several of them. However, no other "Other Settlement" is expected to accommodate as many additional dwellings as East Goscote. The capacity of the site is over twice that of the next largest allocated site in an Other Settlement – Threeways Farm, at Queniborough. East Goscote is an unusual settlement, having been built on the site of Royal Ordnance Factory no 10 Queniborough, completed in 1942. Part of the site became a MoW supply depot in 1945 and the remainder of about 270 acres became derelict. It is about 10km from the centre of Leicester. Although it is geographically close to the next moderately-sized settlement, Syston, it is severed from it by the busy Syston Northern Bypass. East Goscote does not have a train station. Bus services are in	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. Landscape, biodiversity, and ecology issues were considered in the site selection assessment via the SHLAA. The evidence in this response will inform updates to the site assessments. Further landscape sensitivity assessments and ecology assessments will be taking place in light of the consultation responses.

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	 private car. A transport assessment submitted as part of the previous planning applications found that the development would be likely to lead to 146 two-way trips in the AM peak hour and 137 trips in the PM peak hour. Large increases in traffic were predicted at the Melton Road/ Broome Road junction as a consequence of the development. Concerns have also been raised about an increase in air pollution as a consequence of increased traffic. Charnwood Borough Council has already designated the main road running through the nearby village of Syston as an Air Quality Management Area (AQMA) – an area where current air quality standards are not being met, and where the local authority must produce a plan for meeting them. However, the current proposals for development in East Goscote seem likely to increase pollutant levels, since Syston is the nearest village to the site with a reasonable number of facilities and services and it is likely that journeys between the two villages would increase as a consequence of East Goscote's expansion. The principal flood defence for East Goscote is the concrete channel along the village's southern boundary, into which the Queniborough Brook flows after its union with the Gaddesby Brook. This channel, completed in Spring 1942, straightened and confined what was previously a meandering stretch of the Brook in an open flood plain, to protect the Royal Ordnance Factory and to meet its water supply needs. The local area as a whole has extensive areas of flood risk. The southernmost extremity of the site is adjacent to a stream called the Gaddesby Brook development to these zones. The indications are that flood risk is likely to increase over the Plan period. Firstly, because climate change is likely to lead to more extreme weather events, including heavier rainfall; this will increase the likelhood of localised flooding. Secondly, because development in the local area (Timber Yard, the area and hence the speed and quantity of run-of	

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	 Rearsby Grange and Rearsby Roses) and the Rearsby Bypass all discharge water into the Gaddesby Brook; the flooding implications of the Timber Yard development were recognised at the time of its construction, as land was excavated in order to raise development above the flood plain and provide a basin for flood water from the brook. Meanwhile, the paving of front and rear gardens within existing development has increased. Estimates of the amount of permeable land lost over 10 years are between 30 and 50%. Recent flood events - including a notable event in November2000 when the defences were breached – suggest that flood risk is increasing, and that, therefore, further development of the kind proposed in the Plan increases risks to properties in Watergate and Long Furrow, East Goscote , and Rupert Crescent, Queniborough. The site is currently in use as agricultural land. However, 2.7 ha to the south of the site were exploited for sand and gravel from around the commencement of the war to build Royal Ordnance Factory no10. The exact usage of this site over the wartime and post-war period is uncertain; due to the site being a Ministry of War site, details of its use were redacted from publicly-available Ordnance Survey mapping as late as 1958. However, aerial photos in 1945 and 1947 show rows of material upon the site – perhaps sand and gravel, perhaps material associated with the ordnance factory. As well as being used as a source of materials for the factory, it may have been used in day-to-day operations and may have been used for waste disposal. Evidence provided in the Planning applications indicates that waste was deposited until 1982. This needs research and consideration prior to any development. The village of East Goscote falls within the Wreake Valley area as designated in the Charnwood Landscape Character Assessment. This document states, "The area east of Broome Lane, East Goscote, has a rural characterretaining a remote countryside appearance and agricul	

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	 of hedges and roadside verges. New development should preserve the open character of the Wreake valley, and have regard for the views across the valley Enhance the Wreake Valley landscape character around the fringes of the existing larger settlements by increasing tree cover Seek to mitigate the harsh urban edge of East Goscote Support the restoration of sand and gravel extraction pits to provide opportunities to deliver recreation where landscape and biodiversity objectives can be achieved. 	
	• Although the development does not entail development within a designated Area of Local Separation as set out in the Local Plan, the proposal would entail the development of land falling between the villages of East Goscote and Rearsby. As Rearsby Parish Council pointed out in their comments upon the proposal, two recent Planning Inspectorate decisions have upheld the importance of separation between the two villages, and the importance of preserving the landscape of the Wreake Valley: the Rearsby Roses development Appeal, App/X2410/A/12/2187470, concerning land along the east side of Melton Road adjacent to Rearsby Roses; and the Jelson appeal, App/X2410/W/17/3190236 concerning land along Melton Road.	
	 As the Landscape Character Assessment states, "The River Wreake forms the principal wildlife corridor in across the areaits tributaries provide local habitat connectivity. Key habitats are wet woodlands, marshes, ponds and hedgerows." An ecological appraisal of the site found that it consisted of "fields ofarable land and poor semi-improved grassland with 	
	 boundaries formed of hedgerows with mature trees and fence lines. A pond was located in the north of the site which was created in 2015/2016 as part of the proposals for the extant residential development to the south of the site (Charnwood Borough Council Ref: P/12/1709/2). Additional habitats recorded within the site include small areas of disturbed ground with tall ruderal and ephemeral/short perennial vegetation,and scattered scrub." All but two of the hedgerows were deemed to be "habitat of 	
	principal importance under the NERC Act". Four "were found to	

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	 be of High or Higher conservation value." Comments were made at the time of the first application on this site (P/18/0709/02) about the adequacy of the ecological appraisal. The appraisal did not consider brown trout within the Gaddesby Brook, grass snake records within 500m to the south of the site, suitable hedgehog habitat in woodland adjacent to the site, suitable hedgehog habitat in woodland adjacent to the site, suitable otter habitat adjacent to the site, and habitat for notable farmland birds including fieldfare, lapwing, yellowhammer, barn owl, skylark and starling. One of the three fields comprising the site did not appear to have been surveyed, and some categorisation of hedgerows and grassland may not have been objective. Comments were also made about a badger report relating to this site, which appears from the ecological appraisal to be confidential. The comments express concerns about the adequacy of the impact assessment and suggested mitigation measures. The classification of a sett, S2, which would be closed due to the development, as "subsidiary" does not seem to have been justified; nor does the assertion that this sett could be closed without causing stress to badgers. The badger report did not consider how development might affect access to the adjacent woodland, and it was not clear whether newly-created habitat associated with the development would compensate for losses. Concerns were expressed over the adequacy of ecological mitigation measures. Although the proposal "might be capable of avoiding biodiversity net loss" "the documents submittedhave not objectively demonstrated that this is possible." This, in fact, was one of the three reasons given for the application's refusal, although, as we note above, by the time of the second application on this site (P/18/2123/2), an agreement had been reached between the applicant and CBC in this respect. 	
	With regard to the site off Melton Road, East Goscote, we comment as follows:	
	• CBC have hitherto defended their spatial and development strategy for the borough by rejecting excessive development in 'Other Settlements' - not only on this site, but in other similar locations. It is very odd that, having rejected development upon this site twice and having fought an appeal against that rejection on the	

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	 basis of recent planning policies, that CBC should now consider it to be suitable for development. The appearance of the site at this point, when it did not feature in the map of "suggested or promoted sites" in 2018, means a lack of continuity or consequence between consultation documents. Development upon this site would lead to a number of environmental and social impacts: pressure upon local services, particularly the local schools and health services potential additional traffic and road traffic accident risk landscape impact upon the Wreake Valley an increase in flood risk within the Gaddesby Brook and Queniborough Brook corridors biodiversity impact upon hedges, grassland, badger habitats and the wildlife corridor adjacent to and including the Gaddesby Brook; concerns have been raised about the adequacy of ecological appraisal relating to these habitats To a great extent, town planning is about site selection, or at least about determining what sort of sites should be built upon. Notwithstanding the importance of good design, a well-designed development on an inappropriate site is still a failure of planning. The Government's guidance on site allocations states that, when allocating sites, LAs should consider: physical limitations or problems such as access, 	
	 infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; environmental/amenity impacts experienced by would be occupiers and neighbouring areas . We do not believe that these points have been taken into consideration in the allocation of the site off Melton Road, East Goscote. Furthermore, the volte-face with regard to allocation of this site, following two rejected planning applications and an 	

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	unsuccessful planning appeal, seems perverse. The allocation is questionable not only because of the many good reasons why this site should not be developed, but because until extremely recently, Charnwood Borough Council itself seemed to be determined to preserve it.	
DCLP-425-470 Environment Agency	• The site area includes the flood zone 2 extents. Most development types are appropriate for this flood risk zone but must take into account the flood risk (1% to 0.1% annual exceedance probability). A flood risk assessment must be completed for all development within flood zone 2 and must consider the entire lifetime of the development. The site is partially underlain by a historic (closed) landfill and therefore any redevelopment of the site will need to ensure no risk is posed to the water environment.	 Flood Risk Zone 2 appears to just edge into the southern site boundary nearest to Gaddesby Brook. The Council wishes to engage with the Environment Agency to confirm that the site itself falls within Flood Risk Zone 1, and to confirm the necessary assessment work that would follow-on from that conclusion. The Council will be preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
DCLP-264 LCC - Education	 Primary (Broomfield Community Primary School): School is content to expand and would be able to accommodate growth in Rearsby which is within walking distance. Secondary (Wreake Valley): Sufficient places at Wreake Valley however, developments for secondary places at Thorpebury (North East of Leicester) may have an effect. 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.
EDCLP/196 Mark Richardson	I would like to express some concerns regarding both HS73 & HS67: HS73 - 47 new houses on land off Gaddesby Lane, Rearsby. I can only assume that no-one in the Planning Department lives in Rearsby, or has even been to Gaddesby Lane in Rearsby. The junction of Gaddesby Lane and Melton Road is already a dangerous junction with a long history of accidents, so why would you even contemplate significantly increasing the amount of traffic through this junction ? The Rearsby Neighbourhood Plan identified the top of Gaddesby Lane as a potential for 'ribbon development of no more than 10 houses' - so where on earth did 47 come from ? The village has no facilities other than 2 pubs, 1 tearoom and a very small school - so adding 47 houses could equate to over 100 additional residents - where will their children go to school as Rearsby is already full ? Rearsby has suffered badly from flooding recently, so adding 47 houses adds yet more hard standing and removes yet more land to soak up the rainfall. The drains on Gaddesby Lane are struggling now to cope with the excessive	 The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation. This site has therefore been assessed in the SHLAA, and through the SA. Evidence will be reviewed in light of this representation. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The impact of the development in terms of infrastructure requirements

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	amounts of water being received, so adding more housing is only going to exacerbate the flooding issue. Furthermore, this does not conform to the stated objective of 'infilling', which is crucial to maintaining the identity of a small village community. In the Draft Plan, you talk about sustainability as being one of the key principles - yet this proposal is totally unsustainable - throwing another 100+ residents into a small village with almost no local services.	has been considered as part of the IDP and site selection assessment. The Council continues to liaise with LCC on education matters. Where education infrastructure is required this will be delivered by LCC.
	HS67 - 225 houses off Melton Road, East Goscote. Why would you even consider this proposal ? There is a minimal amount of local services in East Goscote - no doctors surgery, only 3 or 4 shops, and a school which could not cope with 100 more children, let alone 200-300 more. The A607 traffic island is already busy, and is regularly jammed solid on a morning with traffic backing up from the A46 and down the East Goscote bypass. This traffic in turn backs up into Queniborough and East Goscote, so throwing another 200 + vehicles into this scenario every morning will only add further misery to commuters daily journeys.	
	Why is the council obsessed with filling in the Melton Road corridor ? Why not look at infill developments in other villages which could help to spread the impact of the new housing requirement ? If you include HS 71 and HS 72, it suggests over 400 houses could be located within a 2 mile area - an area which is already struggling with traffic and flooding, and which has minimal or no local services. Yet there are no housing developments planned for Seagrave, Thrussington, Burton, Walton, etc - some of which already have more local services than Rearsby & East Goscote ! I know we have to have more new houses to satisfy the likely requirements, but surely these are better done via whole new communities where the local services can also be built, and by small infill developments on the edge of all local villages, and not just by overloading certain villages.	
EDCLP/256 John Weston	HS6, HS7, HS8, HS9, HS10, HS11, HS67, HS71 and HS72 - The housing allocations for Syston, Queniborough and East Goscote have all been refused this year	Noted - The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.
DCLP/261 Edward Argar MP	The proposal for 223 properties at HS67 (land of Melton Road in East Goscote) is completely inappropriate for the reasons set out in the multiple objections to similar proposals by a developer earlier this year, and because it would further eat away at the areas of	The sites have been assessed in the SHLAA, and through the SA. The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.

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EDCLP/252 Leicestershire County Council	separation between villages in the area, undermining their particular individual character, and running counter to other proposed policies in the Local Plan to protect the character of villages/ towns and maintain separation between settlements. In each of these cases the scale of the proposed development would, I believe, risk significantly altering the character of the existing village of itself, as well as running the risk of eroding the separation and separate unique identities of the village. This is quite apart from broader concerns about the impact of additional pressures on local infrastructure arising from development of such a scale. While I believe overall in its thrust the Plan is a sound basis for future planning, I strongly believe that the above proposals are not the most appropriate way to proceed. Land off Melton Road, East Goscote (223 dwellings): The site does not abut Melton Road nor any adopted highway. It is bordered to the east by the A607 Rearsby Bypass (60mph) which is a key route between Melton and Leicester; any proposed new access on the A607 may be restricted by policy IN5 of the LHDG. The A607 leads to the wider Strategic Road Network (A46 and M1); this will need to be reflected / considered in any transport assessment work.	 This site has been assessed in the SHLAA, and through the SA. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. Noted – Current analysis does not place an access directly on to the A607. Indeed, the consultation response from the promoter places the access point at Melton Road / Broom Lane. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out in conjunction with LCC, and the feedback and information from this response will be included in the work. The Council looks forward to collaborating with LCC to confirm the transport impacts across the borough.
	addesby Lane, Rearsby	
DCLP/166 Mr David Hewitt	Site HS73 Rearsby for 47 houses: This will result in approximately 200 car movements. The Rearsby bypass was built to move traffic out of the village. This is increasing the traffic once again. The access will be onto the junction where a fatal accident occurred. There is no cycle lane between Rearsby and Goscote. There are	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	already accidents with cyclists on the road, further traffic will cause more injury.	 Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery
DCLP/201	The Land off Gaddsby Lane in Rearsby that has been identified for 679	The Council acknowledges the work done by the community to progress

 in the Rearsby Neighbourhood Plan which is at Regulation 14 stage. The RNP clearly identified the Gaddesby Lane for a ribbon development of up to ten houses under exception site rules as suitable for this small village. The recent planning appeal in 2018 about Land off Metlon Road found that the proposed development of 66 houses would be too large for such a small village of approx 450 houses to sustain. The proposal in the local plan is for 47 houses and is not sustainable for such a small village of approx 450 houses to sustain. The proposal in the local plan is for 47 houses and is not sustainable for such a small village of approx 450 houses to sustain. The proposal in the local plan is for 47 houses and is not sustainable for the area with all these houses being situated in other settlements which by their definition do not have access to local services and hence are not sustainable. To believe this density of housing in such an area is viable is not realistic for the communities or the house builders. DCLP/264 HST3 - 47 Houses in land off Gaddesby Lane. 1. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. The upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, Convent. 2. The figure of 47 massively and unrealistically inflates this. It closes approaches that of Jelson for the development off Metton Road that was turned down at planning appeal in 2018 on the grounds of unsuitability within a small settlement with no local services. 3. It would greatly increase traffic flow at the Gaddesby Lane/Metton Road that was turned down at planning appeal in 2018 on the grounds of unsuitability to the right for vehicles leaving Gaddesby Lane. 4. It does not conform to the objective of infilling. It is expansion. There is potential for infilling along the Metton Road. 5. It removes p	OFFICER RESPONSE
Mrs Victoria Needham1. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. The upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, Convent. 2. The figure of 47 massively and unrealistically inflates this. It closes approaches that of Jelson for the development off Melton Road that was turned down at planning appeal in 2018 on the grounds of unsuitability within a small settlement with no local services. 3. It would greatly increase traffic flow at the Gaddesby Lane/Melton Road junction. This has a history as an accident black spot due to the complete lack of visibility to the right for vehicles leaving Gaddesby Lane. 4. It does not conform to the objective of infilling. It is expansion. There is potential for infilling along the Melton Road. 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan.It is expansion. The Council is p will help inform to demand, cost, ti	abourhood Plan. The Pre-Submission Draft of the urhood Plan was submitted for comment in February 2019. , at time of writing, the proposals in the Neighbourhood Plan do any statutory weight. will be reviewed in light of this representation, along with the for refusal on the previous application. Act of the development in terms of infrastructure requirements considered as part of the IDP and site selection assessment.
	ncil acknowledges the work done by the community to progress abourhood Plan. The Pre-Submission Draft of the urhood Plan was submitted for comment in February 2019. , at time of writing, the proposals in the Neighbourhood Plan do any statutory weight. will be reviewed in light of this representation, along with the for refusal on the previous application. hcil is aware of the potential transport impacts associated with elopments. The Charnwood Local Plan Option Testing Report splored the implications of the growth scenarios, and the development strategy. ansport modelling work is being carried out, and the feedback mation from this response will be included in the work. hcil is preparing a Sustainable Transport Study, this response nform that study. Opportunities for sustainable transport s and infrastructure will be explored, subject to an analysis of cost, timescale, and delivery of Local Separation (ALS) is reinforced through Draft Local cy LP19, with ALS8 (Rearsby/East Goscote) maintained.

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		Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
DCLP/265 Mrs Lynn Morgan	HS73 – 47 houses in land off Gaddesby Lane. 1 The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones; New Avenue;	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.
	Covent; Melton Road). 2 The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.
	that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 3 It would greatly increase traffic flow at the Gaddesby Lane- Melton Road crossroads. This has a long history as an accident black spot due to complete lack of visibility to the right for vehicles	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	 4 It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road. 	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	 5 It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan HS73 & HS67: BROADER OBJECTIONS. 1 270 houses proposed over half a mile in Rearsby and East 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery
	Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the	The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
	fringe of the town will exacerbate this. 2 It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the
	3 Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town	'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
DCLP/266	that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. HS73 - 47 houses in land off Gaddesby Lane	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The Council acknowledges the work done by the community to progress

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Mrs Julie Finnemore	 The RNP, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones: New Avenue: Convent: Melton Road) The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road that was turned down at planning appeal in 2018 on the grounds of lack of sustainability within a small settlement with no local services 3. It would greatly increase traffic flow at Gaddesby Lane - Melton Road crossroads. This has a long history as an accident blackspot due to complete lack of visibility to the right for vehicles leaving Gaddesby Lane. It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road. It removes part of the proposed extension to the area of local separation set out in the RVP Including other developments proposed (HS67 & HS73), 270 houses are proposed over a half mile in Rearsby and East Goscote. This is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic flow in to Syston, already a major problem. Additional proposed development in the fringe of the town will exacerbate this. The level of development is disproportionate to other local villages. No extension of housing is proposed in Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets.\ Instead of proposing the further extension to the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan needs to be developed such as making use o	 the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
DCLP/279 Dr Roy Loveday	HS73 – 47 houses in land off Gaddesby Lane. 1 The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	small size of the village and the very significant contribution made	not carry any statutory weight.
	to housing stock in previous years (Bluestones; New Avenue; Covent; Melton Road).	Evidence will be reviewed in light of this representation, along with the
	2 The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road	reasons for refusal on the previous application.
	that was turned down at Planning Appeal in 2018 on the grounds of	The Council is aware of the potential transport impacts associated with
	unsustainability within a small settlement with no local services. 3 It would greatly increase traffic flow at the Gaddesby Lane-	new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the
	Melton Road crossroads. This has a long history as an accident black spot due to complete lack of visibility to the right for vehicles	preferred development strategy.
	leaving Gaddesby Lane.	Further transport modelling work is being carried out, and the feedback
	4 It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road.	and information from this response will be included in the work.
	5 It removes part of the proposed extension to the area of local	The Council is preparing a Sustainable Transport Study, this response
	separation set out in the Rearsby Village Plan HS73 & HS67: BROADER OBJECTIONS.	will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of
	1 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles	demand, cost, timescale, and delivery
	when HS 71 and 72 are included) is an excessive burden to place	The Area of Local Separation (ALS) is reinforced through Draft Local
	on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston,	Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic
	already a major problem. Additional proposed development on the fringe of the town will exacerbate this.	Landscaping / Open space within the proposed allocation.
	2 It is also disproportionate. No extension of housing is proposed	The preferred development strategy is an urban concentration and
	for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small	intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and
	scale infill units could aggregately achieve government targets.	spatial strategy options. The Second Interim SA Report notes that the
	3 Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal	'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the
	cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited, by	fewest significant negative effects, and the greatest significant positive effects.
	virtue of its location on the A46, for the development of a new town	
	that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and
	between Leicester and Loughborough.	considered as the local plan progresses to the next stage.
DCLP/296 Mrs Ann Stewart	HS73 - 47 Houses off Gaddesby Lane, this area was identified as a ribbon development of no more than 10 houses due to the housing	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the
	developments that have already been granted in the area. 47 new houses in this area is unrealistic and unsustainable for a village	Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do
	with no local services. Locals schools are already oversubscribed	not carry any statutory weight.
	and little chance of expanding and also the Medical facilities are non existent without travelling to Syston, which again would	Evidence will be reviewed in light of this representation, along with the

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	increase vehicular traffic in the area. There is also the question of	reasons for refusal on the previous application.
	the access that would be required to the junction of Gaddesby Lane and Melton Road which would use a road that was deemed dangerous due to fatalities that have occurred. Also I feel that the area of local separation has been ignored in the Rearsby Village Plan.	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
		Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
		The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery
DCLP/297 Mr Tony Carter	 HS73 – 47 houses in land off Gaddesby Lane. 1 The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones; New Avenue; Covent; Melton Road). 2 The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 3 It would greatly increase traffic flow at the Gaddesby Lane-Melton Road crossroads. This has a long history as an accident black spot due to complete lack of visibility to the right for vehicles leaving Gaddesby Lane. 4 It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road. 5 It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan HS73 & HS67: BROADER OBJECTIONS. 1 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip 	 The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained.
	the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this.2 It is also disproportionate. No extension of housing is proposed	Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. The preferred development strategy is an urban concentration and
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RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
DCLP/343 Mrs Jane Baker	for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. 3 Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. HS73-houses in land off Gaddesby Lane 1. The RNP under exception site rules, identified Gaddesby Lane as a potential site for ribbon	 intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019.
	 development of no more than 10 houses. That upper limit was founded on the small size of the village and the significant contribution already made to housing stock previously with Blue stones, New Avenue and now the convent. 2. The figure of 47 is unrealistic and massively inflates this, Rearsby is a small village with lack of sustainability and no local services. it would greatly increase the flow of traffic through the village, which due to increased fatalities and being an accident black spot will place the village back to where it was prior to the bypass being built. 3. Local schools and GP practices are already overwhelmed and unable to cope. 4. The Plan does not conform with the objective of infilling, it is expansion. It will aslo place excessive burden on the Melton road out of Syston, increasing traffic flow in to Syston which is already a 	 However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	 major problem. 5. The level of development is not in proportion with other local villages. No extension of housing is proposed in Trussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other areas in the east of the borough, where multiple small scale infill units could achieve government targets. 6. The Land is low lying and prone to flooding, this is likely to only 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	get worse with climate change. 7. Expected depreciation in current dwellings backing on to this development. HS73 & HS67 Instead of proposing further extension of the Leicester urban area along the Melton Rd corridor, separated only by minimal cosmetic	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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	green areas, a more far sighted plan needs to be developed. The blank six hills area is ideally suited, by its situation and location on the A46. the development of a new town here would take the pressure off the corridors northwards out of Leicester.	 The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
DCLP/387 Mr Norman Corner	HS73 47 Houses in land off Gaddesby Lane The proposed site is badly draining, and floods frequently. Access to this triangle of land is difficult in every direction. If the access is via Gaddesby Lane this will have some serious consequences. Small ribbon development is taking place, and is already adding problems to the risk of accidents at the junction with Melton Road. We have already had some near misses ourselves, and have witnessed others. The view to the right is very limited, and exiting from the necessary standstill position runs the risk of an accident. Any further development causing more traffic on Gaddesby Lane would only add to this serious risk. The proposed development would, if access was via Gaddesby Lane, be inconsistent with the objective of development infill, and would represent a major expansion. Such a large development would not be in keeping with retaining the integrity and character of the village, and inconsistent with the already rejected Jelsons development, and does not fit with both the Rearsby Village Plan and the agreed concept of local separation. HS73 and HS67 Again, the proposals are inconsistent with appropriate scale of development in the villages, and also with the objective of retaining separation and the character of the villages.	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment).
DCLP/418 Mr Ashley Hollis	 HS73 - 47 houses on land off Gaddesby Lane. 1. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as 	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
CONSULTEE	 a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and contribution made to housing stock in previous years. 2. The figure of 47 massively and unrealistically inflates this. 3. It would greatly increase traffic flow at the Gaddesby Lane-Melton Road crossroads. This has a long history as an accident black spot due to lack of visibility to the right for vehicles leaving Gaddesby Lane. 4. It does not conform to the objective of infilling. It is expansion 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan. HS73 & HS67: Broader Objections 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 houses in less than 2 miles when HS71 and HS72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic flow into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. 2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other villages to the east of the borough. 3. Instead of proposing the further extension of the Leicester urban area along Melton Road corridor, a more far sighted plan should be developed. The blank area of the Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off the corridors northwards out of Leicester and Loughborough. 	 However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
DCLP/420 Mr Neil Lewin	I wish to object to the planned building of additional houses between East Goscote and Rearsby. There was a significant amount of evidence raised in objection to this plan on its initial hearing. Nothing has changed with regards to the proposed site and the many issues raised at the time. At the initial hearing the planned development by Gladmans was thrown out and yet it has reappeared in the Councils plans for the future.	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.This site has been assessed in the SHLAA, and through the SA.Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application, and the subsequent

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DCLP/421	This is a ridiculous waste of energy and effort by all parties, a decision was made based on solid evidence and overturned with no further arguments put forward to change the case. What is happening to democracy in this Country? There is a great deal of suspicion arising from this rapid turn around in decision making by Charnwood Borough Council. HS73 - Land off Gaddesby Lane, Rearsby (47 homes)	decision at appeal. The Council acknowledges the work done by the community to progress
Mr Steven Lehner	I do not think this is an appropriate site for the following reasons: 1 Safety has not been sufficiently considered relating to this plan and is of fundamental importance. This proposal would greatly increase vehicle use of the Gaddesby Lane / Melton Road junction. This has a long history as an accident black spot, due to the	the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.
	extremely limited visibility on exiting Gaddesby Lane. This has included a fatal road traffic collision. Vehicles turning onto Melton Road from Gaddesby Lane, and likewise vehicles approaching	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.
	Gaddesby Lane along Melton Road (from the Melton direction) have heavily restricted visibility of one another. In the interests of safety it is critically important that the use of this dangerous junction be limited as much as possible. 2 The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones; New Avenue;	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Convent; Melton Road). 3 A suggested figure of 47 homes massively and unrealistically inflates this. It closely approaches that of the proposed Jelson development off Melton Road, which was turned down at Planning Appeal as recently as 2018 on the grounds of unsustainability	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	within such a small settlement with no local services. 4 This proposal does not conform to the objective of "infilling". It is clearly expansion. However, there is potential for infilling elsewhere	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	 along Melton Road and this should be considered as an alternative solution. 5 This development would remove part of the proposed extension to the area of local separation as set out in the Rearsby Village Plan, which we believe is important to protect for the nature and 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	individuality of the community. Additional Objections relating to HS73 & HS67 1 270 new homes proposed across Rearsby and East Goscote is	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	an excessive burden to place on these two small villages. Neither village has the facilities nor the school spaces to support these	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work.

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	additional homes. This is particularly the case for Rearsby, where the school site has no feasible space for expansion of the building without significant loss of learning environment and a consequent deterioration of educational provision. 2 It is also disproportionate when viewed comparatively across the plan, as no extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough. However, multiple small scale infill projects in these villages could cumulatively achieve the required government targets, whilst having limited impact on individual communities or causing unsustainable strain on local services. 3 Instead of proposing further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan is required. The area of Six Hills is ideally suited, by virtue of its location close to the A46, for the development of a new town that would take the pressure off the corridors northwards out of Leicester and the tendency to conurbation development between Leicester and Loughborough.	The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/27 Mr R Gordon- Smith	 HS73 - 47 houses in land off Gaddesby Lane. 1. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones; New Avenue; Covent; Melton Road). 2 The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 3. It would greatly increase traffic flow at the Gaddesby Lane-Melton Road crossroads. This has a long history as an accident black spot due to complete lack of visibility to the right for vehicles leaving Gaddesby Lane. 4. It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road. 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan HS73 & HS67: BROADER OBJECTIONS. 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) 	 The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.

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	 is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. 2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. 3. Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. 	 Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part
LDCLP/28 Mrs P A Gordon- Smith	 HS73 - 47 houses in land off Gaddesby Lane. 1. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones; New Avenue; Covent; Melton Road). 2 The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 3*. It would greatly increase traffic flow at the Gaddesby Lane-Melton Road crossroads. This has a long history as an accident black spot due to complete lack of visibility to the right for vehicles leaving Gaddesby Lane. 4. It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road. 5. It removes part of the proposed extension to the area of local 	of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

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	 separation set out in the Rearsby Village Plan HS73 & HS67: BROADER OBJECTIONS. 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. 2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. 3. Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough. *I recall that in the late 1940's early 50's Auster Crowcroft used Gaaddesby Lane as their main exit. The queues and hold ups were long ever then, when there was hardly any traffic on the road 	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and
LDCLP/38 Richard Parker	I am writing in regard to the Local Plan you are proposing to put in place for our borough, specifically in relation to the plans around Rearsby and East Goscote. In 2018 plans for a development in Rearsby were turned down at Planning Appeal as it was found that it was unsustainable in a village with no local services. However, even though there are no more services in the village a site at the top of Gaddesby Lane has been earmarked as suitable for a development of 47 houses (HS73). The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. The figure of 47 not only massively overinflates this but is also an	 considered as the local plan progresses to the next stage. The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation. This site has been assessed in the SHLAA, and through the SA.

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	expansion development rather than an infill development. The amount of extra traffic along Gaddesby Lane would,in my opinion be dangerous as, before the Rearsby bypass, it was known as an accident blackspot due to the narrow width of the road and the complete lack of visibility to the right for people leaving Gaddesby Lane. One of the reasons for the bypass was to try and stop any further deaths on Gaddesby Lane. However, if the two developments went ahead there would be a significant rise in through traffic, negating the benefits of the bypass. I feel that an extra 270 houses over a half mile distance in Rearsby and East Goscote is an excessive burden on the Melton Road area out of Syston. Traffic flow I congestion is already a problem in the area, and this will only add to this. The Wreake valley is an area already prone to flooding and recent experience shows that this situation is only likely to increase. Further building work isn't going to help with this problem. Would it be possible to tell me what investment Charnwood Borough Council is proposing to make in regard to services (schools, doctors, road improvements) if these proposals went ahead?	 Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
LDCLP/39 Christine & Nigel Dakin	 Draft Charnwood Local Plan 2019-36 I would like to object to some of the proposals to the Local Plan as follows: HS73 - 47 houses in land off Gaddesby Lane 1. The visibility coming out of Gaddesby Lane, even as a pedestrian who can walk further round the corner to see better, is very poor/ dangerous. This has been born out by the fact that 2 people have died in the past in accidents crashing into the house opposite. I don't believe that a mini roundabout would solve this problem. This was one of the reasons the bypass to the village was built, has this been forgotten so soon. Increasing traffic to this junction again would potentially bring more accidents, particularly as it is the only route to school for many. 2. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10. houses. That upper limit was. founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, The 	 has been considered as part of the IDP and site selection assessment. The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 Convent and Melton Road). 3. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 4. It does not conform to the objective of infilling. It is expansion. There is no potential for infilling along Melton Road. 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Plan. 6. The village school is small, only approximately 90 children. Even if there were only one child per household this number would be too large for the school to cope with. There is no doctors in the village, the doctor's surgery in East Goscote has just closed and it is very hard to get appointments in the Syston surgery already. There are no other services in the village and no scope to provide them. HS73 & HS67 - Broader objections 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic flow into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/40 J Bautock	 scale infill unfits could aggregately achieve government targets. Draft Charnwood Local Plan 2019-36 I would like to object to some of the proposals to the Local Plan as follows: HS73 - 47 houses in land off Gaddesby Lane 1. The visibility coming out of Gaddesby Lane, even as a pedestrian who can walk further round the corner to see better, is very poor/ dangerous. This has been born out by the fact that 2 people have died in the past in accidents crashing into the house 	 The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.
	opposite. I don't believe that a mini roundabout would solve this problem. This was one of the reasons the bypass to the village was built, has this been forgotten so soon. Increasing traffic to this junction again would potentially bring more accidents, particularly	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and

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	 as it is the only route to school for many. 2. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10. houses. That upper limit was. founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, The 	spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Convent and Melton Road). 3. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned down at Planning Appeal in 2018 on the grounds of unsustainability	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	within a small settlement with no local services.4. It does not conform to the objective of infilling. It is expansion.There is no potential for infilling along Melton Road.	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Plan. 6. The village school is small, only approximately 90 children. Even if there were only one child per household this number would be too large for the school to cope with. There is no doctors in the 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	village, the doctor's surgery in East Goscote has just closed and it is very hard to get appointments in the Syston surgery already. There are no other services in the village and no scope to provide	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	them.	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work.
	HS73 & HS67 - Broader objections1. 270 houses proposed over half a mile in Rearsby and EastGoscote (425 in less than 2 miles when HS71 and 72 are included)	The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
	is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic flow into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this	The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
	2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill unfits could aggregately achieve government targets.	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
_DCLP/41 Dr A Robinson	Draft Charnwood Local Plan 2019-36 I would like to object to some of the proposals to the Local Plan as follows: HS73 - 47 houses in land off Gaddesby Lane 1. The visibility coming out of Gaddesby Lane, even as a pedestrian who can walk further round the corner to see better, is	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
RESPONSE NO/ CONSULTEE	 very poor/ dangerous. This has been born out by the fact that 2 people have died in the past in accidents crashing into the house opposite. I don't believe that a mini roundabout would solve this problem. This was one of the reasons the bypass to the village was built, has this been forgotten so soon. Increasing traffic to this junction again would potentially bring more accidents, particularly as it is the only route to school for many. 2. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10. houses. That upper limit was. founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, The Convent and Melton Road). 3. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 4. It does not conform to the objective of infilling. It is expansion. There is no potential for infilling along Melton Road. 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Plan. 6. The village school is small, only approximately 90 children. Even if there were only one child per household this number would be too large for the school to cope with. There is no doctors in the village, the doctor's surgery in East Goscote has just closed and it is very hard to get appointments in the Syston surgery already. There are no other services in the village and no scope to provide them. HS73 & HS67 - Broader objections Z70 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It wi	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and
	other settlements in the east of the borough where multiple small scale infill unfits could aggregately achieve government targets.	considered as the local plan progresses to the next stage.
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LDCLP/42 Chris Brazendale	 I would like to object to some of the proposals to the Local Plan as follows: HS73 - 47 houses in land off Gaddesby Lane 1. I live at the bottom of Gaddesby Lane and walk up there regularly. The visibility coming out of Gaddesby Lane, even as a pedestrian who can walk further round the corner to see better, is very poor/ dangerous. This has been born out by the fact that 2 people have died in the past in accidents crashing into my house or boundary wall. I don't believe that a mini roundabout would solve this problem. This was one of the reasons the bypass to the village was built, has this been forgotten so soon. Increasing traffic to this junction again would potentially bring more accidents, particularly as it is the only route to school for many. 2. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lanes as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, The Convent and Melton Road). 3. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 4. It does not conform to the objective of infilling. It is expansion. There is no potential for infilling along Melton Road. 5. The village school is small, only approximately 90 children. Even if there were only one child per household this number would be too large for the school to cope with. There is no doctors in the village, the doctor's surgery in East Goscote has just closed and it is very hard to get appointments in the Syston surgery already. There are no other services in the village and no scope to provide them. HS73 & HS67 - Broader o	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic
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	Additional proposed development on the fringe of the town will exacerbate this.	Landscaping / Open space within the proposed allocation.
	2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill unfits could aggregately achieve government targets.	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/43 Lucy Brazendale	I would like to object to some of the proposals to the Local Plan as follows: HS73 - 47 houses in land off Gaddesby Lane 1. I live at the bottom of Gaddesby Lane and walk up there regularly. The visibility coming out of Gaddesby Lane, even as a pedestrian who can walk further round the corner to see better, is very poor/ dangerous. This has been born out by the fact that 2 people have died in the past in accidents crashing into my house or boundary wall. I don't believe that a mini roundabout would solve this problem. This was one of the reasons the bypass to the village was built, has this been forgotten so soon. Increasing traffic to this junction again would potentially bring more accidents, particularly as it is the only route to school for many.	 The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the
	 The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lanes as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, 	'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	 New Avenue, The Convent and Melton Road). 3. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned down at Planning Appeal in 2018 on the grounds of unsustainability 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	within a small settlement with no local services.4. It does not conform to the objective of infilling. It is expansion.There is no potential for infilling along Melton Road.	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Plan. 6. The village school is small, only approximately 90 children. Even if there were only one child per household this number would be too large for the school to cope with. There is no doctors in the 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	village, the doctor's surgery in East Goscote has just closed and it is very hard to get appointments in the Syston surgery already. There are no other services in the village and no scope to provide them.	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is engaging with the Environment Agency to confirm flood
		zone mapping, and to confirm any further necessary assessment work.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 HS73 & HS67 - Broader objections 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 and, 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic flow into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. 2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small evaluation in the interval of the set of the borough where multiple small 	 The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/44 Mr G M Carter	 scale infill unfits could aggregately achieve government targets. Draft Charnwood Local Plan 2019-36 I would like to object to some of the proposals to the Local Plan as follows: HS73 - 47 houses in land off Gaddesby Lane 1. The visibility coming out of Gaddesby Lane, even as a pedestrian who can walk further round the corner to see better, is very poor/ dangerous. This has been born out by the fact that 2 people have died in the past in accidents crashing into the house opposite. I don't believe that a mini roundabout would solve this problem. This was one of the reasons the bypass to the village was built, has this been forgotten so soon. Increasing traffic to this junction again would potentially bring more accidents, particularly as it is the only route to school for many. 2. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10. houses. That upper limit was. founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, The Convent and Melton Road). 3. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 4. It does not conform to the objective of infilling. It is expansion. There is no potential for infilling along Melton Road. 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Plan. 6. The village school is small, only approximately 90 children. Even if there were only one child per household this number would be 	 The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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	too large for the school to cope with. There is no doctors in the village, the doctor's surgery in East Goscote has just closed and it is very hard to get appointments in the Syston surgery already. There are no other services in the village and no scope to provide	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	 HS73 & HS67 - Broader objections 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic flow into Syston, already a major problem. 	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic
	Additional proposed development on the fringe of the town will exacerbate this	Landscaping / Open space within the proposed allocation.
	2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill unfits could aggregately achieve government targets.	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/45 Miss Eleanor Metcalfe	Draft Charnwood Local Plan 2019-36 I would like to object to some of the proposals to the Local Plan as follows: HS73 - 47 houses in land off Gaddesby Lane 1. The visibility coming out of Gaddesby Lane, even as a pedestrian who can walk further round the corner to see better, is	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.
	very poor/ dangerous. This has been born out by the fact that 2 people have died in the past in accidents crashing into the house opposite. I don't believe that a mini roundabout would solve this	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.
	 problem. This was one of the reasons the bypass to the village was built, has this been forgotten so soon. Increasing traffic to this junction again would potentially bring more accidents, particularly as it is the only route to school for many. 2. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10. houses. That upper limit was. founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, The 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Convent and Melton Road). 3. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned down at Planning Appeal in 2018 on the grounds of unsustainability	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	within a small settlement with no local services.	Further transport modelling work is being carried out, and the feedback

OFFICER RESPONSE
and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage. The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy op
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RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	identified Gaddesby Lanes as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, The Convent and Melton Road).	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	4. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	 down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 5. It does not conform to the objective of infilling. It is expansion. There is no potential for infilling along Melton Road. 6. It removes part of the proposed extension to the area of local 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	 separation set out in the Rearsby Plan. 7. The village school is small, only approximately 90 children. Even if there were only one child per household this number would 	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	be too large for the school to cope with. There is no doctors in the village, the doctor's surgery in East Goscote has just closed and it is very hard to get appointments in the Syston surgery already. There are no other services in the village and no scope to provide them.	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
	HS73 & HS67 - Broader objections 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and	The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
	increase traffic flow into Syston, already a major problem.Additional proposed development on the fringe of the town will exacerbate this.2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
	other settlements in the east of the borough where multiple small scale infill unfits could aggregately achieve government targets.	
LDCLP/47 Virginia & James	Draft Charnwood Local Plan 2019-36 I would like to object to some of the proposals to the Local Plan as	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the
Toone	follows: HS73 - 47 houses in land off Gaddesby Lane 1. The visibility coming out of Gaddesby Lane, even as a pedestrian who can walk further round the corner to see better, is	Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.
	very poor/ dangerous. This has been born out by the fact that 2 people have died in the past in accidents crashing into the house opposite. I don't believe that a mini roundabout would solve this	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
CONSULTEE	 problem. This was one of the reasons the bypass to the village was built, has this been forgotten so soon. Increasing traffic to this junction again would potentially bring more accidents, particularly as it is the only route to school for many. 2. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10. houses. That upper limit was. founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones, New Avenue, The Convent and Melton Road). 3. 47 houses is clearly much higher than the amount referred to at point 1. It is more like the number of houses proposed by the Jelson Homes development, off Melton Road, that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 4. It does not conform to the objective of infilling. It is expansion. There is no potential for infilling along Melton Road. 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Plan. 6. The village school is small, only approximately 90 children. Even if there were only one child per household this number would be too large for the school to cope with. There is no doctors in the village, the doctor's surgery in East Goscote has just closed and it is very hard to get appointments in the Syston surgery already. There are no other services in the village and no scope to provide them. HS73 & HS67 - Broader objections 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic flow into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate t	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part
	for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill unfits could aggregately achieve government targets.	of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/48	My objections are as follows:-	The Council acknowledges the work done by the community to progress
Mrs Irene	HS73 - 47 houses in land off Gaddesby Lane	the Neighbourhood Plan. The Pre-Submission Draft of the
Bodicoat	1. The Rearsby Neighbourhood Plan, under exception site rules,	Neighbourhood Plan was submitted for comment in February 2019.
Boulcoal	1. The Rearsby Neighbourhood Plan, under exception site rules,	Neighbourhood Flah was submitted for confinent in February 2019.

RESPONSE NO/	REPRESENTATION SUMMARY	OFFICER RESPONSE
CONSULTEE	Identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones; New Avenue; Covent; Melton Road). 2. The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 3. It would greatly increase traffic flow at the Gaddesby Lane/Melton Road crossroads. his has a long history as an accident black spot due to complete lack of visibility to the right for vehicles leaving Gaddesby Lane. 4. It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road. 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan. HS73 & HS67 - Broader objections 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 & 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic flow into Syston, which is already a major problem. Additional proposed development on the fringe of the town will exacerbate this. 2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton on the Wolds, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. 3. Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited by virtue of its location on the A46 for the development of a n	 However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
		A proposal for a development site at Six Hills has been submitted as part

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
		of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/49 John Parker	My objections are as follows:- HS73 - 47 houses in land off Gaddesby Lane 1. The Rearsby Neighbourhood Plan, under exception site rules,	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019.
	identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made	However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.
	to housing stock in previous years (Bluestones; New Avenue; Covent; Melton Road). 2. The figure of 47 massively and unrealistically inflates this. It	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.
	closely approaches that of Jelson for development off Melton Road that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and
	3. It would greatly increase traffic flow at the Gaddesby Lane/Melton Road crossroads. his has a long history as an accident black spot due to complete lack of visibility to the right for vehicles leaving Gaddesby Lane.	spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive
	4. It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road.	effects.
	 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan. HS73 & HS67 - Broader objections 1. 270 house proposed over half a mile in Decreby and Fact. 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 & 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	 Additional proposed development on the fringe of the town will exacerbate this. It is also disproportionate. No extension of housing is proposed 	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	for Thrussington, Seagrave, Burton on the Wolds, Walton, Wymeswold, Hoton or other settlements in the east of the borough	The impact of the development in terms of infrastructure requirements
	where multiple small scale infill units could aggregately achieve government targets.	has been considered as part of the IDP and site selection assessment.
	3. Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmotic groop areas of separation, a more far sighted plan pools	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work.
	cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited by virtue of its location on the A46 for the development of a new town	The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work.
	that would take the pressure off of the corridors northwards out of 704	The Area of Local Separation (ALS) is reinforced through Draft Local

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	Leicester and the gathering tendency to conurbation development between Leicester and Loughborough.	Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
		A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
LDCLP/56 T. Woody	Charnwood Local Plan in respect of the proposed land for housing off Gaddesby Lane Rearsby HS73 The Rearsby Neighbourhood Plan has been prepared and the process carried out over a long period and under exception site rules identified Gaddesby Lane as a potential site for some small ribbon development. The upper limit of 10 houses was founded on the small size of the village and the significant contribution made to	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.
	previous housing stock eg Bluestones, New Avenue, Convent, Melton Road. The new figure of 47 dwellings inflates this number dramatically. The development on Melton Road Rearsby was turned down at appeal in 2018 on the grounds of unsustainability within a small settlement with no local service with a similar number of homes. The traffic flow on Gaddesby Lane would increase and the junction with Melton Road has a long history as an accident black spot due to a lack of visibility to the right for vehicles leaving Gaddesby Lane even after the pavement was moved forward and the Give Way	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	lines moved. It is expansion of the village not conforming to the objective of infilling. There are still sites in Rearsby that are suitable for infill off Melton Road and Station Road.	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan. There is no proposed extension of housing for Thrussington, Seagrave, Burton, Wymeswold, Hoton or other settlements in the	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	east of the Borough where small scale infill units could aggregately achieve Government targets. Instead of proposing the extension of the Leicester urban area along the Melton Road corridor, broken by minimal cosmetic green areas, a far more original sighted plan could be developed. The	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	area near to the A46 for a new village would take pressure off the corridors northwards out of Leicester. Currently there are many severe hold ups on the roads by East	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	Goscote. Recently other housing developments in the East	The Council is engaging with the Environment Agency to confirm flood

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	Goscote area at appeal have been refused.	 zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and
LDCLP/58 Mr and Mrs Beeson	 HS73- 47 houses in land off Gaddesby Lane. 1. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones; New Avenue; Covent; Melton Road). 2. The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 3. It would greatly increase traffic flow at the Gaddesby Lane-Melton Road crossroads. This has a long history as an accident black spot due to complete lack of visibility to the right for vehicles leaving Gaddesby Lane. 4. It does not conform to the objective of infilling. It is expansion. There is potential for infilling along Melton Road. 	 considered as the local plan progresses to the next stage. The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan HS73 & HS67: BROADER OBJECTIONS. 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate 	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response
	 this. 2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or 706 	will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.

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	other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets.3. Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and the gathering tendency to conurbation development between Leicester and Loughborough.	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part
		of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
EDCLP/62 Mrs V Hewitt	Site HS73 Rearsby for 47 houses This will result in approximately 200 car movements. The Rearsby bypass was built to move traffic out of the village. This is increasing the traffic once again. The access will be onto the junction where a fatal accident occurred.	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	There is no cycle lane between Rearsby and Goscote. There are already accidents with cyclists on the road, further traffic will cause more injury.	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
		The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
EDCLP/72 J. Bray	In relation to Q8a: Rearsby Neighbourhood Plan, which is at regulation stage 14, has already addressed the issue of new housing and has identified that up to 10 houses on Gaddesby Lane are sufficient (under exception site rules) for this small village. A planning appeal in 2018 identified that the proposed development of 66 houses was too large to sustain so why, only a year later, 47	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.
	houses have been proposed is beyond me. There are over 400 houses proposed in the local area and a village of this size simply cannot sustain this level of development. The local amenities are not substantial enough to support it and surely,	The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation.
	this must be taken into consideration. This particular vision within the local plan is just not realistic.	This site has been assessed in the SHLAA, and through the SA.
		Evidence will be reviewed in light of this representation, along with the

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		reasons for refusal on the previous application.
EDCLP/73 Janey Brown	Q8a: In relation to the proposed 47 houses off Gaddesby Lane in Rearsby - I believe this level of development is totally unrealistic. I was under the impression that the Rearsby Neighbourhood Plan has identified that up to 10 houses on this site was appropriate? Why have such neighbourhood plans if they are totally disregarded? Is this not a waste of someone's time and effort? Rearsby is a small village that simply cannot sustain this level of development with the local amenities that are available. There are over 400 houses identified for development within a one mile area which seems totally ridiculous to say East Goscote and Rearsby are so small. I would be elated to find some more affordable housing in the Rearsby area as this is exactly what I am in the market for but to crowd Rearsby with that level of development would be a shortsighted and reactive decision. My view is that the RNP should be adhered to.	 The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. The new draft local plan must objectively consider all potential sites that are either nominated via the Call for Sites process, or emerge through consultation. This site has been assessed in the SHLAA, and through the SA.
EDCLP/80 Historic England	There is the potential for cumulative impact / impact upon the historic core, potentially also taking into account development proposed at East Goscote [HS67]. There are potential views across the proposed allocation site to and from the Grade II* Church of St Michael. As such, given the surrounding built form and topography, development should be limited to two storeys if following further assessment the allocation is taken forwards.	Matters of heritage and impacts on the historic environment have been considered during the site assessment process as part of the SHLAA. These matters have also been considered as part of the SA process. The evidence in this response will be used to inform further site assessment work. The Council welcomes the opportunity to engage with HE to discuss site constraints.
EDCLP/94 Mr J Finnemore	 HS73 - 47 houses in land off Gaddesby Lane. 1. The Rearsby Neighbourhood Plan, under exception site rules, identified Gaddesby Lane as a potential site for ribbon development of no more than 10 houses. That upper limit was founded on the small size of the village and the very significant contribution made to housing stock in previous years (Bluestones; New Avenue; Covent; Melton Road). 2. The figure of 47 massively and unrealistically inflates this. It closely approaches that of Jelson for development off Melton Road that was turned down at Planning Appeal in 2018 on the grounds of unsustainability within a small settlement with no local services. 3. It would greatly increase traffic flow at the Gaddesby Lane - Melton Road crossroads. This has a long history as an accident black spot due to complete lack of visibility to the right for vehicles leaving Gaddesby Lane. 4. It does not conform to the objective of infilling. It is expansion. 	 The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight. Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application. The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive

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	 There is potential for infilling along Melton Road. 5. It removes part of the proposed extension to the area of local separation set out in the Rearsby Village Plan HS73 & HS67: BROADER OBJECTIONS. 1. 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS 71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will massively outstrip the potential of local services and increase traffic low into Syston, already a major problem. Additional proposed development on the fringe of the town will exacerbate this. 2. It is also disproportionate. No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Hoton or other settlements in the east of the borough where multiple small scale infill units could aggregately achieve government targets. 3. Instead of proposing the further extension of the Leicester urban area along the Melton Road corridor, broken only by minimal cosmetic green areas of separation, a more far sighted plan needs to be developed. The blank area of Six Hills is ideally suited, by virtue of its location on the A46, for the development of a new town that would take the pressure off of the corridors northwards out of Leicester and Loughborough. 	effects. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation. A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
EDCLP/110 Paul Matts	I have heard there is a proposal for 47 new dwellings to be built on Gaddesby Lane in Rearsby. Also, a further 223 dwellings about half a mile away on Melton Road, East Goscote. Both villages, in particular Rearsby, suffer heavily from flooding. To take away further green fields would accentuate this problem. There would be less soil to absorb rain water. Once a field is gone it is gone for ever. Building these properties is irresponsible on the grounds of environmental issues. Flooding is a countywide problem, which outs strains on Charnwood Borough Council in dealing with it. Building these dwellings would increase the burden	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is aware of the potential transport impacts associated with

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	on yourselves. Furthermore, the amenities, in terms of local schools and doctors, cannot support any more inhabitants. The school in Rearsby is already over capacity, as, I understand, is East Goscote's Broomfield school. Rearsby has one local shop. There are no doctors surgeries any more. The proposed building is irresponsible on service grounds. Traffic would increase by at least 600 cars, at an estimate. These vehicles would travel along an already busy Melton Road (A607). It is already dangerous, and the state of the roads in the area is poor. To build these properties is irresponsible on transport grounds. I therefore protest in the strongest possible terms against the building of any of these properties. Village life is already heavily eroded and the villages of East Goscote and Rearsby are almost joined together now. Identity is disappearing fast. The area has already has more than its share of new-builds, with Rearsby Roses (Melton Road), Bloor Homes (again, Rearsby) having popped up within the past five years. Please, no more. The area is being choked and destroyed.	 new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
	I appeal to your responsible nature. Please do not allow any of these dwellings to be built.	
EDCLP/142 Jonathan Proctor	 I would like to object to some of the proposals to the Local Plan as follows:- HS73 - 47 houses in land off Gaddesby Lane 1. Vehicle and pedestrian access from Gadesby Lane onto Melton Road. a Limited visibility leaving Gaddesby Lane to join 	The Council acknowledges the work done by the community to progress the Neighbourhood Plan. The Pre-Submission Draft of the Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.
	Melton Road for both vehicles and pedestrians. b The junction has been the scene of fatal vehicle accidents. c Data from the speed sign has shown excessive	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.
	 c Data from the speed sign has shown excessive vehicle speeds through the village of Rearsby. 2. Rearsby Neighbourhood Plan a Gaddesby Lane identified as a potential site for 10 houses in a ribbon development. b The ten house limit being consistent the small size of the village and the very significant contribution (relative to the village's size) made to housing stock in previous years (Bluestones, New Avenue, The Convent and 	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Melton Road). c The proposed development is within the proposed extension to the area of local separation	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the

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	 d Proposed development does not conform to the objective of infilling. It is expansion. 3. Sustainability a Jelson Homes rejected development, off Melton Road was rejected at Planning Appeal in 2018 on grounds of unsustainability within a small settlement with limited local services. b The Rearsby school is small, approximately 90 children. Allowing for just 20 more children would require a significant expansion of the school. c There is no doctors' surgery in Rearsby. d There is no post office or bank. HS73 & HS67 - Broader objections 270 houses proposed over half a mile in Rearsby and East Goscote (425 in less than 2 miles when HS71 and 72 are included) is an excessive burden to place on the Melton Road corridor out of Syston. It will outstrip the potential of local services and increase already problematic traffic flow into Syston. Village character is better maintained by promoting multiple, small scale, infill developments spread across the villages. a It is disproportionate to load one area with a significant new development. b No extension of housing is proposed for Thrussington, Seagrave, Burton, Walton, Wymeswold, Horton or other settlements in the east of the borough. 	 preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
DCLP-264 LCC - Education	Primary (St Michaels and All Angels CofE Primary) The school is on a confined site and unable to expand without additional land. However, East Goscote Broomfield maybe in walking distance and has potential to expand. Secondary (Wreake Valley) Sufficient places at Wreake Valley however, developments for secondary places at Thorpebury (North East of Leicester) may have an effect.	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment. The Council welcomes LCC's further input to ensure that the impacts from potential development are fully understood. This is particularly important for education capacity and requirements. The Council will liaise with LCC on education matters in finalising the IDP.
EDCLP/ 244 Fisher German obo Rearsby Trust	HS 73 - The proposed allocation off Gaddesby Lane, Rearsby (HS73) is supported. As illustrated on the accompanying indicative masterplan (reproduced below), the site could deliver approximately 47 dwellings.	Council welcomes the support and the additional evidence provided. This will be analysed and used (where appropriate) to inform further site assessment work. The Council acknowledges the additional analysis provided against the SA criteria. This will be considered, however, the Council stresses that

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The site is within walking distance of services and facilities in the village as well as employment opportunities at Rearsby Business Park to the east. The site is Suitable, Available and Achievable: • *Suitable* – There are no known irresolvable physical/environmental constraints preventing development of the land off Gaddesby Lane, Rearsby. The site is in a suitable location for development directly adjacent to a village with a good range of services and facilities. Access to the site can be achieved without constraint from Gaddesby Lane.

• *Available* – The site is privately owned. The landowner is committed to the delivery of the site and is able to continue to promote the site and bring forward a planning application at the most appropriate point in time. There is strong developer interest in the site.

• Achievable – The site can be delivered within 5 years. There are no irresolvable market factors affecting the development of the site, indeed, there is developer interest in the site. There are no irresolvable cost factors affecting the development of the site, nor are there any irresolvable delivery factors affecting development.

The assessment of the site within the Interim Sustainability Appraisal Report, October 2019 (Table 6.9) is generally supported. Further detail against each criterion is provided below which has been informed by additional site-specific reports including a Landscape Technical Note and Access Appraisal; amended scoring is proposed where appropriate.

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the SA process is an objective appraisal of both strategy and sites.

The Council acknowledges the indicative access point, shown off Gaddesby Lane. The Council will use this information in the Transport Modelling and Sustainable Transport Study work.

The Council would welcome further engagement with the landowner/promoter/developer where needed.

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	Water Pollution Protect and improve the quality and quantity of the water in the Borough's surface and groundwaters	Not within groundwater protection zones, not within 50m of watercourse.	Agree scoring - Neutral offects likely	
	Water Quality: Nitrates	The site is in active agricultural use within Nitrate vulnerable zone	Agree scoring	
	Flood Risk Reduce the risk of flooding to existing communities and ensure no new developments are at risk.	The site is within Flood Zone 1. A Flood Risk and Drainage Assessment and Detailed Drainage Strategy will be prepared and submitted with any future planning application.	Agree scoring - neutral effect	
	Land and Soll Protect the Borough's soll resources.	Natural England's online mapping identifies the site as Grade 3 agricultural land.	Agree scoring	
	Air Quality Improve local air quality	The site is not within an AQMA.	Agree scoring - neutral effect	
	Access to Public Transport	The nearest bus stops to the site are located on Melton Road, approximately 425 metres from the centre of the site. These stops are served by the number 5, 5A and X5 bus services which provide a good bus service for residents to travel between Melton Mowbray and Leicester for work, education and/or leisure Monday to Saturday. Further detail in respect of the accessibility of the site is included within the attached Access Appraisal. The Access Appraisal also considers how the site will be accessed and confirms that there are no reasons why the proposals should be resisted on traffic or transportation grounds.	Agree scoring	
	Wind Energy	Policies Map 2, in the emerging Local Plan identifies pockets of land beyond the build form of Rearsby as suitable wind and solar energy locations. The site is not however identified for this use.	Having regard to Policies Map 2 in the emerging Plan it is considered that the score should be amended to neutral effect	

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	Historic Environment Conserve and enhance the historic environment, heritage assets and their settings.	The site does not lie in close proximity to any designated heritage assets or their settings.	Agree scoring – neutral effect	
	Regeneration Reduce poverty and deprivation		Agree scoring – neutral effect	
	Local Green Space	Formal existing Local Green Space is within 700 metres of the site. The development of the site offers the opportunity to create new public open space. The site is located immediately adjacent to a Public Right of Way (PRoW) providing direct access to the countryside and a wider PRoW network.	It is considered that the site should be rescored to reflect its proximity to informal opportunities and therefore Within 400m of open space.	
	Access to Healthcare	The site is within 400 metres of a bus stop proving access to the GP surgery in East Goscote (approximately 1.6km from the site). The GP surgery could also be accessed via waking or cycling.	Agree scoring	
	Housing	The site will make a valuable contribution to Charnwood's housing supply within 5 years. As set out in response to Question 6 of the consultation document, sites of a scale such as H873 Gaddesby Lane, Rearsby attract a range of housebuilders and can, from planning being granted, be built out within two years, immediately making a positive contribution to the Councils housing land supply.	It is considered that the score should be amended to reflect the contribution it will make to Charmwood's housing land supply within 5 years	
	Employment Land	The site scoring against the criteria is supported – the development proposes the delivery of housing on non- employment land and therefore warrants a neutral score. The scoring criteria does not however have regard to the proximity of the site to employment opportunities; a key component of the sustainability of a site. The site at Gaddesby Lane, Rearsby is within 600 metres of Rearsby Business Park and approximately 2 km from East Goscote's industrial estate. It is considered that the site should be rescored to reflect this as a positive effect.	The site should be reacored from neutral effect to a likely positive effect in order to reflect its proximity to employment opportunities.	

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Proximity to Key Routes	It is noted that only employment sites can achieve a positive rating under this SA objective.	Agree scoring
Primary School	St Michael and All Angels Primary School is located within 720 metres from the centre of the site.	Agree scoring
Secondary School	The nearest Secondary School is approximately 2.6km from the site. The site score is agreed.	Agree scoring
Convenience Store	The site is over 1,200 metres to a food shop/supermarket. The scoring is agreed.	Agree scoring
Leisure Access to Leisure facilities (allotments, childrens play areas, libraries, community centres, sports facilities, public house)	The site is within 800 metres of 4 or more facilities. Formal existing Local Green Space is within 700 metres of the site. The development of the site offers the opportunity to create new public open space. The site is located immediately adjacent to a Public Right of Way (PRoW) providing direct access to the countryside and a wider PRoW network. There is a public house within 430 metres of the site and a restaurant within 500 metres. A tearoom with shop is approximately 540 metres from the site, and the village hall is 650 metres from the centre of the site.	Agree scoring
Minerals	1	Agree scoring

	SA Objective	Fisher German Comment	Score	
	Landscape	Development on this site can be sensitively accommodated	Having regard to	
	Protect and enhance the	within the landscape.	the additional site-	
	integrity and quality of the Borough's urban and	A Landscape and Visual Appraisal (LVA) has been prepared	specific evidence which has been	
	rural landscapes.	for the site and confirms that the site is not a valued	prepared it is	
	maintaining local	landscape having regard for para 170 of the Framework and		
	distinctiveness and sense	that "the site and its immediate setting is of low landscape	scoring should be	
	of place	value". Moreover, the susceptibility of the site to new	amended to low	
		development is also low. The LVA concludes that "the	sensitivity	
		Site has the capacity to accommodate a sensitively		
		designed residential development which would not give rise to significant landscape or visual effects'		
		to any minute minute of the air officers		
		These representations are also supported by an indicative		
		masterplan which illustrates how the site can be sensitively		
		assimilated within the landscape.		
	Biodiversity	The site is currently within agricultural use with limited	Agree scoring	
	Protect and enhance	biodiversity. Opportunities exist to enhance biodiversity on		
	biodiversity, habitats and			
	species	Any future planning application will be accompanied by		
		detailed ecological surveys which will identify the habitats		
		present onsite and recommend measures that will maintain and enhance existing features of biodiversity value (such as		
		trees and hedgerows).		
EDCLP/196 Mark	I would like to exp	press some concerns regarding b	ooth HS73 &	The Council acknowledges the work done by the community to progress
Richardson	HS67:			the Neighbourhood Plan. The Pre-Submission Draft of the

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	HS73 - 47 new houses on land off Gaddesby Lane, Rearsby. I can only assume that no-one in the Planning Department lives in Rearsby, or has even been to Gaddesby Lane in Rearsby. The	Neighbourhood Plan was submitted for comment in February 2019. However, at time of writing, the proposals in the Neighbourhood Plan do not carry any statutory weight.
	junction of Gaddesby Lane and Melton Road is already a dangerous junction with a long history of accidents, so why would you even contemplate significantly increasing the amount of traffic	Evidence will be reviewed in light of this representation, along with the reasons for refusal on the previous application.
	through this junction ? The Rearsby Neighbourhood Plan identified the top of Gaddesby Lane as a potential for 'ribbon development of no more than 10 houses' - so where on earth did 47 come from ? The village has no facilities other than 2 pubs, 1 tearoom and a very small school - so adding 47 houses could equate to over 100	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional
	additional residents - where will their children go to school as Rearsby is already full ? Rearsby has suffered badly from flooding recently, so adding 47 houses adds yet more hard standing and removes yet more land to soak up the rainfall. The drains on	dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects.
	Gaddesby Lane are struggling now to cope with the excessive amounts of water being received, so adding more housing is only going to exacerbate the flooding issue. Furthermore, this does not conform to the stated objective of 'infilling', which is crucial to maintaining the identity of a small village community. In the Draft	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	Plan, you talk about sustainability as being one of the key principles - yet this proposal is totally unsustainable - throwing another 100+ residents into a small village with almost no local services.	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.
	HS67 - 225 houses off Melton Road, East Goscote. Why would you even consider this proposal ? There is a minimal amount of local services in East Goscote - no doctors surgery, only 3 or 4 shops, and a school which could not cope with 100 more children, let	The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
	alone 200-300 more. The A607 traffic island is already busy, and is regularly jammed solid on a morning with traffic backing up from the A46 and down the East Goscote bypass. This traffic in turn	The impact of the development in terms of infrastructure requirements has been considered as part of the IDP and site selection assessment.
	backs up into Queniborough and East Goscote, so throwing another 200 + vehicles into this scenario every morning will only add further misery to commuters daily journeys.	The Council is engaging with the Environment Agency to confirm flood zone mapping, and to confirm any further necessary assessment work. The Council is preparing an SFRA (including sequential and exceptions test, and cumulative assessment). This response will help inform that
	Why is the council obsessed with filling in the Melton Road corridor ? Why not look at infill developments in other villages which could help to spread the impact of the new housing requirement ? If you include HS 71 and HS 72, it suggests over 400 houses could be	work. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic
	located within a 2 mile area - an area which is already struggling with traffic and flooding, and which has minimal or no local	Landscaping / Open space within the proposed allocation.

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	services. Yet there are no housing developments planned for Seagrave, Thrussington, Burton, Walton, etc - some of which already have more local services than Rearsby & East Goscote ! I know we have to have more new houses to satisfy the likely requirements, but surely these are better done via whole new communities where the local services can also be built, and by small infill developments on the edge of all local villages, and not just by overloading certain villages.	A proposal for a development site at Six Hills has been submitted as part of the draft local plan consultation. This site will be appraised and considered as the local plan progresses to the next stage.
EDCLP/177 Sue Green House Builders Federation	 Draft Policy LP3 – Housing Sites identifies 73 sites for allocation for housing following a process informed by the preferred strategy and sustainability appraisal. The HBF submit no comments on the merits or otherwise of individual strategic / non-strategic sites proposed for allocation. It is noted that there is no housing trajectory. This omission from the Local Plan is inconsistent with the 2019 NPPF. A housing trajectory should be incorporated together with supporting evidence justifying the Council's assumptions on lapse rates, windfall allowances, lead in times and delivery rates in the housing trajectory. 	The Council will provide a housing trajectory as part of the next version of the local plan.
EDCLP/252 Leicestershire County Council	 The scattered and relatively small-scale nature of the development locations around the borough means that it will be especially important for the local plan to have strong policies around the identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives. In locations where there are clusters of allocated sites in proximity (e.g. Syston, Shepshed), proposals should be taken forward in a comprehensively master-planned approach, which reflects any existing development proposals (including as relevant in neighbouring authorities) and other growth options with which this might interact, and establishes the overall package of infrastructure measures (highways, transportation and otherwise) required to enable the growth and the approach to delivery/funding. There could be cross- boundary implications that would need to be considered, for example impacts on roads for which Leicester City Council is the highway authority. In the context of comprehensive scale housing sites through allocation HS5 (Land at Gynsill Lane and Anstey Lane, 	 The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery. The Council looks forward to liaising and directly working with LCC to ensure that the transport assessments and modelling take account of the direct, indirect, cumulatively, and in-combination impacts of proposed development on the transport network. Similarly, the Council welcomes further discussion with LCC, and all the other partners involved in the SGP, to establish how strategic, subregional scale infrastructure is delivered.

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	 Glenfield) is not especially helpful in transport terms, particularly in the context of potential adjoining growth opportunities in Leicester City and Blaby District. The CHA would prefer to see coordinated, joint working between the three authorities to deliver a single, comprehensively master planned development in this area. Whilst sites HS43 and HS44 are allocated as part of the growth proposed for Shepshed, they do not adjoin the wider urban area and are therefore likely to be relatively isolated from the town in transport terms, and more challenging to provide good quality sustainable travel connections to and from. The Local Plan will need to have strong policies in place to overcome this. Development within the "south east Charnwood" area (i.e. Syston, East Goscote etc.) should have due regard to the potential longerterm strategic growth and transport infrastructure requirements for this area as part of the Strategic Growth Plan's "A46 Priority Growth Corridor". Particular consideration may be required in relation to proposed allocation sites HS8, HS9, HS11 and HS67 within the draft Local Plan. 	
DCLP/261 Edward Argar MP	Similar objections exist for proposals for 47 off Gaddesby Lane in Rearsby (HS73) [it would further eat away at the areas of separation between villages in the area, undermining their particular individual character, and running counter to other proposed policies in the Local Plan to protect the character of villages/ towns and maintain separation between settlements]. In each of these cases the scale of the proposed development would, I believe, risk significantly altering the character of the existing village of itself, as well as running the risk of eroding the separation and separate unique identities of the village. This is quite apart from broader concerns about the impact of additional pressures on local infrastructure arising from development of such a scale. While I believe overall in its thrust the Plan is a sound basis for future planning, I strongly believe that the above proposals are not the most appropriate way to proceed.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The SA considered and appraised a series of housing growth options and spatial strategy options. The Second Interim SA Report notes that the 'Hybrid' option (with a spatial strategy that apportions 800 additional dwelling to 'Other Settlement') is the spatial strategy option that has the fewest significant negative effects, and the greatest significant positive effects. The Area of Local Separation (ALS) is reinforced through Draft Local Plan Policy LP19, with ALS8 (Rearsby/East Goscote) maintained. Furthermore, the site at HS67 includes the principle of Strategic Landscaping / Open space within the proposed allocation.
EDCLP/252 Leicestershire County Council	Land off Gaddesby Lane, Rearsby (47 dwellings): The site has no direct vehicular access onto the A607 Rearsby Bypass, and is only connected by Bridleway 116.	The site appears to have a potential access through a turning head off Gaddesby Lane. Further discussion is required with LCC to confirm potential access arrangements.
Q8 - LP3 - Housing Specific Sites – H	g Sites S68 to HS72 (Other Settlements)	

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CONSULTEE	arious Hathern Sites	
EDCLP/166 Roy G Dann Hathern Parish Council	 Hathern Parish Council totally rejects the suitability of the sites in Hathern (HS68,69,70) proposed in this plan. The small community of Hathern has been the subject of over development in recent years with more than 200 new houses built across 3 estates increasing the size of the village by nearly 25%. Public services in the village have not kept pace with the increasing population - there are insufficient places in the village primary school and new residents cannot register at the local GP surgery as patient lists are closed. We have the ludicrous situation whereby housing development has planning approval on the basis that the community already has education and health services but when people move in they find that they cannot access those services. Furthermore we have the impending huge development that is the Garendon estate being built partly on land that was part of Hathern Civil Parish and therefore right on our door step, and the Dishley Business Park to be build adjacent to the village and also within the Parish. These two significant developments will put further strain on the infrastructure serving the village – not least traffic through and into the village. The Parish Council is therefore concerned that even more development will be to the detriment of the current community, its local services, and transport routes. Therefore we reject the suitability of Hathern as a location for the developments proposed in this plan. As a final point the Parish Council notes the distinct lack of any development proposals for Wymeswold or indeed any of the Wolds communities. Surely that cannot be right as these areas are extremely poorly served by the availability of affordable homes. 	Education and healthcare provision are vital infrastructure requirements and the comments are noted. The Council is in on-going discussions with the Local Education Authority and Clinical Commissioning Group to identify issues with education and healthcare provision and how this can be addressed by new development. The site selection process has been informed by transport modelling and further more detailed transport assessments will be undertaken as the local plan progresses. Further infrastructure evidence will also be prepared to inform the draft local plan included an Infrastructure delivery schedule. The site selection process has been informed by a wide range of evidence including a Sustainability Appraisal to identify the most suitable locations for development including the sites in Hathern. Further evidence will be undertaken as the plan progresses including a Housing Needs Assessment to understand the types of homes needed and in which locations.
HS68 DCLP-264 LCC - Education	 Primary (Hathern CofE Primary) "• School site currently has 210 pupils and cannot expand due to flood risk issues so additional provision is problematic. • New schools on Garendon development may be within walking distance however timing may be an issue Secondary (Loughborough Secondary Schools) "Capacity and scope to expand schools in Loughborough area 	Education provision is an important component of sustainable development and we are in on-going dialogue with LCCs education department. Site selection process has been informed by a strategic flood risk assessment and further more detailed flood risk evidence is also been undertaken.
	719	We will prepare delivery evidence which will inform the phasing and

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		delivery of housing developments and associated infrastructure including education.
EDCLP/252 Leicestershire County Council	Land rear of 89 Loughborough Road, Hathern (35 dwellings): The site connects to A6 Loughborough Road in two locations between existing dwellings. These routes into the site would appear to be sub-standard in terms of geometry and potential visibility thus this would need to be considered in any proposal.	Concerns over access to the site are noted. Access arrangements will be set out in more detail through the development management process where geometry and visibility issues will be considered.
EDCLP/258 Sam Heaton Heaton Planning on behalf of Swithland Homes Ltd	Swithland Homes (herein referred to as the Company) is a privately-owned house builder specialising in offering high-quality residential developments. The Company were established in 2014 and are based in Birstall, Leicestershire. The company has various land interests across the Borough and East Midlands region, and are continuing to grow, with the aim of delivering further bespoke residential solutions for a range of sites. The Company are able to build out multiple sites concurrently and have a range of land interests which are focused predominantly in and around Charnwood Borough. The Company specialise in the development of small to medium sized sites. It is considered by Swithland Homes that within the plan period the Company will be able to significantly increase their capacity and will be able to contribute greatly to the delivery of residential development across Charnwood through a steady supply of new dwellings. Site location plans for each of Swithland Homes' land interests is appended to the below representations. To summarise, this includes the following: • Loughborough Road, Hathern; Draft Charnwood Local Plan 2019-2036 These representations provide a direct response to the relevant questions, proposed policies and allocations in the Preferred Options Draft Charnwood Local Plan specifically relating to housing delivery. The below comments are informed by previous submissions to the Issues and Options representations submitted by Heatons in June 2018. The National Planning Policy Framework (NPPF, February 2019)	Comments are noted. The site selection process has been informed by a wide range of evidence including sustainability appraisal, landscape and transport evidence. The site at Loughborough Road Hathern is included in the list of housing sites in the draft Local Plan. Further evidence is being prepared to review and refine the list of housing sites and we will continue on-going liaison with the site promoter and land owner.
	states that plans should be prepared positively, in a way that is	

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	 aspirational but deliverable (Paragraph 16). The below is framed against the tests of soundness identified at Paragraph 35 of the NPPF, which states Plans are 'sound' if they are: Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. Justified – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence; Effective – deliverable over the plan period; Consistent with national policy – enabling the delivery of sustainable development. 	
	Site location plans for each of Swithland Homes' land interests is appended to the below representations [PDFs supplied]. To summarise, this includes the following: • Loughborough Road, Hathern;	
	As submitted previously, the above-mentioned sites have been submitted for inclusion within the latest Strategic Housing & Employment Land Availability Assessment and to inform further discussions regarding the potential inclusion of each site for residential development within the emerging Local Plan.	
	Conclusion Our client's sites represent sustainable locations to assist in meeting the housing need in Charnwood in such a manner which would be in keeping with the localised landscape and visual character of each area. Each site is available and realistically achievable to deliver housing developments at appropriate densities.	
	Heatons will continue to monitor the emerging Local Plan and we understand a date for the next stage of consultation is yet to be confirmed. We would welcome an opportunity to meet with officers of the local planning authority to discuss our client's land interests and how the delivery of these sites will positively contribute to a stable supply of new homes across the plan period. Should you require any further clarification please do not hesitate to contact	
HS69	me.	
DCLP-264 LCC-Education	Primary (Hathern CofE Primary) "• School site currently has 210 pupils and cannot expand due	Education provision is an important component of sustainable development and we are in on-going dialogue with LCCs education

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	 to flood risk issues so additional provision is problematic. New schools on Garednon development may be within walking distance however timing may be an issue Sceondary (Loughborough Secondary Schools) "Capacity and scope to expand schools in Loughborough area 	 department. Site selection process has been informed by a strategic flood risk assessment and further more detailed flood risk evidence is also been undertaken. We will prepare delivery evidence which will inform the phasing and delivery of housing developments and associated infrastructure including
EDCLP/252 Leicestershire County Council	Land off Zouch Road, Hathern (50 dwellings): The site is located on the A6006 Zouch Road (60mph); any proposed new access on the A6006 may be restricted by policy IN5 of the LHDG. The site is adjacent (within 150m) to the A6 part of the County's proposed Major Road Network between Loughborough and Kegworth, and then subsequently to the Strategic Road Network (M1, A50 and A42); this will need to be reflected / considered in any transport assessment work.	education. Concerns over access to the site are noted. Access arrangements and compliance with relevant policies will be set out in more detail through the development management process where geometry and visibility issues will be considered.
EDCLP/71 William Davis Ltd	REF: DRAFT CHARNWOOD LOCAL PLAN (2019 – 36) PREFERRED OPTIONS: PROPOSED ALLOCATION OF LAND OFF ZOUCH ROAD (HS69) I refer to the above consultation document. Please accept this as a formal response to the Draft Local Plan (DLP) on behalf of William Davis Limited (WDL) in relation to the preferred option allocation HS69: Land off Zouch Road, Hathern. WDL support the proposed future allocation of the site for residential development and can confirm its deliverability. The site is owned outright and promoted by WDL, a local and well renowned housebuilder; with a proven track record for delivering homes in the East Midlands. The intention is to submit a full application alongside the adoption of the Local Plan, with the aim to begin building out the site as soon as consent is gained (circa early 2021.) The Draft Local Plan evidence base notes the sustainability of Hathern as a settlement. With the 2018 Hierarchy Assessment audit placing Hathern the highest of all "other Settlements" in terms access to employment and general amenities. Being scored one point lower than Rothley, which is categorised as a "Service Centre." Notwithstanding this, the Village is well located in relation to the main town of Loughborough, and the available facilities, employment and sustainable transport means associated with the Urban core of Charnwood.	The site is included in the list of Housing Sites in the draft Local Plan and we will continue on-going discussions with William Davis about the site as the local plan progresses.

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	Alongside this, Charnwood Borough Council's site specific selection evidence a part of the SHLAA supports the site's allocation. The Landscape Review notes development to offer only a low to moderate impact for all areas of sensitivity considered; and Ecological Assessment notes the site to be of limited biodiversity value and that development could suitably mitigate against any potential harm. WDL have begun works in relation to access and drainage and intend to develop a full suite of documents to enable the submission of full application alongside the adoption of the Local Plan.	
HS70		
DCLP-264 LCC - Education	 Primary (Hathern CofE Primary) "• School site currently has 210 pupils and cannot expand due to flood risk issues so additional provision is problematic. • New schools on Garednon development may be within walking distance however timing may be an issue Sceondary (Loughborough Secondary Schools) "Capacity and scope to expand schools in Loughborough area 	Education provision is an important component of sustainable development and we are in on-going dialogue with LCCs education department. Site selection process has been informed by a strategic flood risk assessment and further more detailed flood risk evidence is also being undertaken. We will prepare delivery evidence which will inform the phasing and
		delivery of housing developments and associated infrastructure including education.
HS71		
DCLP/261 Edward Argar MP	Similar objections exist to proposals for 155 new properties in Queniborough [it would further eat away at the areas of separation between villages in the area, undermining their particular individual character, and running counter to other proposed policies in the Local Plan to protect the character of villages/ towns and maintain separation between settlements] In each of these cases the scale of the proposed development would, I believe, risk significantly altering the character of the existing village of itself, as well as running the risk of eroding the separation and separate unique identities of the village. This is quite apart from broader concerns about the impact of additional	Comments are noted. Site selection was informed by evidence of Green Wedges and Areas of Local Separation. The effect upon separation will be reviewed as part of further work on the local plan. We are engaged in ongoing discussions with infrastructure providers and will prepare infrastructure evidence to support the delivery of new homes.
EDCLP/252	pressures on local infrastructure arising from development of such a scale. While I believe overall in its thrust the Plan is a sound basis for future planning, I strongly believe that the above proposals are not the most appropriate way to proceed. Land off Melton Road, Queniborough (55 dwellings)	The site selection process has been informed by high level transport

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Leicestershire County Council	Land at Threeways Farm, Queniborough (100 dwellings): The sites are located on the C3308 Melton Road. This leads directly into Syston District Centre or to the A607, which is a key route to Melton/Leicester. The A607 also connects to the wider Strategic Road Network (A46 and M1); this will need to be reflected / considered in any transport assessment work.	assessment. Further detailed transport modelling will be undertaken as the local plan progresses. We will continue ongoing discussions with LCC to make sure these matters are considered in the modelling work.
HS71 & HS72		
EDCLP/78 Queniborough Neighbourhood Plan Steering Group	 Land at Three-Ways Farm (HS72) and Land off Melton Road (HS71) are also housing sites that lie outside the Settlement Boundary identified in our Draft Pre-Submission Neighbourhood Plan. In fact a planning application for houses to be built at Three-ways Farm (P/18/0611/2) was turned down By Charnwood in 2018 for the following reasons: The application lies outside the limits to development of the following built at the built of the following the built of the built	Concerns that a previous application was refused for this site are noted. That application was for a much larger scale of development of 220 dwellings. Further evidence has been undertaken since the application was refused including a sustainability appraisal, green wedge and local area separation review and transport modelling. Further evidence will be undertaken to understand the capacity of the site. The previous reasons for refusal will also be taken into consideration. The site selection process has been informed by ecology evidence
	 Queniborough, which is identified as an 'other settlement'. The proposal is not small scale nor is it within the settlement boundary and no housing needs have been demonstrated to justify this The development 'would cause substantive and significant harm to the Area of Local Settlement between Queniborough and East Goscote'. This was found to be not only contrary to the adopted Local Plan but also contrary to the aims and objectives of the National Planning Policy Framework. This situation is unchanged. The reasons given for the refusal of P/18/0611/2 are still valid in the proposed Local Plan, given Queniborough's unchanged status of an 'Other Settlement', the continued need to maintain the area of separation within in the terms of the NPPF, and the Settlement Boundary for Queniborough. Therefore, this site together with HS71, Land of Melton Road, cannot be included in the proposed Draft Charnwood Local Plan. In addition, Rupert Simms (Senior Ecological Officer at Charnwood Borough Council) who produced an assessment of the ecology in Queniborough Parish for our Neighbourhood Plan stated that: 'Land to the west of Queniborough is divided by the A607. To its north is a narrow strip comprised largely of species poor grassland 	 however evidence will be reviewed in light of Neighbourhood Plan evidence. The draft Local Plan considers housing need for the whole Borough, local housing need is more area specific. Comments on housing need are noted and will be reviewed through further evidence being prepared on housing need. Concerns over traffic are noted. High level transport modelling has been undertaken to support the preparation of the emerging local plan and a more detailed transport assessment is currently being prepared. We are also preparing further evidence on sustainable transport. The comments made will be taken into consideration. We have commissioned further work to understand the impact of the development strategy on air quality in Charnwood. The request for an AQMA in Queniborough is noted and will be considered through this work.

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and golf course with Queniborough Brook forming the northern parish boundary. At this point the brook is canalised and although it has not been recently surveyed is likely to be less ecologically interesting than other parts of the brook. Exceptions include narrow strips and blocks of scrub and woodland along the A607 and railway. These are significant given the very limited woodland cover elsewhere within the parish. South of the A607 is dominated by arable land and a plant nursery. A wet ditch runs parallel with the A607 and confluences with the river Wreake which forms the western parish boundary. This is not designated but is likely to be of local interest. There may be scope for enhancing it and it merits further survey. Although the land to the west of the village is nominally of low value it is known to support populations of great crested newt. This area of land represents a pinch point between the settlements of Queniborough and Syston to the south and East Goscote and Rearsby to the north.'

Therefore, the proposed development land, off Melton Road, is *'known to support populations of great crested newt'* and this should be taken into account particularly with regards to 'LP22: Conserving and Enhancing Biodiversity'.

No housing need was demonstrated when P/18/0611/2 was turned down. In fact, consultations that have taken place in the preparation of the Pre-submission Queniborough Neighbourhood Plan 2019-2028 has shown that these developments are at odds with local housing need established by the Neighbourhood Plan. The Neighbourhood Plan surveyed every house in the parish and subsequently established that 129 respondents indicated that they, or a member of their household, will be looking for alternative housing in the next 10 years (Neighbourhood Plan 7.11). 45% wanted to move because their current house is too large and 24% were looking to live independently. This need is specified in Neighbourhood Plan Policy Q14: Housing Mix. 'Applicants for the development of new housing will need to demonstrate how their proposals will meet the housing needs of older households and/or the need for smaller, low-cost homes for sale.'

Traffic was identified as the main concern by Queniborough villagers in the Neighbourhood Plan consultation. 81% of respondents to the Neighbourhood Plan Household Survey were concerned about traffic speeds; 71% with pedestrian safety; 66% with the number of heavy vehicles using the village despite the

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	weight restrictions and 93% about traffic volumes (Neighbourhood Plan 3.7, 3.13 and 3.23). The new housing sites in Queniborough, East Goscote and Rearsby are all positioned just off the Melton Road and as such will generate significant additional traffic using Queniborough and Syston as the main route into Leicester. The Melton Road provides a shared footpath/cycleway which is also utilised as National Cycle Network (NCN) route 48. NCN48 provides cyclists with good connectivity to Syston, East Goscote and Rearsby. The additional traffic will have a significant impact when crossing this shared footpath and cycleway.	
	This increase in traffic will increase the levels of air pollution that is associated with several health impacts. Therefore, QNPSG would like to see Charnwood Borough Council declare the Melton Road in Queniborough an Air Quality Management Area (AQMA) ensuring that it meets national air quality standards before any additional houses are built. Charnwood have already declared the Melton Road in Syston as an AQMA and QNPSG would like to also see how the new developments will also affect the road in Syston. In addition, QNPSG would like to see a current Base Traffic Survey, along the length of the Melton Road, undertaken before any further houses are built.	
EDCLP/91 Queniborough Parish Council	 HS72 at Three-ways Farm was subject to a planning application in 2018, P/18/0611/2. The application was turned down for the following reasons: The application lies outside the limits to development of Queniborough, which is identified as an 'other settlement'. The proposal is not small scale nor is it within the settlement boundary and no housing needs have been demonstrated to justify this 	Concerns that a previous application was refused for this site are noted. That application was for a much larger scale of development of 220 dwellings. Further evidence has been undertaken since the application was refused including a sustainability appraisal, green wedge and local area separation review and transport modelling. Further evidence will be undertaken to understand the capacity of the site. The previous reasons for refusal will also be taken into consideration.
	• The development 'would cause substantive and significant harm to the Area of Local Settlement between Queniborough and East Goscote'. This was found to be not only contrary to the adopted Local Plan but also contrary to the aims and objectives of the National Planning Policy Framework. The Council contends that this situation is unchanged. The reasons	The site selection process has been informed by a number of pieces of evidence including a sustainability appraisal to identify the most sustainable locations for new development in the Borough. Further sustainability appraisal work will be undertaken which will consider the cumulative impact of developments.
	given for the refusal of P/18/0611/2 are still valid in the proposed core strategy, given Queniborough's unchanged status within the plan, the continued need to maintain the area of separation within in the terms of the NPPF, and the area of the built environment for Queniborough. This site together with HS71, Land off Melton Road, cannot be included in the proposed Draft Charnwood Local Plan.	Comments on housing need are noted and will be reviewed through further evidence being prepared on housing need.

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	The Council would contend that given the reasons for refusal and the NPPF emphasis on sustainability these sites should not have been identified at all. The Council is also concerned that further development on Barkby Road, Syston at HS8 and HS9, will inevitably affect the character of Queniborough as a separate rural village. To maintain the rural nature of the surrounding landscape to the village no developments from Syston should spread onto the Barkby/Queniborough Road.	
	No housing need was demonstrated when P/18/0611/2 was turned down. In fact, consultations that have taken place in the preparation of the Pre-submission Queniborough Neighbourhood Plan 2019- 2028 has shown that these developments are at odds with the local housing need established by the Neighbourhood Plan. The Neighbourhood Plan surveyed every house in the parish and subsequently established that 129 respondents indicated that they, or a member of their household, will be looking for alternative housing in the next 10 years (Neighbourhood Plan 7.11). 45% wanted to move because their current house is too large and 24% were looking to live independently. This need is specified in Neighbourhood Plan Policy Q14: Housing Mix. 'Applicants for the development of new housing will need to demonstrate how their proposals will meet the housing needs of older households and/or the need for smaller, low-cost homes for sale'.	
EDCLP/98 Marrons on behalf of Hallam	HS72: Land at Threeways Farm Queniborough The Landscape Sensitivity Assessment of SHLAA Sites (March 2019 forms part of the evidence base for the Draft Local Plan. The	The concern over the site boundary and the Area of Local Separation are noted. The site selection process has been informed by green wedge and area of local separation evidence which will be reviewed in light of
Land Management Ltd	allocated site, in addition to the land to the north up to New Zealand Lane and to the east beyond Threeways Farm to the Queniborough roundabout (sites PSH42 and PSH446 by the report) is defined as a "developable sites". They assessed as being of no more than of "moderate" landscape sensitivity. For clarity, we are supportive of this strategy and Queniborough being identified as an Other Settlement, capable of meeting the day	the comments made and the recommendation that the area of local separation be amended slightly.
	to day needs of its residents. We also comfortable with the amount of development that is distributed to the Other Settlements and agree that the allocation at HS72 Threeways Farm is appropriate and justified. In principle, we also agree that there is merit in protecting the land between Queniborough and East Goscote as an Area of Local Separation. The only matter between the Council and	

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	our client relates to the boundary of the allocated site and the Area of Local Separation (ALS9).	
	•	
	to be Moderate - forms part of an important physical gap between Queniborough and East Goscote, playing a role in preventing their	
	coalescence (p.45) The Study recommended retaining the designation with no amendments (p.87).	
	ALS-J presents a different prospect for Queniborough in that the tract of land assessed is extensive and covers land to the north,	
	west and southeastern side of the settlement. The Study noted that	
	the "AoLS predominantly strongly bounded by defensible features, consisting of roads, railway lines, established hedgerows along	

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	field boundaries and well defined settlement edges. However, the	
	boundary of the AoLS to the east of Melton Road and north of the	
	A607 is weakly defined and does not appear to follow any readily recognisable features". In considering alternative boundaries it	
	found that "In the north-east of the AoLS, the boundary should be	
	realigned with the prominent settlement edge of East Goscote,	
	Melton Road and the edge of a wooded plantation. In the west, at	
	the edge of Syston, the boundary should be amended to reflect the	
	two outstanding residential planning permissions. It is suggested	
	that the boundary is aligned with a mixture of robust planted buffers	
	at the edge of the Queniborough Lodge site and, south of Melton	
	Road, well defined property edges and, subject to possible further	
	refinement, the edge of the residential application site" (p.73).	
	The Study also considered the 'purpose' of ALS-J and found it to	
	be Strong - provides the essential gaps between East Goscote,	
	Queniborough and Syston, restricting development which would	
	lead to the merging of these settlements. Although these gaps are	
	very small in scale the settlements are visually and functionally separate, with unique characteristics (p.45). The Study	
	recommended that the designation partially retained with boundary	
	amendments to exclude two Zones of Weakness in the west at the	
	edge of Syston and incorporate an Extension Opportunity Area in	
	the north-east at the edge of East Goscote (p.87).	
	The "Proximity of Neighbourhoods" for the Areas of Local	
	Separation has also been considered (Annex A of the 2016 Study.	
	In respect of ALS-J it concluded that:	
	"The gap between Queniborough and East Goscote is physically	
	very narrow (around 400m at its most narrow), it feels like a much	
	more substantial break as a result of the physical and visual	
	severance created by the A607, as well as the stronger functional	
	and landscape relationship between this area and the wider countryside" (p124-	
	125).	
	It goes on to say that "The A607, which has a dense planting buffer	
	and elevated position for much of its length, increases the	
	perceived distance between Queniborough and East Goscote". We	
	agree with this assessment and having examined the landscape	
	note a clear physical and perceptual separation between	
	Queniborough and East Goscote provided by the embanked and	
	tree lined corridor of the A607, that gently rises above and between	
	the two settlements, and by established vegetation of mature trees	
	along Queniborough Brook.	

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	Built development on the HS72 and indeed within the landscape up to a point commensurate with the northern extent of New Zealand Lane would not undermine the function or the integrity of the Area of Local Separation policy. There is significant separation between Queniborough and East Goscote and, in fact, development through a master plan approach will provide an opportunity to strengthen this separation and preserve "settlement identity"; for example, through design approaches such as new woodland planting and increased tree cover. This would also be consistent with the specific guidelines for development in this landscape as set out in the Council's 2019 Landscape Sensitivity Assessment (p. 106) which states that any future development within the area should "increase tree cover at the settlement edges to enhance the well wooded character of Queniborough village and self-contained character of the Wreake Valley". This is in accordance with the Council's Landscape Character Assessment (2012), and in particular, the specific landscape guidelines for the 'Wreake Valley Character Area' which includes: "Enhance the Wreake Valley landscape character around the fringes of the existing larger settlements by increasing tree cover". To re-iterate, we do not object to the principle of ALS9. However, it is our view that the assessment of ALS-J has considered too large an area and that a more granular assessment is required. It is our view that for the land closely associated with the north of HS72 and to the east of New Zealand Lane that a more granular, detailed assessment would have: □ recognised the areas of ALS-J with a strong purpose being to the north of the A607 Melton Road roundabout and the southern areas of land associated with Syston; □ judged the parcels adjacent to the eastern part of New Zealand Lane as Moderate at best and certainly not Strong; □ recognised the ability in which to create a better relationship between the built form at New Zealand Lane and Melton Road through new development, which c	

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	 concluded that the gap between Queniborough and East Goscote could be respected by an alternative boundary that maintains the separation. It is important to recognise that the Council's assessment of the character for ALS-J is heavily influenced by the greater part that lies between Queniborough and Syston to the south. Any development to the east of New Zealand Lane (within ALS-J) will have no impact upon the gap between Queniborough and Syston. , Built development would not extend any further north than the current built edge at New Zealand Lane and would effectively be hidden by the existing built up area. Woodland planting and increased tree cover incorporated around the development's northern and eastern boundaries is a positive intervention brought forward by development that would be in accordance with the Council's landscape evidence. This would reinforce the existing containment and separation between Queniborough and East Goscote, providing long term benefits. Put simply, the expanse of land associated with the wider ALS designation can still fulfil its function without the need to retain the land previously promoted by Hallam Land Management (P/18/0611/2) from development (see Appendix A – Development Framework Plan). 	
	CONCLUSION The Draft Plan identifies Queniborough as an Other Settlement, capable of meeting the day to day needs of its residents. An appropriate amount of development is distributed to the Other Settlements and the allocation through Draft Policy LP3 Housing Sites at HS72 Threeways Farm is appropriate and justified. The Draft Plan appropriately seeks to protect settlement identity including through the designation of Areas of Local Separation and designation of the land between Queniborough and East Goscote as Area of Local Separation 9 is supported in principle. The only matter between the Council and our client relates to the boundary of the allocated site at allocation HS72 Threeways Farm and the Area of Local Separation (ALS9). In our view the boundaries should be modified through an amended boundary which would reinforce the built form and not materially impact the Area of Separation.	
EDCLP/191 Stephen Harris Emery Planning	Emery Planning is instructed to submit representations to the Draft Charnwood Local Plan (2019–2036) Preferred Options consultation on behalf of the Hollins Strategic Land (hereafter referred to as	Comments made in support of inclusion of HS71 in the draft Local Plan are noted.

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on behalf of Hollins Strategic Land	'HSL'). HSL have an interest in land north of Melton Road, Queniborough. The extent of HSL's interests are shown on the site location plan appended at EP1.	
	These representations set out our support for the proposed allocation of site HS71 under Policy LP3. The site is a highly sustainable and logical choice for an allocation in order to meet the identified development needs of the borough and unmet housing needs of Leicester City. The site is a medium sized site which accords with paragraph 68 of the Framework.	
	As noted above, the Council has identified a need to provide at least 945 dwellings over the plan period in forth tier 'other settlements'. Policy LP3 seeks to allocate land for 794 of those dwellings in sustainable locations such as Queniborough. The allocation of 55 dwellings at HS71 would make a significant contribution to the overall provision of new housing in 'other settlements'. The level of allocations proposed in policy LP3 for the 'other settlements' is considered appropriate and should be retained. We support the allocation of the land north of Melton Road, Queniborough for residential development under site reference HS17. The allocation of the site to meet identified housing needs is justified by the evidence base, effective in that it is deliverable over the plan period, and consistent with national planning policy.	
	HS71 identifies a notional capacity of 55 dwellings for site HS71. We can confirm that this scale of development is achievable as a minimum capacity. The reminder of the land that is within the control of HSL is designated under draft policy LP19 as an 'Area of Local Separation' - reference: ALS10. We set out below a description of the land controlled by HSL, an assessment of the evidence which justifies the proposed allocation, and an assessment of the deliverability of the site during the plan period.	
	Site Location and Description The site location plan at EP1 shows the site lies to the immediate north west of the village of Queniborough, on greenfield land outside the existing settlement boundary, north of Melton Road. The site is bound to the north and east by the A607 and to the west by other parcels of greenfield land allocated for housing in the draft	

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	 local plan (allocation ref: HS72). Further to the west is New Zealand Lane. There are no issues associated with ownership, access, topography or any other technical constraints that would prevent our client's site from coming forward. This is confirmed in the SHLAA (Ref PSH446), which concludes: Suitable: There are no known irresolvable physical/environmental constraints preventing development but the site does not have good access to services and facilities. Available: Site is being promoted by a developer. Achievable: There is considered to be a reasonable prospect that development will be delivered within the timeframe below based on a judgement of the potential economic viability of the site and developer capacity to complete and let/sell the development over that period. 	
	Southbound and northbound bus stops are located approximately 200 metres from the site on Melton Road. Queniborough is a sustainable location with a range of services and facilities as confirmed in the Settlement Hierarchy Report. Therefore, HS71 is in a sustainable location, within short walking distance of the neighbouring bus stops and village centre. Together with the neighbouring allocation (HS72), the site's development would represent a logical extension to the village, which would be well screened by a landscaping buffer when viewed from the A607.	
	Site Assessment The sites inclusion within draft local plan policy LP3 demonstrates that the council consider the site suitable for residential development. HSL support the council's view and are confident that the site would be delivered without delay and would make a valid contribution to housing needs in the borough. Below we set out why the council are correct to include this land as a housing allocation within the draft local plan, and why this particular allocation should continue be retained within the emerging plan, as work continues toward adoption of the plan.	
	As part of the evidence base for the Plan the following reports have been prepared which are: • Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones & Als – March 2016 (Final); • Annex A - Assessment Pro-Formas - March 2016; and, • Green Wedges, Urban Fringe Green Infrastructure Enhancement	

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	Zones and Areas of Local Separation Methodology and Assessment Findings Report Addendum May 2019.	
	 The site has also been considered in two other parts of the evidence base, these being: SHLAA; and, Sustainability Appraisal: Spatial Strategy (SASS) – October 2019. 	
	The Green Wedge assessment concludes that ALS-J provides an important gap between Queniborough, East Goscote and Syston. However that report does not take the other factors such as housing need and the spatial strategy into account. That is taken in the SASS where the Green Wedge is one of a range of factors considered, one of which is "Landscape". Paragraph 7.2.33 states: "Site HS74 (Land at Threeways Farm) in Queniborough falls within an Area of Local Separation and is classified as moderate sensitivity. Development here therefore presents the possibility of negative effects. However, an area of open 'countryside' will remain between Queniborough and East Goscote, including open space between the proposed allocation and the A607. The land is currently agricultural and has no defining features, and therefore, the effects of a well-designed development would be minor. However, it will be important to ensure that 'rounding off' doesn't occur in the future, as this would reduce the gap between the two settlements. Overall, a neutral effect is predicted."	
	The reference in the SASS is the Threeways Farm site which is HS72 in the draft Plan which adjoins our client's land (HS71). It is clear that when the evidence base is considered in its totality the conclusion is that this is the most logical and sustainable to meet the housing needs for Queniborough. We support that conclusion and combination with the flood plain/open countryside to the north of the A607/south of East Goscote and the landscaped area to be retained on the land controlled by HSL, there will be both a functional and visual separation role between the villages of Queniborough to the south, and East Goscote to the north. This also accords with the evidence that HSL received from SLR Consulting in their advice dated 6th June 2018 (Appendix EP2).	
	Deliverability The land is controlled by HSL, an experienced land promotion company complete with its own housebuilding division. There are	

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	no restrictive covenants or ransom strips associated with the site. Suitable access can be achieved onto Melton Road on land within the control of our client. Therefore the site is controlled by a willing landowner, and there are no legal or ownership issues that would prevent development. Appendix EP3 is a summary of the delivery record of HSL in recent years. The Council can proceed in the confidence that the site is deliverable and can be delivered in the first 5 years of the housing land supply.	
	On achieving an allocation, our client intends to apply for planning permission before either developing the site itself, or disposing of the site to a developer at the earliest possible opportunity. We can also confirm further engagement with the Council and adjacent landowners (HS72). The site is suitable, available and deliverable.	
	Summary and Conclusions Emery Planning is instructed to submit representations to the Draft Charnwood Local Plan 2019 - 2036 on behalf of Hollins Strategic Land in respect of land north of Melton Road, Queniborough. Queniborough is a sustainable location suited to accommodating a proportionate level of the borough's housing growth. Our client's site is allocated within policy LP3 to provide at least 55 dwellings (HS71). The site is deliverable and is capable of making a significant contribution the 5 year supply of housing land. The site is controlled by an experienced land promotion company and housebuilder, and there are no legal or ownership issues that would prevent development. We therefore support the allocation of the site (HS71) in the further stages of the Charnwood Local Plan.	
	We would also request that we are notified of any future consultation opportunities on the emerging local plan and any engagement with developers on preferred sites in advance of such consultations. Appendices [PDFs available]: EP1. Site Location Plan; EP2. SLR Advice; EP3. HSL Delivery Record	
EDCLP/168 Sue Norledge Rearsby Parish	Rearsby Parish Council have the following consultation comments about the Charnwood Local Plan 2019-36.	
Council	Rearsby is a small medieval village designated as another settlement in the Charnwood hierarchy due to the lack of services	The concern over the scale of development proposed on this housing site against what is considered in the emerging neighbourhood plan is noted

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	available in this village of some 450 homes. The Pre-submission Version of the Rearsby Neighbourhood Plan looked at how to achieve sustainable development in Rearsby given the 58 recently completed properties and the 16 with planning permission on the former Convent site. Space has been identified within the NP for a small ribbon development along the old Gaddesby lane. This has been wrongly interpreted by the Charnwood Local Plan as a much larger site for 47 houses. The recent appeal for land along Melton road noted that "the provision of up to 66 dwellings in a village of 407 households (2011 census) would be considerably large development and in the context of the settlement hierarchy, in my view would not accord with CS policy CS1" Appeal ref APP/X2410/W/17/3190236. This would apply to this site of 47 houses as well.	 and the reasons for refusal given in the appeal decision will be reviewed. Site selection has been informed by high level transport assessments and further transport modelling evidence will also be undertaken. We are also undertaking sustainable transport evidence to understand how more journeys can be made by public transport. We will review local housing needs survey in light of comments made. We will also be undertaking further Housing Needs Assessment evidence. We will review local housing needs survey in light of comments made. We will also be undertaking further Housing Needs Assessment evidence.
	With the lack of services in the village, this size of development is not sustainable and would require private vehicle movements because of the limited public bus service, to access all local facilities for shops, doctors and chemists and employment.	evidence. We will review site capacity in light of comments made.
	Rearsby welcomes sustainable small-scale development and has work with landowners and planners on bringing the Convent site re development to fruition and the Rearsby House Farm development. The Parish Council has done multiple consultations with the villagers about the future provision for housing in the village and has identified some areas suitable for exception site development for affordable housing but has not yet secured landowner approval for such development. For the borough council to suggest that the village can support such a large development is not in accordance with its own core strategy need to find sustainable locations for development and given the village has no demonstrable need for this housing as evidenced by the recent rural housing need survey, conducted on behalf of Charnwood.	
	Further we note that the ribbon of Wreake valley villages of Queniborough, East Goscote and Rearsby are identified with a combined total of 425 houses within a space of two miles along the Melton Road. There is no identified local housing need at this level, so provision of these houses would be beyond the capacity of the local housing market to absorb them, making this uneconomic for the house builders.	

We request that the Local Plan be adjusted to reflect a development of 10 houses along Gaddesby Lane and not the 47 in the current version of the local plan. Primary (Queniborough CofE Primary)	
The school is on a confined site and unable to expand without additional land if Academy in agreement. Therefore may be necessary to claim transport costs in addition to S106 funds for a school in the locality. Secondary (Wreake Valley) Sufficient places at Wreake Valley however, developments for secondary places at Thorpebury (North East of Leicester) may have an effect.	Education provision is an important component of sustainable development and we are in on-going dialogue with LCCs education department.
HS71 and HS72 The land at Three Ways Farm and the other plot on Melton Road Queniborough is an area of interest for its wildlife and habitats including Greater Crested Newts	The site selection process has been informed by ecology evidence. The ecology evidence will be reviewed in light of the comment made about Great Crested Newts.
HS6, HS7, HS8, HS9, HS10, HS11, HS67, HS71 and HS72 - The housing allocations for Syston, Queniborough and East Goscote have all been refused this year	Comment that previous applications for sites have been refused is noted and reasons for refusal will be reviewed.
Queniborough [it would further eat away at the areas of separation between villages in the area, undermining their particular individual character, and running counter to other proposed policies in the Local Plan to protect the character of villages/ towns and maintain separation between settlements]. In each of these cases the scale of the proposed development would, I believe, risk significantly altering the character of the existing village of itself, as well as running the risk of eroding the separation and separate unique identities of the village. This is quite apart from broader concerns about the impact of additional pressures on local infrastructure arising from development of such	Comments are noted. Site selection was informed by evidence of Green Wedges and Areas of Local Separation. The effect upon separation will be reviewed as part of further work on the local plan. We are engaged in ongoing discussions with infrastructure providers and will prepare infrastructure evidence to support the delivery of new homes.
 basis for future planning, I strongly believe that the above proposals are not the most appropriate way to proceed. Land off Melton Road, Queniborough (55 dwellings) Land at Threeways Farm, Queniborough (100 dwellings): The sites are located on the C3308 Melton Road. This leads 	The site selection process has been informed by high level transport assessment. Further detailed transport modelling will be undertaken as the local plan progresses in liaison with LCC and HE. We will continue ongoing discussions with LCC to make sure these matters are
	additional land if Academy in agreement. Therefore may be necessary to claim transport costs in addition to S106 funds for a school in the locality. Secondary (Wreake Valley) Sufficient places at Wreake Valley however, developments for secondary places at Thorpebury (North East of Leicester) may have an effect. HS71 and HS72 The land at Three Ways Farm and the other plot on Melton Road Queniborough is an area of interest for its wildlife and habitats including Greater Crested Newts HS6, HS7, HS8, HS9, HS10, HS11, HS67, HS71 and HS72 - The housing allocations for Syston, Queniborough and East Goscote have all been refused this year Similar objections exist to proposals for 155 new properties in Queniborough [it would further eat away at the areas of separation between villages in the area, undermining their particular individual character, and running counter to other proposed policies in the Local Plan to protect the character of villages/ towns and maintain separation between settlements]. In each of these cases the scale of the proposed development would, I believe, risk significantly altering the character of the existing village of itself, as well as running the risk of eroding the separation and separate unique identities of the village. This is quite apart from broader concerns about the impact of additional pressures on local infrastructure arising from development of such a scale. While I believe overall in its thrust the Plan is a sound basis for future planning, I strongly believe that the above proposals are not the most appropriate way to proceed. Land off Melton Road, Queniborough (55 dwellings) Land at Threeways Farm, Queniborough (100 dwellings):

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	route to Melton/Leicester. The A607 also connects to the wider Strategic Road Network (A46 and M1); this will need to be reflected / considered in any transport assessment work.	considered in the modelling work.
Q8 - LP3 - Housin Specific Sites - L	g Sites eicester Urban Area excluding HS6	
	stall Meadow Road/Long Meadow Way, Birstall	
DCLP/264	Minor impact on primary school (Hallam Fields) and secondary	Education provision is recognised as an important component of
LCC-Education	school (Cedars Academy) requirements due to size of development.	sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252	S38 (unadopted) road maintained by developers fronting the	Noted – site access will be explored further
Leicestershire	proposed site; access works required to be approved by LHA plus	
County Council	developer/s who maintain the road.	
HS5	Land at Gynsill Land and Anstey Lane, Glenfield	
DCLP/256 Vale Planning Consultants	 Only two small portions of the site are allocated; this should be reconsidered and allocated in its entirety. Larger allocation would provide benefits for infrastructure provision, transport, SuDs, ecology, and urban design 	Any newly submitted evidence and additional sites will be assessed for allocation in the plan as we seek to achieve the most appropriate mix of sites to meet our development strategy.
	 Transport link through the site would have wider strategic benefits Can deliver public transport route Strong case for release from Green Wedge, green corridors can 	
	still provide wildlife connectivity and public access whilst there will	
EDCLP/80 Historic England	 be no coalescence with Anstey Seek archaeological advice as the Park Pale is within site Wider setting issues should be taken into account Site is flagged within the second interim SA report. 	Archaeology and the historic environment is recognised as an important component of sustainable development and will be taken into account during site selection.
EDCLP/163 Liz Hawkes Anstey Parish	 Recognise further development required in the parish but do not support site allocation 	Site selection was informed by evidence and are those that best meet the Council's objectives.
Council	 Neighbourhood plan is in preparation and any allocation would not take this into account 	The neighbourhood plan is in the early stages of preparation and has limited weight; however, its evidence base and any consultation responses can be considered as the Local Plan is prepared.
EDCLP/258 Sam Heaton Heaton Planning	 Site located in Green Wedge, contains archaeological interest and is remote from the urban fringe, contrary to Draft Policy LP19 	Sites in the draft plan were assessed across a number of categories as those that best meet the Council's objectives and key principles.
on behalf of Swithland Homes Ltd	 Land to the east of Gynsill Lane, as submitted, would be better assimilated with existing settlement, retaining openness and not prejudice the Green Wedge 	Any newly submitted information will be assessed as we seek to achieve the most appropriate mix of sites to meet our development strategy.
DCLP/264 LCC - Education	 2 primary schools in Anstey with flexibility but concerns over safe access routes Secondary school capacity in Anstey but catering for 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
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	significant current developments creating capacity issues in next 10 years; concerns over safe access routes	
DCLP/252 Leicestershire County Council	 Need to consider cross-boundary implications for Leicester City (A563 outer distributor road) and/or Highways England (A46 & M1) 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
	 Consider potential for drivers divert to less congested, less appropriate routes 	Joint highways work on HS5 is being undertaken with partners.
	 Anstey Lane is an A-class road with a speed limit over 40mph thus may be restricted by policy IN5 of the LHDG 	
	 Coordinated, joint working to deliver a comprehensive masterplan sought in the context of potential adjoining growth opportunities in Leicester City and Blaby District 	
DCLP/266 Leicester City Council	 CBC, Blaby, City and County Councils had early engagement with the promotors of land west of Anstey Lane/south of Gynsill Lane 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and the additional information is welcomed.
HS7 - Brook Street	 Some in-principle issues and practical challenges but potential exists for a strategic development with transport and environmental infrastructure benefits City Council has identified land west of Anstey Lane as a strategic housing site in the City's draft Local Plan CBC invited to consider wider strategic benefits of a comprehensive allocation and a combined approach to increase public benefits and achieve full highway and transport impact mitigation As proposed, HS5 does not promote a cohesive Masterplan strategy and misses an opportunity to achieve a significant modal shift to sustainable modes of transport and maximising transport solutions 	Additional information will be assessed as we seek to achieve the most appropriate sites to meet our development strategy and deliver sustainable development.
DCLP/425-470 Environment	 Site in Flood Zone 2 and 3a which should be taken into account; an FRA will be required 	Site selection has been informed by flood risk evidence but will be reviewed in light of representation.
Agency	 Within 250m of a permitted Household, Commercial & Industrial Waste site 	Allocated sites will seek to ensure that the amenities of people who will live in new developments are protected.
DCLP/264 LCC - Education	 Primary school site required to meet need from proposed developments in Syston unless it is additional land acquired to extend existing schools. 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
	 Sufficient Secondary places at Wreake Valley however, developments at N. East Leicester SUE may have an effect 	
EDCLP/256 John Weston	 Housing allocations for Syston, Queniborough and East Goscote have all been refused this year 	Site selection was informed by evidence and are those that best meet the Council's objectives. Previous decisions will be assessed but this

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DCLP/261 Edward Argar MP	 Scale of proposed development in Syston would create additional pressures on local infrastructure 	represents a draft, new Local Plan. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
HS8 & HS9 - Land	north of Barkby Road & Barkby Road, Syston	
EDCLP/31 Barkby & Barkby Thorpe Parish	 HS8 & HS9 will add to already intolerable amount of traffic heading to/from Leicester via Barkby and Barkby Thorpe and HS6 may add to this pressure 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
Council	 Increase in traffic will increase the level of air Flooding and climate change should warn against building on the flood plain and low-lying areas for housing 	An air quality study is currently being undertaken. Site selection has been informed by flood risk evidence but will be reviewed in light of representation.
EDCLP/32 BABTAG	 HS8 & HS9 will add to already intolerable amount of traffic heading to/from Leicester via Barkby and Barkby Thorpe and HS6 may add to this pressure 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
	 Increase in traffic will increase the level of air Flooding and climate change should warn against building on the flood plain and low-lying areas for housing 	An air quality study is currently being undertaken. Site selection has been informed by flood risk evidence but will be reviewed in light of representation.
EDCLP/36 Mr & Mrs Atkins	 HS8 & HS9 will add to already intolerable amount of traffic heading to/from Leicester via Barkby and Barkby Thorpe and HS6 may add to this pressure Increase in traffic will increase the level of air Flooding and climate change should warn against building on the flood plain and low-lying areas for housing 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. An air quality study is currently being undertaken. Site selection has been informed by flood risk evidence but will be reviewed in light of representation.
EDCLP/43 Mr & Mrs Cunningham	 Will add to already intolerable amount of traffic heading to/from Leicester via Barkby and Barkby Thorpe and HS6 may add to this pressure Increase in traffic will increase the level of air Flooding and climate change should warn against building on the flood plain and low-lying areas for housing 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. An air quality study is currently being undertaken. Site selection has been informed by flood risk evidence but will be reviewed in light of representation.
EDCLP/78 Queniborough Neighbourhood Plan Steering Group	 Will have severe consequences increasing traffic volumes through Queniborough and Barkby causing more congestion Crossroads, in Queniborough at capacity in peak periods; need to establish the current use and capacity of the roads affected by the proposed developments Area of separation between Syston and Queniborough will be reduced impacting on landscape character and 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. Site selection was informed by evidence, including landscape, and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation.

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	Queniborough as a separate rural village	
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 Sites are on the urbanised edge of the High Leicestershire National Character Area and sensitive, requiring careful treatment to be developed 	Site selection was informed by evidence, including landscape, and are those that best meet the Council's objectives. Masterplanning can reduce specific impact issues.
EDCLP/221 Nick Baker Lichfields on behalf of CEG	 All sites need to contribute to infrastructure to ensure that additional infrastructure or impacts are fully met and mitigated Larger sites should not be prejudiced by smaller sites Number of sites allocated on edge of urban area and market impacts and delivery timing need to be considered over the course of the plan 	Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. Site selection was informed by evidence, including on delivery, and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation.
DCLP/264 LCC - Education	 Primary school site required to meet need from proposed developments in Syston unless it is additional land acquired to extend existing schools. Sufficient Secondary places at Wreake Valley however, developments at N. East Leicester SUE may have an effect 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/256 John Weston	 Housing allocations for Syston, Queniborough and East Goscote have all been refused this year 	Site selection was informed by evidence and are those that best meet the Council's objectives. Previous decisions will be assessed but this represents a draft, new Local Plan.
EDCLP/252 Leicestershire County Council	 No comments made on HS8 and HS9 	
HS8 - Land north of	of Barkby Road, Syston	
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	 Allocation of HS8 is supported and work has been undertaken to support an outline planning application which has demonstrated no technical constraints Site is suitable and deliverable in the early part of the plan period to assist in maintaining a five-year supply Site is capable of accommodating 195 dwellings (additional info provided) and allocation should be amended 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and additional supporting information is welcomed.
DCLP/261 Edward Argar MP	 Allocations impact on areas of separation, undermining individual character and are contrary to Local Plan policies Scale of proposed development in Syston would create additional pressures on local infrastructure 	Site selection was informed by evidence, including on settlement coalescence, and are those that best meet the Council's objectives. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
HS9 - Barkby Road		
EDCLP/221	 All sites need to contribute to infrastructure to ensure that 	Infrastructure provision is an important aspect of ensuring sustainable

ditional infrastructure or impacts are fully met and itigated arger sites should not be prejudiced by smaller sites umber of sites allocated on edge of urban area and arket impacts and delivery timing need to be considered ver the course of the plan locations impact on areas of separation, undermining dividual character and are contrary to Local Plan policies cale of proposed development in Syston would create ditional pressures on local infrastructure elson welcomes the Council's proposal to allocate its site Barkby Road in Syston for a development comprising 208 vellings in the Preferred Option paper (Allocation HS9). owever, having recently undertaken an initial asterplanning work, Jelson wishes to advise the Authority at the outcome of this analysis indicates that the site is	 development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. Site selection was informed by evidence, including on delivery, and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation. Site selection was informed by evidence, including on settlement coalescence, and are those that best meet the Council's objectives. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. The proposed development yield of the site (270 dwellings) is noted. This information will be an input into further site assessment work, and will inform the next stage of the local plan
dividual character and are contrary to Local Plan policies cale of proposed development in Syston would create additional pressures on local infrastructure elson welcomes the Council's proposal to allocate its site Barkby Road in Syston for a development comprising 208 vellings in the Preferred Option paper (Allocation HS9). owever, having recently undertaken an initial asterplanning work, Jelson wishes to advise the Authority	 coalescence, and are those that best meet the Council's objectives. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. The proposed development yield of the site (270 dwellings) is noted. This information will be an input into further site assessment work, and will
Barkby Road in Syston for a development comprising 208 vellings in the Preferred Option paper (Allocation HS9). owever, having recently undertaken an initial asterplanning work, Jelson wishes to advise the Authority	information will be an input into further site assessment work, and will
apable of accommodating 270 dwellings without giving rise any unacceptable adverse impacts. Our Client would erefore welcome the opportunity to discuss its proposals more detail with officers, to determine whether the umber of dwellings that the Preferred Option paper dicates that the site is capable of delivering could be creased accordingly.	
, Syston	
imary school site required to meet need from proposed evelopments in Syston unless it is additional land acquired extend existing schools. ufficient Secondary places at Wreake Valley however, evelopments at N. East Leicester SUE may have an effect	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
ousing allocations for Syston, Queniborough and East oscote have all been refused this year	Site selection was informed by evidence and are those that best meet the Council's objectives. Previous decisions will be assessed but this represents a draft, new Local Plan.
locations impact on areas of separation, undermining dividual character and are contrary to Local Plan policies cale of proposed development in Syston would create dditional pressures on local infrastructure	Site selection was informed by evidence, including on settlement coalescence, and are those that best meet the Council's objectives. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
	erefore welcome the opportunity to discuss its proposals more detail with officers, to determine whether the mber of dwellings that the Preferred Option paper dicates that the site is capable of delivering could be creased accordingly. Syston imary school site required to meet need from proposed velopments in Syston unless it is additional land acquired extend existing schools. Ifficient Secondary places at Wreake Valley however, evelopments at N. East Leicester SUE may have an effect ousing allocations for Syston, Queniborough and East oscote have all been refused this year

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/78 Queniborough Neighbourhood	 Site is in Queniborough's Neighbourhood Plan Designated Area and parish boundary Site is proposed for housing development in the 	The site is within the Queniborough parish but is considered to better relate to the Syston urban area.
Plan Steering Group	Queniborough Neighbourhood Plan	The allocation would accord with the Queniborough Neighbourhood Plan
DCLP-425-470 Environment Agency	 Site in Flood Zone 2 and 3a which should be taken into account; an FRA will be required 	Site selection has been informed by flood risk evidence but will be reviewed in light of representation.
DCLP/264 LCC - Education	 Primary school site required to meet need from proposed developments in Syston unless it is additional land acquired to extend existing schools. Sufficient Secondary places at Wreake Valley however, developments at N. East Leicester SUE may have an effect 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/256 John Weston	 Included in Syston's allocation but should be included in Queniborough's commitment to housing supply 	The site is within the Queniborough parish but is considered to better relate to the Syston urban area.
EDCLP/256 John Weston	 Housing allocations for Syston, Queniborough and East Goscote have all been refused this year 	Site selection was informed by evidence and are those that best meet the Council's objectives. Previous decisions will be assessed but this represents a draft, new Local Plan.
DCLP/261 Edward Argar MP	 Allocations impact on areas of separation, undermining individual character and are contrary to Local Plan policies Scale of proposed development in Syston would create additional pressures on local infrastructure 	Site selection was informed by evidence, including on settlement coalescence, and are those that best meet the Council's objectives. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
HS12 - Works opp	osite 46 Brook Street, Thurmaston	
EDCLP/192 Severn Trent Water	 Require further information on certainty of development and the timescales to enable capacity improvements requirements to be reviewed and implemented. 	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version.
DCLP-264 LCC - Education	 Primary requirement can be accommodated in existing schools Sufficient Secondary places at Wreake Valley however, developments at N. East Leicester SUE may have an effect 	We will continue to engage with Severn Trent as the plan progresses Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
HS13 - Works adja	cent 46 Brook Street, Thurmaston	
EDCLP/192 Severn Trent Water	 Require further information on certainty of development and the timescales to enable capacity improvements requirements to be reviewed and implemented. 	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses
DCLP-264 LCC - Education	 Primary requirement can be accommodated in existing schools Sufficient Secondary places at Wreake Valley 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	however, developments at N. East Leicester SUE may have an effect	
HS14 - Rear of 36	- 46 Colby Road, Thurmaston	
DCLP-264 LCC - Education	 Primary requirement can be accommodated in existing schools Sufficient Secondary places at Wreake Valley however, developments at N. East Leicester SUE may have an effect 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 No shared boundary with public highway, rear of properties/ 	Highway access is an important aspect of site allocation and will be examined.
HS15 - Rear of Ma	nor Medical Centre, Melton Road, Thurmaston	
DCLP-264 LCC - Education	 Primary requirement can be accommodated in existing schools Sufficient Secondary places at Wreake Valley however, developments at N. East Leicester SUE may have an effect 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Does not abut public highway Close to City boundary and key route to City and strategic road network 	 Highway access is an important aspect of site allocation and will be examined. Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS16 - Land off B	arkby Thorpe Lane, Thurmaston	
EDCLP/221 Nick Baker Lichfields on behalf of CEG	 All sites need to contribute to infrastructure to ensure that additional infrastructure or impacts are fully met and mitigated Larger sites should not be prejudiced by smaller sites Number of sites allocated on edge of urban area and market impacts and delivery timing need to be considered over the course of the plan 	Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. Site selection was informed by evidence, including on delivery, and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation.
EDCLP/192 Severn Trent Water	 Require further information on certainty of development and the timescales to enable capacity improvements requirements to be reviewed and implemented. 	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses
DCLP-264 LCC - Education	 Primary requirement can be accommodated in existing schools Sufficient Secondary places at Wreake Valley however, developments at N. East Leicester SUE may have an effect 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/277 RPS obo Bellway Homes	Re: Draft Charnwood Local Plan 2019-36 – Preferred Options Consultation (October 2019) I write with reference to the above. As you are aware, RPS Consulting UK & Ireland (RPS) act on behalf of Bellway Homes East Midlands ('Bellway'), who have an interest in the Land off	The development yield of the site (105 dwellings) is noted. This will be an input into further site assessment work, and will inform the next stage of the local plan.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	Barkby Thorpe Lane, Thurmaston, proposed as draft site allocation (HS16). This site was promoted previously at the Issues and Options 'Towards a Local Plan for Charnwood' consultation' (June 2018) and to the Strategic Housing and Employment Land Availability Assessment (SHLAA) with site reference PSH189. In the SHLAA the Council refer to the site as follows: 'There are no known irresolvable physical/environmental constraints preventing development, the site is in a suitable location for development adjacent the PUA and a suitable access can be achieved.'	
	As there is no housing trajectory to support the proposed allocations, it is difficult to understand the Council's assumptions on lapse rates, windfall allowances, lead-in times and delivery rates for the 73 sites identified, across the plan period. This is contrary to the NPPF. Despite this, and as set out in your draft Chapter 5: Housing, draft Policy LP 3 and the Second Interim SA, Bellway would endorse the approach outlined for the distribution of housing and the proposed settlement hierarchy and the principle of maintaining separate identities for Thurmaston, Syston and Barkby, albeit with smaller local landscape areas. This ensures that there are a range of site sizes to provide variety and flexibility, although it is unclear when the Council would expect these sites to come forward.	
	It is positive to note that the proposed housing allocation HS16, Land off Barkby Thorpe Lane, Thurmaston (SA reference: S91, PSH189) is recognised as a larger site on the urban fringes that performs relatively well in terms of accessibility, and does not exhibit any notable environmental constraints. As stated previously it is a site that can be delivered early on in the plan period. On the basis of this, we consider that the site has more potential for development and that a larger site area should be considered, including the land to the north adjacent Syston, especially in light of the imminent changes to biodiversity net gain which inevitably will require sites to consider a wider area without impacting negatively on the proposed dwelling numbers allocated to each site. As such a greater number than 70 units, of around 105 dwellings should be considered for immediate allocation at this site with an additional option considered which safeguards the land adjacent to Roundshill Academy for development either as a secondary school to support the North East of Leicester SUE or as additional housing land in the	

RESPONSE NO/		
CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	event this land is not required for education purposes.	
	Deliverability of draft allocation site (HS16): off Barkby Thorpe Lane	
	 Deliverability of draft allocation site (HS16): off Barkby Thorpe Lane The site at Land north of Barkby Thorpe Lane, on the edge of Syston and Thurmaston is identified at Appendix 1 attached to this letter. The site lies adjacent to the North East of Leicester SUE (SUE) (allocated in the Charnwood Local Plan 2011-2028 Core Strategy) and was previously subject of a detailed application for residential development for 224 homes (ref: P/14/1610/02). As a result, a substantial amount of work has been undertaken to demonstrate the suitability and deliverability of development on the site. The site would deliver a number of benefits, including providing a range of new homes, including affordable homes and a significant area of accessible green space. It could also help to secure the route of the Northern Link Road for the SUE, if required, and would deliver housing quickly to assist in meeting Charnwood's housing need in the short term. It has no environmental constraints and is capable of coming forward in the early years of the plan period It is worth reminding the Council that in its draft Committee Report for the previous application for 224 homes, the Council were able to find as follows: The proposed development is located adjacent to a location in the highest tier of the development strategy in terms of sustainability. Access to the site is proposed via a new priority junction off Barkby Thorpe Lane located midway between the junction with Thorpe Field Drive and Brackenfield Way on the opposite side of the carriageway. This is acceptable to the Highway Authority. The site is not considered to be high landscape value. Landscape of similar quality appears readily in the wider locality and does not 	
	demonstrate any special or significant value. In terms of visual amenity, it is considered that there would be no long term	
	significant adverse effects from wider landscape viewpoints - In terms of the Area of Local Separation, the remaining land	
	would continue to fulfil the role and function of an area of Local	
	Separation and, on balance, the overall benefits of providing houses in a sustainable location next to a SUE would outweigh any	
	minimal loss of this area of land.	
	- There are no Listed Buildings or Conservation Areas within the	
	vicinity of the development site and the heritage assets in nearby settlements are considered to be too far away to be harmed by the	
	settlements are considered to be too far away to be named by the 746	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	development. There would therefore be no substantial or less than	
	substantial harm caused to such heritage assets.	
	- There are no impacts on the statutory and non-statutory sites identified within 2km of the site and biodiversity found on site can	
	be protected through mitigation.	
	- The development is considered to be in keeping with the	
	character of the area as the type of dwellings proposed and the	
	density will accord with the development context.	
	- The development is considered to be acceptable in terms of	
	flooding and drainage	
	- The proposed layout and design is considered to be acceptable	
	and in keeping with the character and appearance of the area and there is sufficient open space and playing provision that meets the	
	requirements of the Council's Open Spaces Strategy.	
	The site remains suitable and achievable. It is controlled by one of	
	the UK's largest housebuilders, a national 5-star housebuilder	
	developer with a strong track record of delivering much needed	
	high quality family homes in the area and who have demonstrated	
	a very strong commitment to delivering this site over many years. Importantly in terms of deliverability, whilst the earlier application	
	for 224 homes was withdrawn due to uncertainty surrounding its	
	relationship with the route of the Northern Link Road, the proposed	
	draft allocation for 70 homes, alongside the additional land being	
	promoted adjacent to Syston for 35 homes, (105 total) would	
	significantly reduce the size of the development, avoiding any	
	potential impact on the route of the road.	
	Accordingly, Land north of Barky Thorpe Lane, Thurmaston is a	
	suitable, available and achievable development site and Bellway	
	Homes support of the draft allocation subject to: - Increasing the allocation to include available land adjacent to	
	Syston, as promoted: and	
	- Safeguarding land adjacent to Roundhill Academy for future	
	development (either for education use if required or additional	
	housing land if not)	
Q8 - LP3 - Housin		
	oughborough excluding HS33, HS34, HS35, HS36 and HS37	
LDCLP/14	ederick Street, Loughborough	Impact on the highway network is an important aspect of site selection
F W Dajani	No consideration given to removal of residents parking	and will be assessed through further transport modelling.
	 Impact of HMOs Impact on roads, congestion and highway safety 	and win be assessed through further transport modeling.
	• Impact on roads, congestion and highway salety	Allocated sites will seek to ensure that the amenities of existing residents
L	7/7	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	Impact on air quality	are protected.
LDCLP/16 Dorothy Bowman	 Site is part of titled land of residential properties Loss of gardens would leave little amenity space for existing properties 	Site suitability and availability is being assessed as part of this consultation.
	 Access widening would further reduce separation between properties 	Allocated sites will seek to ensure that the amenities of existing residents are protected.
	 Recent flat development opposite site increase density Issues with ownership of access and access width Parking problems in the area increased with this development 	Site selection has been informed by evidence, including on highways and biodiversity, and are those that best meet the Council's objectives. This will be reviewed in light of representations received.
	 Conservation Area Impact on environment and biodiversity How will the new facilities required be achieved? 	New facilities will be achieved through S106 legal agreements.
LDCLP/29 Janet Spavin & David Rogers	 Site is part of titled land of residential properties Loss of gardens would leave little amenity space for existing properties 	Site suitability and availability is being assessed as part of this consultation.
	 Access widening would further reduce separation between properties 	Allocated sites will seek to ensure that the amenities of existing residents are protected.
	 Recent flat development opposite site increase density Issues with ownership of access and access width Parking problems in the area Conservation Area 	Site selection has been informed by evidence, including on highways and biodiversity, and are those that best meet the Council's objectives. This will be reviewed in light of representations received.
	Impact on environment and biodiversityNew facilities will be required	New facilities will be achieved through S106 legal agreements.
EDCLP/80 Historic England	 Located at edge of Conservation Area, park and Grade II Carrillon Tower 	Site selection was informed by evidence, including heritage, and are those sites that best meet the Council's objectives.
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
	eacon Road, Loughborough	
EDCLP/121 Marie Birkinshaw	 Potential green space or nature reserve Development would impact on biodiversity, archaeology Pedestrian and cycle route with access issues for cars 	Site selection was informed by evidence, including biodiversity, and are those sites that best meet the Council's objectives. This will be reviewed in light of representations received.
		Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
EDCLP/125 Tim Birkinshaw	 Wildlife corridor and potential public open space Former refuse dump Access issues 	Site selection has been informed by evidence, including biodiversity, and are those that best meet the Council's objectives. This will be reviewed in light of representations received.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
DCLP-425-470 Environment Agency	 Land within the Beacon Road Landfill 's Permitted boundary, IMMEDIATELY adjacent to a Permitted Landfill (EAWML 43294), which is regulated by the Environment Agency. High concentrations of Hydrogen Sulphide within the site at concentrations above human health exposure limits and extreme caution should be exercised for further residential development. 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. The site was selected following evidence known at the time. This will be reviewed in light of representations received.
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Does not abut public highway 	Highway access is an important aspect of site allocation and will be examined.
	e, 3 – 6 Cattlemarket, Loughborough	
EDCLP/80 Historic England	 Within Conservation Area adjacent to Grade II Town Hall façade 	Site selection was informed by evidence, including heritage, and are those sites that best meet the Council's objectives.
DCLP-425-470 Environment Agency	 Includes flood zone 2 and requires flood risk assessment May benefit from Wood Brook flood risk management scheme 	Site selection was informed by evidence, including flooding, and are those sites that best meet the Council's objectives.
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	Pedestrianised highway	Town centre location, well served by sustainable modes of transport
	s Road Car Park, Loughborough	
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
HS21 - Devonshire	e Square Opportunity Site, Loughborough	
EDCLP/80 Historic England	 Within Conservation Area, may affect setting of Carillon Tower 	Site selection was informed by evidence, including heritage, and are those sites that best meet the Council's objectives.
EDCLP/129	Ground floor should be retained for retail use only	The Local Plan supports the main retail attractions of the town centre and

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Penny & Stuart Ward	 Housing above ground floor should be no more than two further levels to prevent overdominance within town centre. 	seeks to maintain active street frontages. The Plan seeks to preserve the character and appearance of the town centre and supports improvements to the built environment.
DCLP-425-470 Environment Agency	 Inappropriate for housing development due to flood risk from Wood Brook, current uses from flooding Current misalignment within the Environment Agency flood information at this location (please see accompanying plan 'Development Issue, Loughborough, Charnwood"") Will require flood risk permit for as within 8m of main river May benefit from the Wood Brook flood risk management scheme 	Site selection was informed by evidence, including flooding, and are those sites that best meet the Council's objectives. This will be reviewed in light of representations received.
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Key routes for orbital traffic movements around Loughborough urban centre and need to be considered in any transport assessment work 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS22 - Former Pet	rol Station, Pinfold Gate, Loughborough	
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Pinfold Gate is intersected by A6 part of County's proposed Major Road Network and is a key orbital route for traffic movements around Loughborough urban centre; experiences congestion and delays in peak periods. 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS23 - Part of Bax	ter Gate Opportunity Site, Loughborough	
EDCLP/80 Historic England	 Within Conservation Area and should preserve and enhance the character and appearance of the Conservation Area 	Site selection was informed by evidence, including heritage, and are those sites that best meet the Council's objectives.
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Pinfold Gate is intersected by A6 part of County's proposed Major Road Network and is a key orbital route for traffic movements around Loughborough urban centre; experiences congestion and delays in peak periods. 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
HS24 - Retail Ward	ehouse Car Park, Regent Place, Loughborough	
DCLP-425-470 Environment Agency	 Could be affected by the Flood Zones 2 & 3a and requires flood risk assessment and potentially exception test 	Site selection was informed by evidence, including flooding, and are those sites that best meet the Council's objectives. This will be reviewed in light of representations received.
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Abuts A6 which forms part of the County's proposed Major Road Network and is a key route that provides traffic movements around Loughborough urban centre; experiences congestion and delays in peak periods 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
	use, Forest Road, Loughborough	
DCLP-264 LCC-Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Forest Road is a one-way street in the direction and forms a key route that provides orbital traffic movements into and around Loughborough urban centre 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS26 - 31 32 Mark	et Place, Loughborough	
DCLP-264 LCC-Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Pedestrianised highway 	Town centre location, well served by sustainable modes of transport
	Knightthorpe Road, Loughborough	
DCLP-264 LCC-Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
	in Post Office, Sparrow Hill, Loughborough	
EDCLP/80 Historic England	 Within Conservation Area and should preserve and enhance the character and appearance of the Conservation Area 	Site selection was informed by evidence, including heritage, and are those sites that best meet the Council's objectives.
DCLP-264 LCC-Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/252 Leicestershire County Council	 Loughborough area Within 120m of A6 Jubilee Way part of County's proposed Major Road Network and is a key orbital route for traffic movements around Loughborough urban centre; experiences congestion and delays in peak periods 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
	ourt Shopping Centre, Derby Square, Loughborough	
EDCLP/80 Historic England	 Within Conservation Area and should preserve and enhance the character and appearance of the Conservation Area 	Site selection was informed by evidence, including heritage, and are those sites that best meet the Council's objectives.
DCLP-425-470 Environment Agency	 Current misalignment with the Environment Agency's flood map information for this location Located within Flood Zones 3a & 3b and contains Main River culvert and requires flood risk assessment and exception test Requires easement of 8m from main river and will require flood risk permit May benefit from the future Wood Brook flood risk management scheme 	Site selection was informed by evidence, including flooding, and are those sites that best meet the Council's objectives. This will be reviewed in light of representations received.
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to secondary expand schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 One-way street and subsequently the A6004 Epinal Way (part of the County's proposed Major Road Network around Loughborough) 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS30 - Park Grang	ge Farm, Newstead Way, Loughborough	
EDCLP/80 Historic England	Site includes a Grade II building	Site selection was informed by evidence, including heritage, and are those sites that best meet the Council's objectives. Listed building can be accommodated through sympathetic design.
EDCLP/228 Haddon Way Residents Association	 Infrastructure delivery plan is dated and should be produced in combination with the Local Plan as it's just as important Infrastructure delivery plan is to be prepared to understand what is required to support development, but infrastructure is required to support development Need to look at Borough as a whole over next 100+ years, piecemeal development doesn't provide infrastructure Infrastructure needs providing where needed and before housing developed with penalties for not providing 1000 dwellings proposed to south Loughborough, away from bus services, schools oversubscribed, no medical facilities 	 Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. The infrastructure delivery plan will identify when, where and how the requirements will be met. Large scale development can take many years to deliver, smaller developments can deliver in a shorter timeframe. Charnwood already has 3 large urban extensions proposed, the smaller developments in this plan will supplement that. Viability is another important consideration for delivering the Local Plan,

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 Current residents require infrastructure and facilities, the plan makes no mention of this 	this means it is not always possible to provide infrastructure before the housing that will pay for this.Planning legislation means that new development cannot be required to correct existing deficiencies in infrastructure and facilities
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
HS31 - Land off High	ghland Drive and Knox Road, Loughborough	
EDCLP/228 Haddon Way Residents Association	 More than 400m from a bus stop and lack of service, new route should be funded and trialled by developers Distance from any major roads to access road network Infrastructure delivery plan is dated and should be produced in combination with the Local Plan as it's just as important Infrastructure delivery plan is to be prepared to understand what is required to support development, but infrastructure is required to support development not simply understanding this Need to look at Borough as a whole over next 100+ years, piecemeal development doesn't provide infrastructure Infrastructure needs providing where needed and before housing developed with penalties for not providing 1000 dwellings proposed to south Loughborough, away from bus services, schools oversubscribed, no medical facilities Current residents require infrastructure and facilities, the plan makes no mention of this 	Sustainable transport options are an important aspect of ensuring development is accessible and developers can be requested to fund bus services if necessary. Access to the wider highway network for development will be further assessed. Infrastructure provision is a vital feature in providing sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. The infrastructure delivery plan will be updated identify when, where and how the requirements will be met. Large scale development can take many years to deliver, smaller developments can deliver in a shorter timeframe. Charnwood already has 3 large urban extensions proposed, the smaller developments in this plan will supplement that. Viability is another important consideration for delivering the Local Plan, this means it is not always possible to provide infrastructure before the housing that will pay for this. Concerns around current infrastructure provision and the timely provision of new infrastructure are noted and will be further assessed. Planning legislation means that new development cannot be required to correct
EDCLP/252 Leicestershire County Council	 Access to site will require approval of highway authority and developers who maintain Highland Drive/ Knox Road 	existing deficiencies in infrastructure and facilities Highway access is an important aspect of site allocation and will be examined.
	Lane, Loughborough	
DCLP/223-235	Object to HS32 due to loss of amenity (noise, outlook, light)	Allocated sites will seek to ensure that the amenities of existing residents

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Mr Gideon Cumming	 for residents of Rectory Road and Toothill Road Increase in traffic, increase in on-street parking Allocation density should be reduced Historic building should not be demolished Request development is BfL12 Green Status as a minimum Should not expand allocation 	 are protected. Impact on the highway network, including parking, is an important aspect of site selection and will be assessed through further transport modelling and masterplanning. Density seeks to maximise housing provision in urban areas but may be revised at masterplanning stage. The preservation of important heritage assets and BfL will also be considered at the masterplanning stage. The Local Plan seeks to maximise housing provision in urban areas but
DCLP/252 Mr Rich Wilson	 Car parking at breaking point Loss of accommodation for existing businesses will increase commuting and congestion 	there are currently no plans to expand the site. Impact on the highway network, including parking, is an important aspect of site selection and will be assessed through further transport modelling and masterplanning.
DCLP/314 Mr Richard Morris	 Parking at a critical point Potential effects on neighbouring properties due to loss of light, view and privacy Loss of business units 	The Local Plan seeks to preserve existing, good quality employment sites and work is on-going to assess the suitability of sites. Impact on the highway network, including parking, is an important aspect of site selection and will be assessed through further transport modelling and masterplanning. Allocated sites will seek to ensure that the amenities of existing residents
EDCLP/64 Rachel Sadler	 Loss of business space not provided for elsewhere Need to support business in Charnwood to reduce 	 The Local Plan seeks to preserve existing, good quality employment sites and work is on-going to assess the suitability of sites. The Local Plan seeks to preserve existing, good quality employment sites and work is on-going to assess the suitability of sites.
	 commuting Lack of suitable office space in Loughborough Parking and noise issues in neighbourhood Need larger 3 or 4 bed properties in the area Another solution to meet housing demand needed which doesn't damage community cohesion and environment 	Impact on the highway network, including parking, is an important aspect of site selection and will be assessed through further transport modelling and masterplanning. A mix of housing to meet local need is sought by the Local Plan.
EDCLP/80 Historic England	 Potential negative impact on Grade I All Saints Church; development should preserve and enhance the character and appearance of the Conservation Area 	Sites included in the draft plan been assessed as those that best meet the Council's objectives and provide sustainable development. Site selection was informed by evidence, including heritage, and are those sites that best meet the Council's objectives. This will be an important consideration at the design stage.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
DCLP-264 LCC - Education	 New primary school required in Loughborough to accommodate proposed developments Capacity and scope to expand secondary schools in the Loughborough area 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Close to key routes will need to be reflected / considered in any transport assessment work 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
Q8 - LP3 - Housing		
Specific Sites – Se		
	Farm/Manor Farm, Anstey	
DCLP/256 Vale Planning Consultants	 Single land ownership which is deliverable and achievable to provide sustainable development Suitable highway access can be provided, and work is ongoing to demonstrate impact on strategic network Work ongoing on biodiversity gain, drainage strategy, landscape, visual impact and archaeology to inform masterplanning 	Sites included in the draft plan been assessed as those that best meet the Council's objectives and supporting information is welcomed.
EDCLP/163 Liz Hawkes Anstey Parish Council	 Recognise further development required in the parish but do not support site allocation Neighbourhood plan is in preparation and any allocation would not take this into account 	Site selection was informed by evidence and are those sites that best meet the Council's objectives. The neighbourhood plan is in the early stages of preparation and has limited weight; however, its evidence base and any consultation responses can be considered as the Local Plan is prepared.
EDCLP/169 Mrs Angela McNamee	 Traffic already too busy, with long queues Local facilities can't cope and there are parking issues Development will destroy greenspace between Anstey and Newtown Linford Water pressure insufficient Flooding and ecology issues 	 Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. Site selection has been informed by evidence including on settlement coalescence, flood risk and biodiversity and are those that best meet the Council's objectives. This will be reviewed in light of representations received.
DCLP-264 LCC Education	 2 primary schools in Anstey with some flexibility and it is expected growth could be accommodated Secondary school capacity in Anstey but catering for significant current developments creating capacity issues in next 10 years; potential to accommodate proposed development 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252	 Potential impact on Bradgate Road and The Nook, and 	Impact on the highway network is an important aspect of site selection

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Leicestershire County Council	strategic road network will need to be considered	and will be assessed through further transport modelling.
DCLP/261 Edward Argar MP	 Concerns over impact of further development in at Anstey, which has seen significant development in recent years. 	Site selection was informed by evidence and are those sites that best meet the Council's objectives.
HS51 - Albion Stre	et/Roseberry Street, Anstey	
EDCLP/163 Liz Hawkes Anstey Parish Council	 Recognise further development required in the parish but do not support site allocation Neighbourhood plan is in preparation and any allocation would not take this into account 	Site selection was informed by evidence and are those sites that best meet the Council's objectives. The neighbourhood plan is in the early stages of preparation and has limited weight; however, its evidence base and any consultation responses can be considered as the Local Plan is prepared.
DCLP-264 LCC Education	 2 primary schools in Anstey with some flexibility and it is expected growth could be accommodated Secondary school capacity in Anstey but catering for significant current developments creating capacity issues in next 10 years; potential to accommodate proposed development 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
DCLP/261 Edward Argar MP	 Concerns over impact of further development in at Anstey, which has seen significant development in recent years. 	Site selection was informed by evidence and are those sites that best meet the Council's objectives.
HS52, HS53 & HS5	4 - 84 Melton Road; Land south of Melton Road; Land north of Me	elton Road, Barrow upon Soar
EDCLP/95 Barrow Upon Soar Parish Council	 Does not support sites allocated; concerns relating to overall development strategy and infrastructure capacity 2016 Sileby & Barrow upon Soar Transport Study identified junction capacity to be exceeded with existing development; all sites will add further loading Sites are considerable distance from services increasing use of unsustainable modes of travel Sites have medium overall landscape sensitivity 	 The development strategy and site selection are informed by evidence and are those that best meet the Council's objectives. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. Impact on the highway network is important to site selection and will be assessed through further transport modelling. Site selection was informed by evidence, including access to services and landscape sensitivity
DCLP-264 LCC Education	 Primary school does not have capacity and cannot expand; new school required but insufficient numbers from sites Cumulative effect of developments in Cossington, Barrow and Sileby would require further expansion 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
	Road, Barrow upo Soar	
EDCLP/151 Thomas Taylor Planning Ltd obo Mr W Murdoch	 Support development strategy and site allocated but should be amended to "up to" to reflect site constraints Sustainable location with range of services and facilities. Provides smaller-scale development on previously 	Sites included in the draft plan are assessed as those that best meet the Council's objectives and supporting information is welcomed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	developed land without harm to the environment character or appearance of the area	
HS53 - Land south	of Melton Road, Barrow upon Soar	
EDCLP/152 Adam Murray Andrew Granger & Co Ltd obo landowner clients	 Represent site landowners and support spatial strategy Barrow upon Soar is a sustainable location with a good services and facilities and good public transport links Support allocation which is deliverable and developable with no known physical/environmental and developer interest Technical reports will contribute towards a masterplan Willing to work with CBC to prepare an appropriate site specific policy 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and supporting information is welcomed.
EDCLP/95 Barrow Upon Soar Parish Council	 Site separated from built-up area by Seagrave Nurseries and poorly related to townscape; wildlife corridors along boundaries 	Site selection was informed by evidence, including landscape and ecology, and are those sites that best meet the Council's objectives.
HS54 - Land north	of Melton Road, Barrow upon Soar	
EDCLP/95 Barrow Upon Soar Parish Council	 Site separated from built-up area by Millennium Park and poorly related to townscape; wildlife corridors along boundaries Loss of grassland and impact on woodland Consent for direct access to Millennium Park will not be given 	Site selection was informed by evidence, including landscape and ecology, and are those sites that best meet the Council's objectives.
EDCLP/246 Andrew Collis Gladman Developments Ltd	 Suggest increased capacity to 135 dwellings Site is available and supported by detailed, up-to-date technical information showing developability and how site could be delivered Sustainable location; however, subject to environmental, infrastructure and built environment constraints which can be addressed Can be delivered within 5 years 	Sites included in the draft plan been assessed as those that best meet the Council's objectives and supporting information is welcomed.
HS55 - Leicester R		
DCLP-264 LCC-Education	 Primary school has minor capacity Secondary school at capacity and difficult to extend due to current configuration increasing cost 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	No shared boundary, to rear of existing properties	Highway access is an important aspect of site allocation and will be examined.
HS56 - Loughboro		
EDCLP/258 Sam Heaton	 Site allocated in Neighbourhood Plan but other smaller sites such as Armston Road ignored which has no known 	Sites were assessed across a number of categories which were given weight in accordance with the Council's key principles to achieve the

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Heaton Planning on behalf of Swithland Homes Ltd	constraints preventing development	most appropriate mix of sites to meet our development strategy.
DCLP-425-470 Environment Agency	 Raise concerns over flood flow routes; areas of Flood Zone 3a and Flood Zone 2 within site; flood risk assessment required 	Site selection has been informed by flood risk evidence but will be reviewed in light of representation.
DCLP-264 LCC - Education	 Primary school unable to expand and transport to other locations would be required, in addition to S106 funds Secondary school at capacity and difficult to extend due to current configuration increasing cost 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Site adjacent to A6 and new access onto this may be restricted Adjacent roundabout can experience congestion 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS57 & HS58 - Lai	nd south of Rothley; Land at Woodcock Farm, Rothley	
DCLP/194 Miss Shirley Dixon	 Sites will result in loss of green space Roads and services unable to cope Rothley had had a large amount of development, figures for "Other Settlements" are low 	Site selection was informed by evidence, including landscape and settlement separation, and are those sites that best meet the Council's objectives. Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs. Sites included in the draft plan are assessed as those that best meet the Council's development strategy.
EDCLP/10 Mrs G Allen	 Broadnook will impact on Rothley and additional housing will reduce rural character Potential flooding from run-off 	Site selection was informed by evidence, including settlement separation and flooding, and are those sites that best meet the Council's objectives
EDCLP/86 Rothley Parish Council	 Support Core Strategy Inspector in that planned levels of provision have been met in Service Centres Additional houses will adversely impact on historic character and area of separation Lack infrastructure including roads, schools and healthcare 	The draft plan represents a new development plan which will update and replace the Core Strategy Site selection was informed by evidence, including landscape and settlement separation, and are those sites that best meet the Council's objectives. Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
		Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
	of Rothley, Rothley	
EDCLP/145 Infraland EDCLP/243 Infraland (duplicate)	 Support allocation of site for 44 homes Rothley has good range of services and facilities available and support allocation as a Service Centre Site has no constraints and is suitable available and achievable and can be delivered within 5 years 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and supporting information is welcomed.
EDCLP/173 Rothley CE Academy	 Object to allocations due to lack of improvements to school for additional pupils School and LCC currently working to deliver an extension 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/158 Mrs J. Brettle- West	 Additional houses will adversely impact on historic character and area of separation Lack infrastructure including roads, schools and healthcare Housing mix should provide for elderly and starter homes 	Site selection was informed by evidence, including landscape and settlement separation, and are those sites that best meet the Council's objectives.
	 Support Core Strategy Inspector in that planned levels of provision have been met in Service Centres 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
		Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
		The draft plan represents a new development plan which will update and replace the Core Strategy
DCLP-425-470 Environment Agency	 Site within 250m of Authorised Landfill site 	Allocated sites will seek to ensure that the amenities of people who will live in new developments are protected.
DCLP-264 LCC - Education	 Primary school provision could be problematic and cannot extend on current site but looking for further expansion Secondary provision - Rawlins at capacity and difficult to extend due to current configuration increasing cost; capacity at Cedars will be affected by Broadnook development. 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
HS58 - Land at Wo	odcock Farm, Rothley	A
EDCLP/58 Rothley CE Academy	 Object to allocations due to lack of improvements to school for additional pupils School and LCC currently working to deliver an extension 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/158 Mrs J Brettle- West	 Additional houses will adversely impact on historic character and area of separation Lack infrastructure including roads, schools and healthcare 	Site selection was informed by evidence, including landscape and settlement separation, and are those sites that best meet the Council's objectives.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 Housing mix should provide for elderly and starter homes Support Core Strategy Inspector in that planned levels of provision have been met in Service Centres 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
		Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
		The draft plan represents a new development plan which will update and replace the Core Strategy.
DCLP-264 LCC - Education	 Object to allocations due to lack of improvements to school for additional pupils School and LCC currently working to deliver an extension 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 Adjacent to A6 which will need to be considered in transport assessment work 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS59 - HS64 - Sile	by Sites	
EDCLP/55 Sileby Parish Council	 Do not consider right sites are allocated having regard to strategy and SA Strongly oppose HS64 which is outside the neighbourhood plan's settlement limits and contrary to Policy G1 Sileby NP examined and supported at referendum and considered housing in context of emerging Local Plan; it exceeds housing targets, allocates Reserve Sites and has support of local community Sileby allocations are 39% of Service Centre requirement HS64 was assessed during Sileby NP preparation and not considered appropriate for allocation as a sustainable site and no changes were recommended by the Examiner; allocation ignores the plan HS64 was refused by CBC and appeal was dismissed; Inspector recognised the significant amount of development at Sileby Previous objections to the site remain relevant including impact on countryside, highway concerns, and significant housing development already taken place in Sileby SA does not provide detail of why Sileby has so many allocations and why HS64 was allocated HS64 will undermine local confidence in planning Allocations should be more evenly distributed across 	Sites were assessed across a number of categories, informed by evidence. These were given weight in accordance with the Council's key principles to achieve the most appropriate mix of sites to meet our development strategy. The Sileby NP was produced before the current draft Local Plan was published and whilst acknowledging the overall policy direction does not fully reflect the most recent provision in terms of the development strategy and site allocation. The draft plan represents a new development plan which will update and replace the Core Strategy. Appeals have been determined against the current development plan which will be replaced. The plan only allocates sites which are available and have been put forward for development. This, along with other constraints, can prevent a more even distribution of housing, including to higher order urban areas.
	Allocations should be more evenity distributed across Service Centres utilising small sites which better integrate	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 Other Sileby NP reserve sites not allocated should be allocated before HS64 If insufficient sustainable sites in Service Centres then residual hosuing should be focussed on higher order urban areas 	
HS59 - Factory at	corner of Park Road and Seagrave Road, Sileby	
DCLP-264 LCC - Education	 Primary – Redlands expansion potential is limited; Highgate expansion to accommodate current development, cannot be expanded further creating potential issues Secondary - cumulative effect of developments in require additional places, further expansion would need to be discussed with Academy sponsor. 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/240 Tim Coleby Stantec obo Barwood Development Securities Ltd (Sileby)	 Site is not available, viable or developable as it is an active employment site and no evidence the owners are willing to redevelop Loss would harm local economy Potential site contamination and remediation required No assessment whether conversion to residential use possible 	Sites included in the draft plan been assessed as those that best meet the Council's objectives. Work is on-going to assess the deliverability of sites.
HS60 - Land at rea	r of The Maltings site, High Street, Sileby	
EDCLP/80 Historic England	 The Maltings is Grade II listed, within the Conservation Area with potential impact upon the setting of the Grade II* Church of St Mary to the north 	Site selection was informed by evidence, including potential impact on the historic environment.
EDCLP/240 Tim Coleby Stantec obo Barwood Development Securities Ltd (Sileby)	 Site is not available, viable or developable as it is an active employment site and no evidence the owners are willing to redevelop Low lying land adjacent to Sileby Brook, partly in Flood Zone 2/3 No evidence of developer interest Previous permission not implemented suggesting viability issues 	Site selection was informed by evidence, including flooding, and are those sites that best meet the Council's objectives. Work is on-going to assess the deliverability of sites.
DCLP-425-470 Environment Agency	 Site at risk of flooding, flood risk assessment required Easement required for maintenance and access 	Site selection was informed by evidence, including flooding, and are those sites that best meet the Council's objectives.
DCLP-264 LCC - Education	 Primary – Redlands expansion potential is limited; Highgate expansion to accommodate current development, cannot be expanded further creating potential issues Secondary - cumulative effect of developments in require additional places, further expansion would need to be discussed with Academy sponsor 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
HS61 - 36 Charles	Street, Sileby	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/240 Tim Coleby Stantec obo Barwood Development Securities Ltd (Sileby)	 Site is not available, viable or developable as it is an active employment site and no evidence the owners are willing to redevelop Loss would harm local economy Access improvements required which may not be deliverable Potential site contamination and remediation required No assessment whether conversion to residential use possible Previous permission not implemented suggesting viability issues 	Site selection was informed by evidence and are those sites that best meet the Council's objectives. Work is on-going to assess the deliverability of sites and any potential constraints.
DCLP-264 LCC - Education	 Primary – Redlands expansion potential is limited; Highgate expansion to accommodate current development, cannot be expanded further creating potential issues Secondary - cumulative effect of developments in require additional places, further expansion would need to be discussed with Academy sponsor 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
HS62 - 9 King Stre	eet, Sileby	
EDCLP/80 Historic England	Within Conservation Area and adjacent Grade II No. 7 King Street	Site selection was informed by evidence, including potential impact on the historic environment.
EDCLP/96 Marrons on behalf of UCR Construction and Development Ltd	 Support development strategy and Sileby as a Service Centre with appropriate amount of development Number of dwellings should be a minimum Allocation does not conform with landownership details, cuts through client's land and includes other owners; should be amended to include No.7 King Street 7 King Street, Grade II listed is vacant and at risk Wording of Draft Policy LP24 should be amended to refer to optimum viable use and not public use 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and supporting information is welcomed. Work is on-going to assess the sites and boundary details will be checked.
EDCLP/240 Tim Coleby Stantec obo Barwood Development Securities Ltd (Sileby)	 Site is not available, viable or developable as it is an active employment site and no evidence the owners are willing to redevelop, and occupiers recently signed 10 year lease Loss would harm local economy Multiple owners with no evidence of interest in development Access improvements required which may not be deliverable Potential site contamination and remediation required No assessment whether conversion to residential use possible Potential amenity issues due to location near railway 	Site selection was informed by evidence and are those sites that best meet the Council's objectives. Work is on-going to assess the deliverability of sites and any potential constraints.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
DCLP-264 LCC - Education	 Primary – Redlands expansion potential is limited; Highgate expansion to accommodate current development, cannot be expanded further creating potential issues Secondary - cumulative effect of developments in require additional places, further expansion would need to be discussed with Academy sponsor 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
HS63 - Kendal Ro		
EDCLP/240 Tim Coleby Stantec obo Barwood Development Securities Ltd (Sileby)	 Site is not available, viable or developable as it is an active employment site and no evidence the owners are willing to redevelop, and occupiers recently signed 10 year lease Half of site covered by National Forest Inventory Map No highway frontage or access rights 	Site selection was informed by evidence and are those sites that best meet the Council's objectives. Work is on-going to assess the deliverability of sites and any potential constraints.
DCLP-264 LCC - Education	 Primary – Redlands expansion potential is limited; Highgate expansion to accommodate current development, cannot be expanded further creating potential issues Secondary - cumulative effect of developments in require additional places, further expansion would need to be discussed with Academy sponsor 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/252 Leicestershire County Council	 No shared boundary with public highway 	Highway access is an important aspect of site allocation and will be examined.
HS64 - Land off B	arnards Drive, Sileby	
EDCLP/252 Leicestershire County Council	 No shared boundary with public highway 	Highway access is an important aspect of site allocation and will be examined.
EDCLP/187 Jim Smith	 Service Centres have had disproportionate number of dwellings built this century without sufficient amenities and facilities At recent inquiry the Inspector noted the disproportionate level of housing in Sileby Outside development envelope, loss of agricultural land and change character of the area 	The draft plan represents a new development plan and distribution of development. This update and replace the Core Strategy and the development strategy it contains. Infrastructure provision is an important aspect of ensuring sustainable development. CBC is in on-going dialogue with infrastructure providers to ensure that there is sufficient provision to meet needs.
		Appeals have been determined against the current development plan which will be replaced. Sites were assessed across a number of categories, informed by evidence such as landscape and ecology, to achieve the most appropriate mix of sites to meet our development strategy.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/246 Andrew Collis Gladman Developments Ltd	 Extensive technical evidence available following previous application Appeal dismissed on matters of policy principle and no technical objections raised Sustainable location without environmental harm Available immediately to contribute to five-year supply 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and supporting information is welcomed.
EDCLP/240 Tim Coleby Stantec obo Barwood Development Securities Ltd (Sileby)	 Not suitable for housing due to location on sloping land, adjacent to Sileby Brook in higher landscape sensitivity 	Sites were assessed across a number of categories, informed by evidence such as landscape and flood risk, to achieve the most appropriate mix of sites to meet our development strategy.
DCIP-425-470 Environment Agency	 Adjacent to non-main River and advise no encroachment and blue green corridor should be maintained EA project underway examining multibenefit interventions to improve brook environmentally and reduce flooding May increase pressure on brook but offers opportunity for benefits Contains Flood Zone 2 & 3; requires flood risk assessment 	Site selection has been informed by ecological and flood risk evidence but will be reviewed in light of representation. Benefits can be considered at the masterplanning stage.
DCLP-264 LCC - Education	 Primary – Redlands expansion potential is limited; Highgate expansion to accommodate current development, cannot be expanded further creating potential issues Secondary - cumulative effect of developments in require additional places, further expansion would need to be discussed with Academy sponsor 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
EDCLP/233 Billy Richards	 Contradicts previous appeal decision and does not use the Sileby NP 	The draft plan represents a new development plan which will update and replace the Core Strategy. Appeals have been determined against the current development plan which will be replaced. The Sileby NP was produced before the current draft Local Plan was published and whilst acknowledging the overall policy direction does not fully reflect the most recent provision in terms of the development strategy and site allocation.
Q8 - LP3 - Housing Specific Sites – S	•	
HS38 - Land off Fa	airway Road, Shepshed	
EDCLP/257 West	Raise concern over the impact of additional housing in Shepshed due to:	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.
Leicestershire Clinical	 Significant increase in patients from recent developments in both Shepshed surgeries. 	CBC has been in contact with the CCG to identify issues with provision

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Commissioning Group	 Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	which will form an important factor in determining the distribution of development across the Borough.We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/202 EDCLP/202 Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	 Sites on the urban fringe have limited access to services and facilities. SA scores sites at HS43 Ingleberry Rd and HS46 Iveshead Rd worse than Land south of Ashby Rd Central in some categories and are less sustainable HS38 (PSH24) Land off Fairway Rd not included in the SA clearly constrained by access, proximity to the M1 (noise), topography, trees and landscape. Loss of this greenfield site is unsustainable. Ashby Rd Central better related to urban area, logical extension to settlement limits and more sustainable. Provides details of smaller site at Ashby Road Central than assessed for allocation (PSH436 & PSH138) removing constraints. Site is sustainable location and is suitable, available, and achievable; can be delivered upon allocation. 	Sites were assessed through the SA across a number of categories which were given weight in accordance with the Council's key principles on the environment and access. Any newly submitted sites and information will be assessed for allocation in the plan as we seek to achieve the most appropriate mix of sites to meet our development strategy.
DCLP-425-470 Environment Agency	 Site within 250m of three Environment Agency permit sites and development may be adversely affected by amenity issues (Shepshed Feed Mill, Newhurst Recovery Facility and Morris Recycling Limited). Aware of odour and noise issues at Shepshed Feed Mill. 	Allocated sites will seek to ensure that the amenities of people who will live in new developments are protected.
DCLP-264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
DCLP-268 Forest House Surgery, Shepshed	 Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	 education department. Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision. This will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/215 Lynet te Swinburne Savills obo Trustees of Garendon Estate	 NPPF requires sustainable development HS38 in the ownership of client, working with to identify development partners Site well related to Shepshed, Flood Zone 1, no heritage designations Suitable, available and achievable, deliverable within the first five years 	Sites included in the draft plan been assessed as those that best meet the Council's objectives and supporting information is welcomed.
EDCLP/252 Leicestershire County Council	 Identifies congestion on A512 between Shepshed and the M1 Junction 23 especially during peak hours 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
DCLP/302 Mr David Higgs	 HS38 more use as industrial area than housing, as adjacent to the motorway and industrial units. 	Site selection was informed by evidence but will be reviewed in light of information received from this consultation.
EDCLP/34 Cllr Mary Draycott	 2074 new homes is not acceptable in Shepshed given recent completions and commitments Adjacent land uses (animal feed factory, M1, incinerator) will impact on site in terms of noise, air quality and odour 	Site selection was informed by evidence but will be reviewed in light of information received from this consultation.
EDCLP/80 Historic England	 Comments and studies on Garendon Park allocation relevant Areas of formal planting remaining to the south of the proposed site should be incorporated 	Site selection was informed by evidence but will be reviewed in light of information received from this consultation
EDCLP/89 Biffa	 Newhurst Quarry Energy Recovery Facility implemented and an Environmental Agency permit issued in close proximity to the two housing allocations which should be taken into account and not impact upon operation 	Site selection was informed by evidence but will be reviewed in light of information received from this consultation
EDCLP/183 J.N. Bilsbrough	 Over-development of town affecting existing infrastructure and amenities unable to cope with current residents Access issues with use of existing junction 	Infrastructure provision is recognised as an important component of sustainable development and we are in on-going dialogue with infrastructure providers. An increased population could support provision of additional amenities.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
		Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS39 – Land at Ti	ckow Lane, Shepshed (Phase 2)	
EDCLP/224 Paul Newton	 How will the joint biodiversity strategy work if developments in proximity to Black Brook occur piecemeal 	Developers will be required to evidence such a strategy at planning application stage.
EDCLP/257 West Leicestershire Clinical Commissioning Group	 Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough.We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
DCLP-264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
DCLP-425-470 Environment Agency	Maintenance and emergency access to Black Brook required	Noted - Access can be considered at the masterplanning stage.
EDCLP/192 Severn Trent Water	 Need better certainty of growth proposals at Shepshed and potential timelines to develop strategic solution 	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses.
	Additional housing in Shepshed area will add pressure to	Health care provision is recognised as a vital infrastructure requirement

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Forest House Surgery, Shepshed	 the surgery's Primary Care Services as default practice for patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/215 Lynet te Swinburne Savills obo Trustees of the Grace Dieu & Longcliffe Estates	 NPPF requires sustainable development Site in ownership of client who are working on planning application and a full range of technical work has been undertaken Note the requirement for "<i>a jointly produced biodiversity strategy</i>" and support inclusion of a policy criterion on biodiversity but need flexibility Site is suitable, available and achievable and is deliverable within the first five years of the plan 	Sites included in the draft plan been assessed as those that best meet the Council's objectives and supporting information is welcomed.
HS40 – 32 Charnw	vood Road, Shepshed	
EDCLP/257 West Leicestershire Clinical Commissioning Group	 Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
DCLP – 264	 Only 1 of 4 primary schools in Shepshed potential to 	Education provision is recognised as an important component of

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
LCC - Education	 expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	sustainable development and we are in on-going dialogue with LCCs education department. We will be taken this into account during site selection.
DCLP-268 Forest House Surgery, Shepshed	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/252 Leicestershire County Council	Charnwood Road is a key route into Shepshed District Centre and site abuts the District Centre boundary.	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
	t of Tickow Lane, Shepshed	
EDCLP/224 Paul Newton EDCLP/146 Woodland Trust EDCLP/257 West Leicestershire Clinical Commissioning Group	 How will the joint biodiversity strategy work if developments in proximity to Black Brook occur piecemeal Concern several site allocations listed are adjacent to ancient woodland and may have adverse impacts Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. 	 Developers will be required to evidence such a strategy at planning application stage. Site selection has been informed by ecological evidence but will be reviewed in light of representation. Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
	CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	ensure a joined approach towards future development across the Charnwood area.	
EDCLP/192 Severn Trent Water	Need better certainty of growth proposals at Shepshed and potential timelines to develop strategic solution	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses
DCLP-425-470 Environment Agency	 Site includes flood zone 2 and flood risk assessment will be required Maintenance and emergency access to Black Brook necessary Opportunities exist to restore the Brook and provide multibenefit interventions. Early engagement with a wider stakeholder group could benefit the development. 	Site selection has been informed by ecological and flood risk evidence but will be reviewed in light of representation. Noted – Access and other benefits can be considered at the masterplanning stage.
DCLP-264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
DCLP-268 Forest House Surgery, Shepshed	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough.
	Staff recruitment difficult	We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
	akley Road, Shepshed	
EDCLP/224 Paul Newton	 How will the joint biodiversity strategy work if developments in proximity to Black Brook occur piecemeal 	Developers will be required to evidence such a strategy at planning application stage.
EDCLP/248 Sam Pepper DLP Planning Ltd on behalf of Gloebal Ltd	 Support allocation of HS42 and provides additional information and a planning application being prepared Site is a sustainable location with good access to public transport, education, employment and other local facilities and services. 	Sites included in the draft plan been assessed as those that best meet the Council's objectives and supporting information is welcomed.
EDCLP/248 Sam Pepper DLP Planning Ltd on behalf of	 Additional comments - Support principle of allocation but note inconsistencies in policies map with amount of land allocated for housing and open space in comparison to nearby sites 	Sites included in the draft plan been assessed as those that best meet the Council's objectives and supporting information is welcomed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Gloebal Ltd EDCLP/257 West Leicestershire Clinical	 Allocation has restricted amount of developable land as flood zones not allocated as open space, it should correspond to imminent planning application Scheme for 204 homes can be accommodated on site, policy should be amended accordingly Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision
Commissioning Group	 Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. 	which will form an important factor in determining the distribution of development across the Borough.
	 Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
DCLP-425-470 Environment Agency	Opportunities to restore Black Brook and provide multibenefit interventions. Early engagement with a wider stakeholder group could benefit the development.	Noted – Benefits can be considered at the masterplanning stage.
EDCLP/192 Severn Trent Water	Need better certainty of growth proposals at Shepshed and potential timelines to develop strategic solution	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses
DCLP-264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
DCLP-268 Forest House	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Surgery, Shepshed	 patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/215 Lynet te Swinburne Savills obo Trustees of the Grace Dieu & Longcliffe Estates	 NPPF requires sustainable development Site in ownership of client who are working with a developer on planning application (P/19/2436/2) Site is well related to Shepshed, has lowest risk of flooding, no heritage designations Note the requirement for "a jointly produced biodiversity strategy" and support inclusion of a policy criterion on biodiversity but need flexibility Site is suitable, available and achievable and is deliverable within the first five years of the plan 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and additional supporting information is welcomed.
	of B591/Ingleberry Road & north of Iveshead Road, Shepshed	
DCLP/302 Mr David Higgs	 Site is remote from Shepshed and will be adjacent to proposed incinerator Will encourage development of adjacent land 	Site selection was informed by evidence and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation.
DCLP/342 Dr Anthony Kay	 HS43 does not meet policy of "urban concentration and intensification" and is detached from built area of Shepshed. Difficult to link by sustainable transport 	Site selection was informed by evidence and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation.
EDCLP/80 Historic England	 Previous comments and studies in relation to Garendon Park development should be referred to. 	Site selection was informed by evidence but will be reviewed in light of information received from this consultation
EDCLP/89 Biffa	 Newhurst Quarry Energy Recovery Facility implemented, and an Environmental Agency permit issued in close proximity to the two housing allocations which should be taken into account and not impact upon operation 	Site selection was informed by evidence but will be reviewed in light of information received from this consultation
EDCLP/257 West	Raise concern over the impact of additional housing in Shepshed due to:	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.
Leicestershire Clinical	Significant increase in patients from recent developments in both Shepshed surgeries.	CBC has been in contact with the CCG to identify issues with provision
Commissioning Group	 Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. 	which will form an important factor in determining the distribution of development across the Borough.
	 Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which 	We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. 	
	CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020.	
	CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area.	
EDCLP/202 Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	 Sites on the urban fringe have limited access to services and facilities. SA scores sites at HS43 Ingleberry Rd and HS46 Iveshead Rd worse than Land south of Ashby Rd Central in some categories and are less sustainable HS38 (PSH24) Land off Fairway Rd not included in the SA clearly constrained by access, proximity to the M1 (noise), topography, trees and landscape. Loss of this greenfield site is unsustainable. Ashby Rd Central better related to urban area, logical extension to settlement limits and more sustainable. Provides details of smaller site at Ashby Road Central than assessed for allocation (PSH436 & PSH138) removing constraints. Site is sustainable location and is suitable, available, and achievable; can be delivered upon allocation. 	Sites were assessed through the SA across a number of categories which were given weight in accordance with the Council's key principles on the environment and access. Any newly submitted sites and information will be assessed for allocation in the plan as we seek to achieve the most appropriate mix of sites to meet our development strategy.
DCLP-425-470 Environment Agency	• Site in close proximity to two Environment Agency permit sites and development may be adversely affected by amenity issues (Newhurst Recovery Facility and Morris Recycling Limited).	Allocated sites will seek to ensure that the amenities of people who will live in new developments are protected.
DCLP-264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
DCLP-268 Forest House	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Surgery, Shepshed	 patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/247 Fisher German obo Mr S W Taylor and Mr P A Taylor	 Support allocation of HS43 and provide additional information Site is within walking distance of services and facilities and employment Site is suitable, available and achievable and can be delivered within 5 years. SA generally supported, additional evidence provided to amend scores where appropriate 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and the additional supporting information is welcomed.
EDCLP/252 Leicestershire County Council	 A512 can experience congestion Site remote from Shepshed, facilities and Shepshed District Centre on opposite side of the A512. Challenge for walking, cycling and public transport connectivity. Access onto the B591 may be restricted by policy 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
EDCLP/252 Leicestershire County Council	 Adjacent to two approved waste management sites; Newhurst Quarry incinerator and a waste transfer station 	Allocated sites will seek to ensure that the amenities of people who will live in new developments are protected.
	n of Hallamford Road & west of Shepshed, Shepshed	1
EDCLP/224 Paul Newton	 How will the joint biodiversity strategy work if developments in proximity to Black Brook occur piecemeal 	Developers will be required to evidence such a strategy at planning application stage.
DCLP/302 Mr David Higgs	Site is remote and almost a new settlement	Site selection was informed by evidence and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation.
DCLP/342 Dr Anthony Kay	 HS44 does not meet policy of "urban concentration and intensification" Site represents major intrusion into landscape beyond settlement boundary Poorly related to Shepshed centre, difficult to link by sustainable transport 	Site selection was informed by evidence, including landscape, and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation.
EDCLP/215 Lynette Swinburne Savills obo Trustees of the	 NPPF requires sustainable development Site in ownership of client who are working to identify a developer partner No technical difficulties have been identified for the site 	Sites included in the draft plan have been assessed as those that best meet the Council's objectives and additional supporting information is welcomed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Grace Dieu & Longcliffe Estates EDCLP/257 West Leicestershire Clinical Commissioning Group	 Site has no flooding, heritage or biodiversity issues Site is suitable, available and achievable and is deliverable within the first five years of the plan Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
DCLP-425-470 Environment Agency	Opportunities to restore Black Brook and provide multibenefit interventions. Early engagement with a wider stakeholder group could benefit the development.	Noted – Benefits can be considered at the masterplanning stage.
EDCLP/192 Severn Trent Water	Need better certainty of growth proposals at Shepshed and potential timelines to develop strategic solution	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses
DCLP-264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
DCLP-268 Forest House Surgery,	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.
Shepshed	Currently surgery would require expansion of space and	CBC has been in contact with the CCG to identify issues with provision

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	 which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/252 Leicestershire	 Site is separated from Shepshed and remote Significant development in more rural areas will require 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
County Council	mitigation	and win be accorded through farmer transport modeling.
	 Challenge for walking, cycling and public transport connectivity 	
HS45 – 20 Moscov	w Lane, Shepshed	
DCLP/302 Mr David Higgs	Site is remote and almost a new settlement	Site selection was informed by evidence and are those that best meet the Council's objectives. They will be reviewed in light of information received from this consultation.
DCLP/401 Mr. Alan Holland	 Access not shown and access via Moscow Lane would raise safety issues for pedestrians and vehicles 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
EDCLP/257 West Leicestershire Clinical Commissioning Group	 Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
DCLP-268 Forest House Surgery,	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Shepshed	 Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/252 Leicestershire County Council	 A512 can experience congestion Moscow Lane is rural in nature and may require mitigation measures Site remote from Shepshed, facilities and Shepshed District Centre on opposite side of the A512. Challenge for walking, cycling and public transport connectivity. Access onto the B591 may be restricted by policy 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
HS46 – Land rear	of 62 Iveshead Road, Shepshed	
EDCLP/257 West Leicestershire Clinical Commissioning Group	 Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/202 Planning and Design Group (UK) Limited obo	 Sites on the urban fringe have limited access to services and facilities. SA scores sites at HS43 Ingleberry Rd and HS46 Iveshead Rd worse than Land south of Ashby Rd Central in some 	Sites were assessed through the SA across a number of categories which were given weight in accordance with the Council's key principles on the environment and access.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
GC No 37 Limited (Godwin Developments)	 categories and are less sustainable HS38 (PSH24) Land off Fairway Rd not included in the SA clearly constrained by access, proximity to the M1 (noise), topography, trees and landscape. Loss of this greenfield site is unsustainable. Ashby Rd Central better related to urban area, logical extension to settlement limits and more sustainable. Provides details of smaller site at Ashby Road Central than assessed for allocation (PSH436 & PSH138) removing constraints. Site is sustainable location and is suitable, available, and achievable; can be delivered upon allocation. 	Any newly submitted sites and information will be assessed for allocation in the plan as we seek to achieve the most appropriate mix of sites to meet our development strategy.
DCLP-264 LCC- Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department. We will be taken into account during site selection.
DCLP-268 Forest House Surgery, Shepshed	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
EDCLP/252 Leicestershire County Council	 A512 can experience congestion Moscow Lane is rural in nature and may require mitigation measures Site remote from Shepshed, facilities and Shepshed District Centre on opposite side of the A512. Challenge for walking, cycling and public transport connectivity. 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
	of 54 Iveshead Road, Shepshes	
EDCLP/257 West Leicestershire	 Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development.
Clinical Commissioning Group	 Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. 	CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
DCLP-264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
DCLP-268 Forest House Surgery, Shepshed	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
	ckow Lane, Shepshed	
EDCLP/224 Paul Newton	 How will the joint biodiversity strategy work if developments in proximity to Black Brook occur piecemeal 	Developers will be required to evidence such a strategy at planning application stage.
EDCLP/90 Peter Brett Associates on behalf of Barwood Development Securities Limited	 Represent clients land interest and planning application submitted for HS48 Support allocation through policy LP3 but request removal of requirement for joint biodiversity strategy due to site's separation from Black Brook Pollution control measures can prevent impact on stream on site and Black Brook 	Site selection and requirement for a joint biodiversity strategy has been informed by ecological evidence but will be reviewed in light of representation.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/146 Woodland Trust	 Concern several site allocations listed are adjacent to ancient woodland and may have adverse impacts 	Site selection has been informed by ecological evidence but will be reviewed in light of representation.
EDCLP/257 West Leicestershire Clinical Commissioning Group	 Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.
DCLP – 264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department. We will be taken into account during site selection.
EDCLP/192 Severn Trent Water	 Need better certainty of growth proposals at Shepshed and potential timelines to develop strategic solution 	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses
DCLP-268 Forest House Surgery, Shepshed	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion 	Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/252	 Staff recruitment difficult A512 can experience congestion 	We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future. Impact on the highway network is an important aspect of site selection
Leicestershire County Council	New access onto A512 may be restricted by policy	and will be assessed through further transport modelling.
	shby Road West, Shepshed	
DCLP/302 Mr David Higgs	 Site rises from properties on Brick Kiln Lane causing overlooking and loss of light Access onto A512 would exacerbate congestion 	Allocated sites will seek to ensure that the amenities of neighbouring properties are protected through the planning application process. Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling.
EDCLP/92 Mrs Valerie Greenhill	 No objection in principle but neighbouring properties should be able to comment on proposed housing plans in the future 	The local plan will be the subject of further consultation and any allocated site will require a planning application during which neighbouring properties will be consulted.
EDCLP/106 Claire Toothill	 Objects to the proposed allocation due to: Previous application refused and similar reasons still exist Human ashes laid to rest on the site Neighbouring property lower than the field restricting light which has been a reason for previous refusal nearby Loss of privacy Reduction in value of neighbouring property 	Allocated sites will seek to ensure that the amenities of neighbouring properties are protected through the planning application process. The reduction in property value is not a planning matter.
EDCLP/139 Steve Faulks	 Objects to the proposed allocation due to: Access restrictions on to the A512 at peak periods Elevated plot overlooking and overshadowing existing houses Consequences of rain run-off from elevated site, especially on Brick Kiln Lane Application for a single dwelling on site previously refused due to access, conditions much worse now Infrastructure problems, lacking Drs, schools, unsuitable supermarkets 	 Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. Allocated sites will seek to ensure that the amenities of neighbouring properties are protected through the planning application process. Flood risk is an important consideration during site selection and the planning application process will seek no net increase in runoff. Infrastructure provision is recognised as a vital requirement to ensure sustainable development and Charnwood BC is in on-going dialogue with providers to meet requirements.
EDCLP/257 West Leicestershire Clinical Commissioning Group	 Raise concern over the impact of additional housing in Shepshed due to: Significant increase in patients from recent developments in both Shepshed surgeries. Impact of the approved North Loughborough SUE as both surgeries contracted registration areas cover some of SUE. Both surgery premises require significant investment to accommodate growth, no NHS funds available. 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 One surgery is listed preventing significant development. Local recruitment issues exist with staff shortages which growth could exacerbate. Further development in Shepshed as proposed poses a significant risk for Health Care provision in the area. CCG currently undertaking a Primary Care Estate Review of all surgeries to provide a baseline to inform Primary Care Estate Strategy with first draft strategy scheduled for early 2020. CCG welcome the opportunity to continue to work together to ensure a joined approach towards future development across the Charnwood area. 	benefits from sufficient health care provision in the future.
EDCLP/238 L.Lawson	 More suitable areas for housing exist due to: Increase in traffic on busy road creating danger to users and increasing pollution Loss of light and overshadowing and overlooking Impact on rural character, trees and wildlife Loss of views and property values Land with derelict buildings etc should be used instead. 	 Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. Allocated sites will seek to ensure that the amenities of neighbouring properties are protected through the planning application process. Loss of views and the reduction in property value is not a planning matter. Charnwood BC has sought to identify all suitable brownfield land for development.
DCLP-264 LCC - Education	 Only 1 of 4 primary schools in Shepshed potential to expand but not by places required so new school required Development in Shepshed would require all Garendon SUE secondary places to be accommodated Loughborough Scope to expand Iveshead school to accommodate growth 	Education provision is recognised as an important component of sustainable development and we are in on-going dialogue with LCCs education department.
DCLP-268 Forest House Surgery, Shepshed Q9 - LP4 - Afforda	 Additional housing in Shepshed area will add pressure to the surgery's Primary Care Services as default practice for patient registrations. Currently surgery would require expansion of space and access to S106 money 'up-front' Grade II listed building may restrict expansion Staff recruitment difficult 	 Health care provision is recognised as a vital infrastructure requirement to ensure sustainable development. CBC has been in contact with the CCG to identify issues with provision which will form an important factor in determining the distribution of development across the Borough. We will continue to engage with the CCG to ensure that development benefits from sufficient health care provision in the future.

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If you don't agree	comments on this draft policy? with the proposed policy, please set out why and what alternativ nave missed something?	e approach would you suggest?
DCLP/137 Mr Dennis Marchant	Policy supported but affordable housing required in Small Villages and Hamlets	The support is welcomed. Affordable housing provision is directed towards settlements in the Borough which have at least some services and facilities to meet the day to day needs of residents. Draft Policy LP5 makes provision for affordable housing on rural exception sites to meet an identified local need.
DCLP/195 Miss Shirley Dixon	 Why build affordable housing in Rothley, with high house prices Affordable housing should be focussed on larger towns with better access to facilities 	Affordable housing has a specific definition and seeks to meet the needs of those who's needs are not met by the market, such as affordable homes to rent or discounted market sales housing. There is an affordable housing need across the Borough, not just the larger settlements and the settlement hierarchy seeks to provide meet this need where residents have at least some services and facilities to meet their day to day.
Mr Gideon Cumming DCLP-223-235 G Cumming	 Amend wording from 'seek' to 'require' 	We are obliged by Government to consider viability when planning for affordable housing and to ensure that development is not undeliverable due to excessive policy burdens. Site specifics, such as contamination, may mean that we cannot achieve 30% affordable housing on every site for it to remain viable.
DCLP/258 Vale Planning Consultants	 Requirement acknowledged, 30% seems appropriate and evidenced, subject to viability. Smaller site exemption welcomed but proposed site area of 0.5 ha for exemption does not meet recent case law which indicates a threshold of 1 ha, what is the justification? 	The support is welcomed. The small site definition is derived from the National Planning Policy Framework which defines major development as development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. The Planning Practice Guidance states that planning obligations for affordable housing should only be sought for residential developments that are major developments and quotes the NPPF definition. The threshold will be assessed in the light of recent case law.
DCLP/394 Dr Martin Field	 Supplementary policy needed on how independent viability assessments should be undertaken. All documents should be open to public scrutiny with no confidentiality due to market sensitivity 	Viability assessments must follow the National Planning Guidance which sets out the government's recommended approach to viability assessment for planning. The approach supports accountability for communities by enabling them to understand the key inputs to and outcomes of viability assessment.
LDCLP/02 Anonymous	 30% is right as long as CBC can make it happen 	Charnwood Borough Council will always seek to maximise affordable housing provision; however, site specifics and infrastructure requirements mean that 30% provision may not always be achievable.
LDCLP/22 Anonymous	 30% affordable housing will need an increase in police funding as affordable housing brings with it many problems 	Affordable housing seeks to help people those people in our community whose needs are not met by the market, they are not new members of society.
LDCLP/34	Affordable housing is essential to create contentment and a	Charnwood Borough Council will seek to maximise affordable housing

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Anonymous	sense of belonging.	provision to create a cohesive community.
LDCLP/51 Anonymous	 Use what's already concreted better first 	The Local Plan seeks to prioritise the use of brownfield land and underused land and buildings with a development strategy based on urban concentration and intensification.
EDCLP/34 Cllr Mary Draycott	 Affordable housing is a misleading term as it is not affordable to many people Need to be tough on developers claiming viability issues Priority should be council housing Good quality council housing required 	Affordable housing has a specific definition and seeks to meet the needs of those who's needs are not met by the market, such as affordable homes to rent or discounted market sales housing. Charnwood Borough Council will always seek to maximise affordable housing provision; however, site specifics and infrastructure requirements mean that 30% provision may not always be achievable due to viability. Council owned housing could be provided if that is determined to be the best means of meeting affordable housing need.
EDCLP/52 Shepshed Town Council	 No confidence 30% affordable housing can be provided in Shepshed, can this be shown over the last 5 years Developers need to state finances can support 30% affordable housing before outline planning permission is granted Any affordable housing should be fit for purpose 	 The Local Plan seeks to ensure good quality housing of all tenures. The Borough Council has undertaken an affordable housing viability study which shows that 30% affordable housing is achievable in Shepshed. We are obliged by Government to consider viability when planning for affordable housing and to ensure that development is not undeliverable due to excessive policy burdens. Site specifics, such as contamination, may mean that we cannot achieve 30% affordable housing on every site for it to remain viable. The Local Plan seeks to ensure good quality housing of all tenures.
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	 No objections in principle Concern that there is no differentiation between sub-areas and differences in cost per sqm Assumptions used in the viability assessment appear optimistic eg. S106 contributions per dwelling Estimated GDV is based on optimistic house prices CIL would require lower affordable housing provision Policy should be reviewed to ensure realism and be based on sub-markets 	The Charnwood Affordable Housing Viability Assessment forms a robust evidence base to support the policy. The robustness is reflected in the good track record of delivering 30% affordable housing in Charnwood. There is not sufficient evidence to divide Charnwood into more sub-areas that could be robustly defended if challenged. It is accepted that there are variables within Charnwood, but in a high-level study of this nature, it is necessary to take a relatively simplistic approach.
EDCLP/74 Mr Hussain	 Plan misses salient points to address issues Local authority needs to be multifaceted and multidimensional in its approach to housing Council and housing associations need to take a more 	The Local Plan relates to the planning system and as such relates to the use of land. Whilst the points raised are acknowledged many of them are beyond the realms of the Local Plan alone.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 proactive role in investing and building social housing Private landlords cannot meet social housing needs Policy does not address those currently in housing crisis More efficient and faster means of delivering social housing is required to increase access to home ownership and address housing crisis Environmental damage will be caused by the housing included in the Local Plan and the building of unaffordable homes We are wasting public money destroying the environment through unaffordable house building. People need investing in, not the destruction of the environment 	 The Local Plan seeks to address the housing needs of our community, including those who cannot access market housing, by maximising affordable housing provision within the framework provided by statutory legislation and national guidance. Houses are proposed to meet the identified needs of our community and environmental considerations form an important consideration for the planning process and development should leave the natural environment in a better state than beforehand.
EDCLP/108 Sue Barry	 Affordable housing could be provided by releasing private rental properties to first time buyers Private rental properties are expensive, and some aren't maintained Rent could pay a mortgage 	The Local Plan relates to the planning system and as such relates to the use of land. Whilst the points raised are acknowledged many of them are beyond the realms of the Local Plan. Affordable housing can offer housing for sale or rent to those whose needs are not met by the market. For example, affordable rent is below local market rent and shared ownership properties can offer a route to home ownership.
EDCLP/115 Charnwood Constituency Labour Party	 Propose that 30% of development should be good quality council housing; owned and managed by the authority with affordable rents, secure tenure, good gardens and large community green space 	Council owned housing could be provided if that is determined to be the best means of meeting affordable housing need.
EDCLP/121 Marie Birkinshaw	Convenient public transport must be built in	The location of affordable housing is directed in accordance with the settlement hierarchy which seeks to guide development to those locations where there is a genuine opportunity to walk, cycle or use public transport.
EDCLP/125 Tim Birkinshaw	 Consider obtaining powers to build and acquire more council housing as an option to private renting and owner-occupied 30% social housing should be continued. 	Council owned housing could be provided if that is determined to be the best means of meeting affordable housing need.
EDCLP/130 Lee Perkins	 Propose that 30% of development should be good quality council housing; owned and managed by the authority with affordable rents, secure tenure, good gardens and large community green space 	Council owned housing could be provided if that is determined to be the best means of meeting affordable housing need.
EDCLP/134 RCA Regeneration Limited on behalf of Mr and Mrs	 30% affordable housing requirement should be subject to viability testing Request flexibility on tenure mix reflecting availability of existing affordable housing stock and general demand Support RP partners providing up to date evidence on 	The Charnwood Affordable Housing Viability Assessment forms a robust evidence base to support the 30% requirement and the opportunity for viability assessments is available if a different level of provision is needed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Gamble	demand and looking at re-lets data before determining tenure mix for an individual scheme	The policy does not prevent flexibility and Draft Policy LP6 on housing mix allows a mix of house types, tenures and sizes having regard to housing needs, market conditions, economic viability and site specific circumstances.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 Recognise importance of sustainable communities and campaigns for the provision of affordable homes, especially rural affordable homes 30% affordable housing requirement but composition of provision needs to be clarified and made clearer The ratio of rented to intermediate affordable should be maintained if the 30% allocation is reduced through viability 	Flexibility is provided in the policy itself to allow the mix of types and tenures to respond on a site by site basis to housing needs, market conditions, economic conditions and circumstances.
EDCLP/147 Hoton Parish Council	 384 affordable homes per annum are needed, the total number of homes needed is 1,082 per annum meaning at least 35% of the homes needed are affordable homes and a target of 30% on sites of 10 or more will not achieve this Evidence shows greatest need for rented affordable housing so the preferred percentage of affordable rental vs ownership should be made clear within the policy 	The affordable housing need is calculated using a different methodology to overall need, including supply-side factors influenced by the current stock of affordable housing and its turnover. Planning Practice Guidance recommends that total affordable housing need should be considered in the context of its delivery as a proportion of housing developments. The level of affordable housing required should be realistic and deliverable, it should not prevent sustainable development due to viability concerns. The Charnwood Affordable Housing Viability Assessment forms a robust evidence base to support the 30% requirement. Flexibility is provided in the policy itself to allow the mix of types and tenures to respond on a site by site basis to housing needs, market conditions, economic conditions and circumstances.
EDCLP/163 Liz Hawkes Anstey Parish Council	 Supports the proposal 30% of all new housing in Anstey Parish should be 'affordable'. Section 106 money from Davidsons Gynsill Lane development should be spent within the Anstey parish 	The support is welcomed, please note that the requirement is for developments of 10 dwellings or more in line with national guidance. The allocation of funding received from specific developments is negotiated through the development management process.
EDCLP/165 Dr S.J. Bullman	 Developer is encouraged to split a development into smaller chunks to avoid requirements for affordable housing, the text seeking to prevent this can easily be circumvented Commuted sums should aggregate all small developments to contribute to an overall affordable housing plot The maths are contradictory, a 10-dwelling proposal should include 3 affordable homes – not zero 	National requirements state affordable housing should only be sought for residential developments of 10 or more homes. We are unable to ask for a contribution on developments of less than 10 houses. This has necessitated the reference in the text to ensure comprehensive development which will need to be assessed at the planning application stage. The requirement of 3 affordable homes from a 10 dwelling proposal is correct, it is not zero.
EDCLP/176 Hannah Post	30% figure appears reasonable with sufficient flexibility if not achievable	The support for the policy is welcomed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Barton Willmore obo Michelmersh Brick Holdings Plc	 Consistent with national policy in only seeking contributions on major schemes 	
EDCLP/178 Mark Rose Define obo Bloor Homes	 Support affordable housing provision as part of housing development Critical that viability and deliverability is not compromised, should be considered and evidenced during plan-making Policies that have a cost implication cannot be deferred to a SPD, quantum and mix should be set out in the local Plan itself and clearly evidenced If a higher level of affordable housing is required to address acute affordable housing than can be delivered in proposed developments, then a higher level of overall housing provision should be sought 	The support for the policy is welcomed. The Charnwood Affordable Housing Viability Assessment forms a robust evidence base to support the 30% requirement and the opportunity for viability assessments is available if a different level of provision is needed to ensure deliverability. To be overly prescriptive in terms of mix would prevent a more focussed delivery of affordable housing to meet local need and specific circumstances and to accommodate changes in requirements and products over time. The affordable housing need is calculated using a different methodology to overall need, including supply-side factors influenced by the current stock of affordable housing and its turnover. Planning Practice Guidance recommends that total affordable housing need should be considered in the context of its delivery as a proportion of housing developments. The level of affordable housing required should be realistic and deliverable, it should not prevent sustainable development due to viability concerns nor result in an over-provision of housing overall. The Charnwood Affordable Housing Viability Assessment forms a robust evidence base to support the 30% requirement.
EDCLP/179 Mark Rose Define obo Bloor Homes (HS37)	 Support affordable housing provision as part of housing development Critical that viability and deliverability is not compromised, should be considered and evidenced during plan-making Policies that have a cost implication cannot be deferred to a SPD, quantum and mix should be set out in the local Plan itself and clearly evidenced If a higher level of affordable housing is required to address acute affordable housing than can be delivered in proposed developments, then a higher level of overall housing provision should be sought 	The support for the policy is welcomed. The Charnwood Affordable Housing Viability Assessment forms a robust evidence base to support the 30% requirement and the opportunity for viability assessments is available if a different level of provision is needed to ensure deliverability. To be overly prescriptive in terms of mix would prevent a more focussed delivery of affordable housing to meet local need and specific circumstances and to accommodate changes in requirements and products over time. The affordable housing need is calculated using a different methodology to overall need, including supply-side factors influenced by the current stock of affordable housing and its turnover. Planning Practice Guidance recommends that total affordable housing need should be considered in the context of its delivery as a proportion of housing developments. The level of affordable housing required should be realistic and deliverable, it should not prevent sustainable development due to viability concerns nor result in an over-provision of housing overall. The Charnwood Affordable

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		Housing Viability Assessment forms a robust evidence base to support the 30% requirement.
EDCLP/180 Alex Prowse Astill Planning Consultants obo Mr Fothergill	 Intention not to seek affordable housing contributions from self-build developments is supported due to viability challenges that affordable housing contributions can create 	The support for the policy is welcomed.
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	 Supportive of the requirement for development to deliver affordable housing and the flexibility for viability to justify a different level of provision 	The support for the policy is welcomed.
EDCLP/205 Guy Longley Pegasus obo Davidsons Development Ltd (Anstey)	 Policy needs a flexible approach to take account of other potential requirements associated with development including provision for improved education facilities 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold)	 Policy needs a flexible approach to take account of other potential requirements associated with development including provision for improved education facilities 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Field Head)	 Policy needs a flexible approach to take account of other potential requirements associated with development including provision for improved education facilities 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/209 Amy Smith Pegasus obo Jelsons	 Riggets Green would include policy compliant provision 30% affordable housing and provides the opportunity to meet specific needs from Defence Medical Rehabilitation Centre and should be considered in assessment of alternative options 	Deliverability of a policy compliant scheme is an important consideration for site selection. Sites included in the draft plan been assessed as those that best meet the Council's objectives.
EDCLP/216 Tom Collins Ninteen47 obo Davidsons &	 Policy requirement for 30% affordable housing should be subject to whole-plan viability testing If full affordable housing requirements are not met through the affordable housing accured through this policy, the total 	A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known. The affordable housing need is calculated using a different methodology
Redrow	the affordable housing secured through this policy, the total housing requirement should be increased	to overall need, including supply-side factors influenced by the

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 Support the ability for viability assessments to be undertaken to justify a lower affordable housing contribution 	current stock of affordable housing and its turnover. Planning Practice Guidance recommends that total affordable housing need should be considered in the context of its delivery as a proportion of housing developments. The level of affordable housing required should be realistic and deliverable, it should not prevent sustainable development due to viability concerns nor result in an over-provision of housing overall. The Charnwood Affordable Housing Viability Assessment forms a robust evidence base to support the 30% requirement.
EDCLP/217 Councillor Emma Ward Borough Councillor for Dishley & Hathern	 CBC should hold developers to their pledges for at least 30% affordable homes as part of developments, not just 'seeking' to, and a serious commitment sustainable design 	Support for flexibility in the policy is welcomed. We are obliged by Government to consider viability when planning for affordable housing and to ensure that development is not undeliverable due to excessive policy burdens. Site specifics, such as contamination, may mean that we cannot achieve 30% affordable housing on every site for it to remain viable. The Local Plan seeks to promote sustainable design through Draft Policy LP30.
EDCLP/226 Eleanor Hood	 Policy is too weak in its aim, should not just 'seek' a certain percentage of affordable housing in new developments it should be 'enforced' 	We are obliged by Government to consider viability when planning for affordable housing and to ensure that development is not undeliverable due to excessive policy burdens. Site specifics, such as contamination, may mean that we cannot achieve 30% affordable housing on every site for it to remain viable.
EDCLP/246 Andrew Collis Gladman Developments Ltd	 Confirm draft allocations can accommodate the policy requirement, evidenced through recent planning applications. 	Deliverability of a policy compliant scheme is an important consideration for site selection. Sites included in the draft plan been assessed as those that best meet the Council's objectives.
EDCLP/254 Ian Deverell Turley on behalf of Rainier Developments Ltd)	 Support the HEDNA in assessing, identifying and testing affordable housing provision but must not undermine deliverability 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/255 Ian Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	 Support the HEDNA in assessing, identifying and testing affordable housing provision but must not undermine deliverability 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/258 Sam Heaton Heaton Planning on behalf of Swithland Homes Ltd	 Policy definition for minor development should be amended to that set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 which includes 10 houses or 0.5hectares or more and the number of dwellings is not known 	The definition in the policy reflects that contained in the NPPF Glossary which makes no mention of "the number of dwellings is not known."
EDCLP/182 Pegasus obo David Wilson Homes	 Needs to take a flexible approach to affordable housing provision, taking account of other potential requirements associated with development proposals 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/161 Councillors Gill Bolton and Alice Brennan Shelthorpe Ward	 Threshold of 30% of affordable housing in new developments needs to be applied across the board irrespective of the number of planned properties 	National requirements state affordable housing should only be sought for residential developments of 10 or more homes. We are unable to ask for a contribution on developments of less than 10 houses.
EDCLP/160 Persimmon Homes	• Further clarity required on affordable housing definition and the tenure mix in order to be in-line with national policy	The definition of affordable housing and that provided in the supporting text has been derived from the NPPF but will be reassessed.
EDCLP/253 Ann Irving	 30% threshold for plots bearing 10 or more would seem to be too modest a percentage Much new development in villages is below threshold Affordable in the plan context has a different meaning to smaller, more affordable homes to buy needed in villages; need to build smaller new homes and retain those that exist 	 The Borough Council has undertaken an affordable housing viability study which shows that 30% affordable housing is achievable without compromising on deliverability. National requirements state affordable housing should only be sought for residential developments of 10 or more homes. We are unable to ask for a contribution on developments of less than 10 houses. Draft Policy LP6 seeks to ensure a mix of house types, tenures and sizes to meet local needs. It is very difficult to refuse planning permission for the expansion of smaller housing in villages on the grounds that it should
EDCLP/239 Jonathon Barratt- Peacock	 Affordable housing needs providing in the other settlements, smaller villages and hamlets to ensure a mixed community and replace sold council housing Subsidising bus services would solve transport problems 	be retained to meet local need. Affordable housing provision is directed towards settlements in the Borough which have at least some services and facilities to meet the day to day needs of residents. Draft Policy LP5 makes provision for affordable housing on rural exception sites to meet an identified local need.
EDCLP/239 Vivienne Barratt- Peacock	 Affordable housing needs providing in the other settlements, smaller villages and hamlets to ensure a mixed community and replace sold council housing Subsidising bus services would solve transport problems 	Bus service subsidies are controlled by the County Council. Affordable housing provision is directed towards settlements in the Borough which have at least some services and facilities to meet the day to day needs of residents. Draft Policy LP5 makes provision for affordable housing on rural exception sites to meet an identified local

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
		need. Bus service subsidies are controlled by the County Council; developer
EDCLP/233 Billy Richards	 CBC should consider supporting Community-Led Housing schemes, The Sileby Project is aiming to establish as a Community Benefit Society to hold community assets 	contributions can in some instances be used to fund services. Community-led housing projects allow people and communities to play a leading role in addressing their own housing needs and could be supported by the council.
EDCLP/195 Greg Hutton Davidsons Developments Ltd	 Needs a flexible approach to affordable housing provision, taking account of other potential requirements associated with development such as education facilities 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/204 Guy Longley Pegasu s obo Davidsons Development Ltd (Rothley)	 Needs a flexible approach to affordable housing provision, taking account of other potential requirements associated with development such as education facilities 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	 Support requirement for affordable housing and the flexibility to consider viability and ensure development remains deliverable 	The support is welcomed, the policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/177 Sue Green House Builders	 Council's evidence identifies that it is not viable for sheltered or extra care housing to provide affordable housing 	The policy excludes sheltered or extra care housing from making a contribution.
Federation	 Affordable housing and other infrastructure requirements should not undermine deliverability Further clarification required on 2019 NPPF (para 64) 	A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known.
	affordable housing definitions and tenure mix	The definition of affordable housing and that provided in the supporting text has been derived from the NPPF but will be reassessed.
EDCLP/252 Leicestershire County Council	 Older person and specialist accommodation should be located with access to services and transport 	Housing provision is directed towards settlements in the Borough which have at least some services and facilities to meet the day to day needs of residents
EDCLP/252 Leicestershire County Council [Strategic Property]	 Support delivery of affordable housing, small site exemption may constrain the delivery Viability considerations are sound 	The support is welcomed, the policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
EDCLP/271 Lichfields on behalf of St	 Support delivery of 30% affordable housing and the recommendations of the Affordable Housing Viability Assessment 	The support is welcomed, the Charnwood Affordable Housing Viability Assessment forms a robust evidence base to support the 30% requirement.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Philips		
EDCLP/274 Avisons obo Jelsons	Affordable housing provision should take account of local need and should not make development unviable	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
		The policy does not prevent flexibility and Draft Policy LP6 on housing mix allows a mix of house types, tenures and sizes having regard to housing needs, market conditions, economic viability and site specific circumstances.
EDCLP/277 RPS obo Bellway Homes	 30% affordable housing on all sites needs to be fully explained through an independent viability assessment Additional information on affordable provision against other infrastructure requirements required to understand deliverability of the Local Plan 	A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known.
EDCLP/278 Savills obo Mr and Mrs Grainger	 Affordable housing policies should be sufficiently flexible to ensure plans are deliverable Welcome opportunity to negotiate affordable housing but 	The policy offers flexibility by allowing for a different level of provision should this be justified by a viability assessment.
	 Policy appears to miss contribution starter homes can make Policy LP4 should reference the four main types of affordable housing set out in NPPF Glossary to make the policy and its implications for the different types more clear 	The definition of affordable housing and that provided in the supporting text has been derived from the NPPF but will be reassessed.
Q10 - LP5 - Rural		
	comments on this draft policy?	
	with the proposed policy please set out why and what alternative	e approach would you suggest?
	nave missed something?	
DCLP/123	The policy is supported.	Comment in support of policy noted.
Mr Dennis		
Marchant		
DCLP/311	In considering individual housing in rural exception sites we feel	These are import material considerations and will be considered and
Dr Satbir Jassal	that the following should be noted.1. Adequate provision must be made for amenities and services.2. Consideration must be given to the possibility of increased traffic and parking facilities.3. The historical nature and character of the existing settlements must be preserved.	assessed through the development management process on a site by site basis.
DCLP/352	New housing in villages needs to be really affordable and suited to	Rural exception sites are small sites used for affordable housing. The
Mr John Barton	the needs of the people that live and work there. So far it is failing miserably. Too expensive. Too many big houses. Not enough small ones. Not enough council houses	purpose of a rural exception site is to address the needs of the local community by accommodating households who either current residents or have an existing family or employment connection.
		We are also undertaking a Housing Needs Assessment which will provide us with more evidence on local housing needs.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
DCLP/395 Dr Martin Field	A supplement to the proposed policy would be to state that schemes proposed as a 'community-led' initiative and endorsed by the local Parish Council should be supported.	Schemes proposed as 'community-led' could be successfully secured through the Neighbourhood Plan process.
DCLP/417 Mr Martin Smith	There should be very limited circumstance where exemptions are required. Very few people work in our rural villages and settlements. A sustainable policy should have people living close to employment, not adding to traffic on country roads. Focus affordable housing schemes in sustainable urban developments instead.	The supporting text notes that a partnership approach will be required. Comment noted. The availability of affordable housing in rural areas is often very limited and the purpose of a rural exception site policy is to meet a local identified need by only accommodating households who are either current residents or can demonstrate a local connection. The draft local plan includes an affordable housing policy (LP4) which will seek 30% affordable housing developments on sites of 10 or more houses.
LDCLP/02 Anonymous	Keep the new housing in keeping with the local area	Impact on appearance of the local area and appearance and design of developments are important material considerations and will be considered and assessed through the development management process.
LDCLP/51 Anonymous	There needs to be more. Utilise already built on ground better first.	The site selection process is underpinned by a range of evidence including an urban capacity study (which looked at brownfield sites) and a sustainability appraisal.
EDCLP/74 Mr Hussain	As long as the survey demonstrates a social housing need then it becomes ethical to disturb the environment and all that that implies. I don't agree with a policy that forces people to live away from a place where they would prefer to live. If it is the case that a survey demonstrates that people actually want to live in rural areas, then fair consideration should be given to fulfil that type of social housing perpetuity for relevant families. Do you think we have missed something?	Comments noted. The purpose of the draft policy is to support the provision of affordable housing for local people. Any planning application for a rural exception site will be considered against other policies in the adopted development plan document including environment policies.
	Yes, people's considerations, environment considerations above any bureaucratic ones.	
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	CPRE recognises the importance of sustainable communities and campaigns for policies which ensure the provision of affordable homes, especially rural affordable homes. We agree with this policy but would like to see the council go beyond simply supporting this endeavour and act proactively.	Comments noted.
EDCLP/147 Hoton Parish Council	Please define 'local'.	In the context of Question 10 and rural exception sites - the supporting text to LP 5 notes that the policy will seek to address identified local need by 'only accommodating households who are either current residents or can demonstrate a local connection for example through family or employment'.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
		It should also be noted that all people who require housing across the Borough are assessed in accordance with the Borough Council's Housing Allocation Policy.
EDCLP/165 Dr S.J.Bullman	This policy seems to contradict the aspirations of Section 4 – see my comments in Q4	Section 4 sets out the overall development strategy for the Borough which has a focus on urban concentration and intensification with some dispersed growth to other areas in the Borough. The site selection process has been informed by a wide range of evidence including landscape, ecology, transport and sustainability appraisal. The purpose of Policy LP5 is to address an identified local housing need for affordable housing in rural areas.
EDCLP/226	No Comment	
Eleanor Hood		
EDCLP/192 Severn Trent Water	Severn Trent understands the need to permit some rural housing as covered by Policy LP5 and that this type of development should be restricted to protect the countryside. Rural sites can also be difficult to provide utility infrastructure for, as they may not be located near to an existing supply and in some cases sewerage provision may be more cost effectively provided on at individual household level. If there is no existing sewerage network in a rural area or this distance to the nearest sewer is extensive this can lead to higher costs for developers.	Concerns over access to utility infrastructure noted. Each application will be assessed on a site by site basis and the availability of utility infrastructure will be considered as a material consideration through the development management process.
EDCLP/239 Jonathon Barratt- Peacock	Agree that housing should; be provided in rural villages. Too many young people growing up in these villages are unable to afford to live there when they leave their parents and have to move away. This affects the viability of the village and separates families.	Comments in support of LP5 noted.
EDCLP/239 Vivienne Barratt- Peacock	I support the Rural exception sites. I grew up in Rearsby and would have loved to buy a property there so that I could continue living near to my parents and in the community I grew up in. Sadly I could not afford any of the homes in such and affluent village so had to move to Leicester to buy my first home. Many children growing up in the smaller villages, hamlets and other settlements cannot afford to buy or rent there when they leave their parents' homes. Development of smaller affordable homes should be freely permitted in these types of settlements to allow adult children leaving home to remain in the communities they ahve grown up in.	Comments in support of LP5 noted. Rural exception sites are not classed as permitted development and will be considered alongside other planning material considerations through the development management process.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/252 Leicestershire County Council	Question 10 - Support Draft Policy LP 5 as it backs up work of the Rural Housing Enabler through the Leicestershire Rural Partnership.	Comments in support of LP5 noted.
EDCLP/252 Leicestershire County Council [Strategic Property	Policy LP5 is seen as maintaining the vitality of smaller settlements and therefore welcomed	Comments in support of LP5 noted.
Q11 - LP6 - Housin		
	comments on this draft policy?	
If you don't agree	with the proposed policy please set out why and what alternative nave missed something?	e approach would you suggest?
EDCLP/254	Housing mix should not undermine deliverability	The policy offers flexibility by allowing for a different housing mix should
lan Deverell Turley on behalf	 Housing mix should not undermine deriverability Housing mix should be dealt with in a supplementary planning document to allow regular updates and there 	this be justified by local need and site specifics.
of Rainier Developments Ltd)	should be no blanket policy, specific needs should be reflected	To be overly prescriptive in terms of mix would prevent a more focussed delivery of housing to meet local need and specific circumstances and to accommodate changes in requirements and products over time. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements.
EDCLP/255 Ian Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	 Housing mix should not undermine deliverability Housing mix should be dealt with in a supplementary planning document to allow regular updates and there should be no blanket policy, specific needs should be reflected 	 The policy offers flexibility by allowing for a different housing mix should this be justified by local need and site specifics. To be overly prescriptive in terms of mix would prevent a more focussed delivery of housing to meet local need and specific circumstances and to accommodate changes in requirements and products over time. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements.
DCLP/4 Mr Gerald Bowman	 Housebuilding in Thurmaston is not meeting housing need but is squeezing small first time buyer, low cost housing onto sites to maximise profits Low volume of 3/4/5 bed properties to allow people to remain in village Neighbourhood may suffer from falling expectations with insufficient housing for aspirational residents 	The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet local needs which would include providing larger family homes if necessary.
DCLP/29 Ms Suzanne Collington	 Underestimates the % housing required by those with disabilities. Aging population is increasing, so are those living with long term medical issues and mobility problems Figures need updating 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people.
DCLP/122 and	Policy is supported	Support for the housing mix policy is welcomed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
DCLP/124 Mr Dennis Marchant		
DCLP/145 County Councillor Max Hunt	 Access to housing important for communities to stay together, particularly in rural areas Social housing sold off to buy-to-let landlords Cost and type of tenures often inappropriate Leasehold and covenants should be addressed Greater attention to tenures and local homes for rent and first time buyers is needed 	The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet local need including tenure and cost.
DCLP/229 Mr Gideon Cumming	 Amend wording from 'seek' to 'require' 	The policy provides sufficient flexibility to ensure that development is not undeliverable and can respond to requirements. Site specifics, for example, may require a different mix of house types to that which would meet local needs exactly.
DCLP/353 Mr John Barton	 More 1-bed homes needed, too much bedroom tax being levied 	The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet local needs which would include providing 1-bed homes if necessary.
DCLP/396 Dr Martin Field	 Percentage of accessible and adaptable properties should be much higher than 5% Target for all new properties should be adopted. 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people.
DCLP/419 Mr Martin Smith	 Greater number of properties should be focused on elderly living 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people.
LDCLP/02 Anonymous	 Need 10% or more accessible properties with increase in elderly population Lack of understanding of OAP needs More single person housing, apartments/studios needed 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people.
LDCLP/15 Anonymous	 Need to consider ensuring more bungalows are built with the increase in over 65s 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people. The supporting text recognises that bungalows can provide more appropriate accommodation for those with limited mobility.
LDCLP/22 Anonymous	 More emphasis on bungalows to ensure mixed communities rather than only focusing on the needs of the young 	The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet local need, including housing for older and disabled people.
LDCLP/51 Anonymous	 Less executive type houses that are unsustainable, more sustainable/affordable simpler housing 	The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet local need including tenure and cost.
EDCLP/04 Gemma Olweny	 Shortage of affordable housing in Sileby, many large 3 – 5 bed properties need more, small 1 – 2 bed starter homes which people can afford 	The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet the needs of the whole community.
EDCLP/34 Cllr Mary Draycott	 New housing proposed is large with many 4,5+ bedrooms. 	The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet the needs of the whole community.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/71 William Davis Ltd	 Young people need 1, 2 and 3 bed to get on property ladder and bungalows for an ageing population, freeing up large properties and maintaining independence Justification is required to apply accessible and adaptable standards in accordance with NPPF para 127 Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need The evidence base provides nothing to support such a need and should be removed until evidence is put forward Higher standards should be substantiated by clear evidence 	Charnwood BC is currently undertaking a housing needs assessment to better inform housing mix requirements, including evidence on accessible and adaptable housing requirements. A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known.
EDCLP/74 Mr Hussain	 and tested as party of a viability assessment Not making sufficient change to address modern living Family should be allowed to grow in a property without overcrowding to encourage families remain together Oppose social housing uniformity and focus on new build social housing Design of affordable housing will create overcrowding for families, every child requires their own bedroom All bedrooms require sufficient storage, ensuites should be considered for larger rooms and no box rooms Home efficiency not just energy, need standards to avoid overcrowding and unhealthy lifestyles Every family is unique, the plan for social housing fails to respect this fact, should consider bespoke approach 	 The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet the needs of the whole community, including families. Social housing is provided through developer contributions on-site which means this will generally be new build. Size and design of affordable housing is intended to meet the broadest range of potential residents. It is often dictated by the Registered Providers who manage the housing and availability of Government grant funding.
EDCLP/108 Sue Barry	 Lots of expensive houses being built not many affordable Need to build Council houses and renovate older houses for people on lower/middle incomes 	The Local Plan seeks to provide a range of houses to cater for a diverse housing market and meet the needs of the whole community. Charnwood Borough Council will always seek to maximise affordable housing provision; however, we are obliged by Government to consider viability when planning for affordable housing and to ensure that development is not undeliverable due to excessive policy burdens. Council housing could be provided if that is determined to be the best means of meeting affordable housing need.
EDCLP/121 Marie Birkinshaw EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 Important to include green spaces, allotments, and green corridors to promote health benefits to future occupants Increase in people with mobility and health problems not reflected in 5% of new properties meeting accessible & adaptable categories 2&3, suggest target should be 10% Should maintain database of homes built to address needs of older people/wheelchair users to target appropriate provision across developments 	 The Local Plan contains policies which seek to promote open spaces for multiple benefits, including health and well-being. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people. A database of adaptable properties could be included as part of the Local Plan monitoring framework.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 Restrict purchase of bungalows under 'right to buy' to resist conversion to 2 storey homes to preserve existing 	Restricting purchase of right to buy properties is governed by national legislation and could not be introduced through the Local Plan.
EDCLP/147 Hoton Parish Council	 Rented % needs to be written into the policy 	Flexibility in the policy is provided to allow the mix of types and tenures to respond on a site by site basis to housing needs, market conditions, economic conditions and circumstances; inclusion of an exact % would be overly prescriptive.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	 Support balanced mix of market and affordable dwellings and inclusion of wheelchair accessible homes, bungalows and specialist provision 	The support is welcomed.
EDCLP/163 Liz Hawkes Anstey Parish Council	 No specific targets for house sizes as previously proposed in SPD Design standards for affordable housing not realistic for growing families 	Flexibility in the policy is provided to allow the mix of types and tenures to respond on a site by site basis to housing needs, market conditions, economic conditions and circumstances; inclusion of an exact target would be overly prescriptive.
		Size and design of affordable housing is intended to meet the broadest range of potential residents. It is often dictated by the Registered Providers who manage the housing and availability of Government grant funding.
EDCLP/176 Hannah Post Barton Willmore obo Michelmersh Brick Holdings Plc	 Trigger for applying 5% requirement for Building Regulations Part M4(2) unclear; should be clarified and at appropriate size of scheme which having consideration to site specific constraints, viability and appropriate housing mix 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people which should provide further evidence for introducing an appropriate trigger.
EDCLP/178 Mark Rose Define obo Bloor Homes	 Welcome flexibility of mix of housing in schemes to take account of specific circumstances and difference between need and demand Clear evidence on need for accessible and adaptable housing standards required which should consider whether can be met in some way through the M4(1) standards Standards would add substantial costs to schemes and 	The support for the flexibility in the policy is welcomed. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people which should provide further evidence for introducing an appropriate trigger. A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known.
	 should be considered through wider viability assessment of plan's policy requirements Support principle of sheltered and extra care provision; however, blanket requirement does not account for site and location-specific constraints; Council should meet this need by allocating specific sites in appropriate locations 	The policy provides general support for specialist older persons accommodation, in accordance with identified need, but does not seek to provide a blanket requirement.
EDCLP/179 Mark Rose	 Welcome flexibility of mix of housing in schemes to take account of specific circumstances and difference between 	The support for the flexibility in the policy is welcomed. Charnwood BC is undertaking a housing needs assessment to better inform housing mix

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Define obo Bloor Homes (HS37)	 need and demand Clear evidence on need for accessible and adaptable housing standards required which should consider whether can be met in some way through the M4(1) standards Standards would add substantial costs to schemes and should be considered through wider viability assessment of plan's policy requirements Support principle of sheltered and extra care provision; however, blanket requirement does not account for site and location-specific constraints; Council should meet this need by allocating specific sites in appropriate locations 	requirements, including housing for older and disabled people which should provide further evidence for introducing an appropriate trigger. A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known. The policy provides general support for specialist older persons accommodation, in accordance with identified need, but does not seek to provide a blanket requirement.
EDCLP/180 Alex Prowse Astill Planning Consultants obo Mr Fothergill	 Not clear whether 5% accessible and adaptable requirement relates to category 2 accessible and adaptable dwellings or category 3 Wheelchair Use Dwellings, PPG limits this policy application Consider viability of required standards for market housing and self-build housing; different sized sites and different areas to ensure deliverability not undermined Standards not appropriate for self-build housing 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people which should provide further evidence for introducing an appropriate trigger.A study assessing whole plan viability will be undertaken before presubmission consultation when all obligations of the plan are known.Consideration will be given to the potential for exemption of self-build homes.
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	 Supportive of flexible approach to housing mix to meet Borough's needs at specific point time on site-specific basis; also assists deliverability allowing an appropriate response to changing market conditions 	The support for the flexibility in the policy is welcomed. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements.
EDCLP/205 Guy Longley Pegasus obo Davidsons Development Ltd (Anstey)	 Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.
EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold)	 Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.
EDCLP/207 Guy Longley	Policy should be based on clear evidence of need and allow for site circumstances or viability	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Pegasus obo Davidsons Development Ltd (Sileby)	 Where a mix is requested, this should be framed as a series of ranges 	flexibility.
EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Field Head)	 Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.
EDCLP/209 Amy Smith Pegasus obo Jelsons	 Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	 Support flexible approach responsive to local housing needs, market conditions and changing circumstances Clear evidence of accessible and adaptable housing need required to justify proposed requirement of 5% 	The support is welcomed. Charnwood BC is currently undertaking a housing needs assessment to better inform housing mix, including evidence on accessible and adaptable housing requirements.
EDCLP/226 Eleanor Hood	 Policy is too weak, should not just 'seek' but 'ensure' a proportion of single storey dwellings to suit changing demography 	We are obliged by Government to consider viability when planning for housing mix and to ensure that development is not undeliverable due to excessive policy burdens. Site specific circumstances may mean that we cannot always require a certain type of housing.
EDCLP/246 Andrew Collis Gladman Developments Ltd	 Welcome flexible approach to housing mix and recognition of specific circumstances to ensure policy is not a barrier to development Do not object to 5% requirement in principle but needs evidence and viability testing Trigger needed for 5% requirement and should not be applied a s proportion of all dwellings delivered in the Borough 	The support is welcomed. Charnwood BC is currently undertaking a housing needs assessment to better inform housing mix, including evidence on accessible and adaptable housing requirements.A study assessing whole plan viability will be undertaken before presubmission consultation when all obligations of the plan are known.
EDCLP/241 L.Tomalin	 Small starter homes should not be extended to 5 bed homes and have no parking space 	Draft Policy LP35 on car parking standards has been included in the Local Plan which reflects the requirements of Leicestershire County Council as the local Highway Authority.
EDCLP/182 Pegasus obo David Wilson Homes	 Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.
EDCLP/161 Councillors Gill Bolton and Alice	 Need to further consider properties for elderly and/or disabled together with additional council owned housing All new homes should incorporate solar panels and 'green' 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Brennan Shelthorpe Ward	building materials to make contribute to managing climate change	Council housing could be provided if that is determined to be the best means of meeting affordable housing need. Draft Policy LP30 on sustainable construction has been included to contribute to climate change management
ELDCP/160 Persimmon Homes	 To adopt higher optional standards (MS4(2)) should be in accordance with NPPF by providing clear evidence of need and where impact on viability has been considered. Draft Policy LP6 should incorporate wording for site exceptions (such as those subject to flooding, adverse gradients etc.). 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people which should provide further evidence of need and viability. A study assessing whole plan viability will be undertaken before pre-submission consultation when all obligations of the plan are known. Consideration will be given to additional policy wording to take account of site exceptions.
EDCLP/153 East Goscote Parish Council	 In coming decades, most new households will be small ones; only 24.43% will be households with dependent children, the rest will be single-person households (31.87%), couples (23.04%), couples with one or more other adult (6.48%) or "other" households (16.2%). There will be an increase in older people with over-75 households are set to increase by 10,353. Dwellings for smaller households and older people should be built at a slightly higher density than for larger households Older people may have issues with mobility and access which are exacerbated by living outside walking distance from facilities and services Commitment to ensure new dwellings have an appropriate mix of sizes, types and tenures, is not borne out by housing permitted so far. The West of Loughborough urban extension is a rather low density of 32 dph, and, though the final mix of dwellings is not known, the Design and Access Statement does not indicate a great variety stating "The majority of houses will be at 2 storeys with some at 2.5 storeys." "This will range from the larger detached 4-5 bed houses with deeper front and rear gardens, to the linked smaller starter homes with shallow frontages." It also includes only one "community hub", rather than local facilities within walking distance of all new dwellings. 	Draft Policy LP6 seeks to ensure that the housing needs of our community are met, including dwellings for smaller households and older people. There is a range of densities across the West of Loughborough SUE which reflects the various locations within the development, an average 32 dph reflects the edge of countryside location. Evidence in 2014 showed the focus of new market housing provision should be on two-and three-bedroom houses rather than large executive homes. The proposal is considered capable of meeting the objectively assessed need in terms of market housing and the size of units.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/253 Ann Irving	 detached single-family houses. The requirement for homes to suit smaller households, particularly ageing households who may have mobility problems, may not be met under existing policies. There should be a commitment to redress the balance in allocations other than the urban extensions. Plan does not prevent extensions to small homes, or demolition of the modest in favour of the palatial. Could the plan overcome these trends? They affect not only younger people but also older people trying to downsize; this destroys the aim of housing mix. New housing estates suffer the same practice with modest sized homes expanded soon after occupation. 5% adaptable to wheelchairs etc is far too modest. Homes built for life should have appropriate design polices. This is not an expensive standard to adopt, wider doorways and smaller step are not difficult to incorporate and make a significant contribution, even without bath and bed adaptations. 	Permitted development rights often allow for extensions without the requirement for planning permission. It is difficult to resist a private individuals desire to extend their property and robust evidence as to the detrimental impact would be necessary. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people which should provide further evidence for introducing an appropriate trigger.
EDCLP/239 Jonathon Barratt- Peacock	 More bungalows or properties with lift access in urban areas are essential to meet the needs of the aging population 	Draft Policy LP6 seeks to ensure that the housing needs of our community are met, including dwellings for smaller households and older people.
EDCLP/239 Vivienne Barratt- Peacock	 More bungalows or properties with lift access in urban areas are essential to meet the needs of the aging population 	Draft Policy LP6 seeks to ensure that the housing needs of our community are met, including dwellings for smaller households and older people.
EDCLP/211 Cllr Margaret Smidowicz	 Growing population has range of housing needs including specialist older people's homes; however, we only appear to be catering for transient students with bungalows now containing students Are the 1,300 additional homes required for families 	Draft Policy LP6 seeks to ensure that the housing needs of our community are met, including dwellings for smaller households and older people. Policy LP9 seeks to manage the proportion of houses in multiple occupation in our community. The additional 1,300 homes proposed to ensure flexibility over the plan period will represent a variety of house types, tenures and sizes to meet our community's need.
EDCLP/195 Greg Hutton Davidsons Developments Ltd	 Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.
EDCLP/204 Guy Longley Pegasu s obo Davidsons Development Ltd	 Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
(Rothley) DCLP/261 Edward Argar MP EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey	 Agree on the need for housing for older people and the disabled and the need for bungalows Supports flexible approach to housing mix which enables development to be responsive to need at a specific point in time on a site by site basis Also assists in ensuring deliverability 	Draft Policy LP6 seeks to ensure that the housing needs of our community are met, including dwellings for smaller households and older people. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people which should provide further evidence for introducing an appropriate trigger. The support for the flexibility in the policy is welcomed. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements.
Homes EDCLP/177 Sue Green House Builders Federation	 Draft Policy LP6 seeks at least 5% of all new dwellings to be Building Regs Part M Category 2 or 3 to meet the needs of the ageing population. This is too ambiguous and contrary to the NPPF; to be effective further clarification should be provided, justified by supporting evidence To adopt M4(2)&(3), policies should be underpinned by relevant, up to date evidence, in accordance with the NPPF (para 127f & footnote 46) which should be adequate, proportionate and focussed on supporting and justifying policies. Optional standards should only be introduced on a "need to have" rather than a "nice to have" basis. Need is generally defined as "requiring something because it is essential or very important rather than just desirable" Council should focus on ageing population living in the Borough, compared to national / regional figures and proportion of households living in new homes. Many older people already live in the Borough and are unlikely to move home. There may be a need for some dwellings to be built to optional technical standards, especially specialist housing, but not all existing older residents will move home or choose to live in a new dwelling. Under-occupancy of new family homes by older people/individuals is at odds with making the best use of the housing stock NPPG sets out that evidence should include identification of: likely future need; size, location, type and quality of dwellings needed; accessibility & adaptability of the existing stock; variations in needs in different housing tenure; and 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people, which should provide further robust evidence for introducing Part M4(2)&(3) and an appropriate trigger. A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known. The policy does intend to allow for site exceptions such as flooding or gradients to be considered and is worded accordingly.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/194 Guy Longley Pegasus on behalf of Hallam Land Management	 viability Policy requirement for provision of M4(2)&(3) dwellings should be viability assessed. There are substantial cost differences between M4(2)&(3) compliant homes. Sept 2014 cost estimates were £1,646 per apartment; £2,447 per house for M4(2) and £15,691 per apartment; £26,816 per house for M4(3). Viability testing should include such costs plus any inflation increase since 2014 NPPG requirement is for M4(3) should only be for dwellings over which Council has housing nomination rights over Draft Policy LP6 has no reference to site exceptions due to site-specific constraints such as flooding, gradients Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.
EDCLP/271 Lichfields on behalf of St Philips	• Support Draft Policy LP6 and consider it represents a practical approach to housing mix informed by up to date evidence taking account of site specifics and local circumstances rather than an imposed percentage split	The support for the flexibility in the policy is welcomed. Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements.
EDCLP/274 Avisons obo Jelsons	 Policies should not seek a specific mix; this should be left to market forces. Developers are experienced in sales and policies that impose unsaleable house types may render developments unviable 	Flexibility in the policy is provided to allow the mix of types and tenures to respond on a site by site basis to housing needs, market conditions, economic viability and circumstances. However, the policy also seeks to ensure the housing needs of the community are met, based upon a robust evidence base.
EDCLP/276 Pegasus obo Wilson Enterprises	 Policy should be based on clear evidence of need and allow for site circumstances or viability Where a mix is requested, this should be framed as a series of ranges 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements and the policy currently provides flexibility.
EDCLP/277 RPS obo Bellway Homes	 Reference to bungalows addressing needs of older people would be overly prescriptive, detailed and unrealistic on all sites. They may be appropriate on certain sites and housing mix should be addressed on a site by site basis. Developers are best placed to ensure the most effective mix site by site, having regard to location, the market it serves and the need to maximise viability of market homes. Policy proposes at least 5% of new properties to be Building 	Charnwood BC is undertaking a housing needs assessment to better inform housing mix requirements, including housing for older and disabled people, which should provide further robust evidence for introducing Part M4(2)&(3) and an appropriate trigger.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	Regs Part M4 Category 2 or 3 properties. This is not mandatory and strong evidence is needed to justify this. The standard should only be applied to affordable homes, and contrary to national policy, and should be amended.	
	Standards of Residential Properties	
	comments on this draft policy? with the proposed policy please set out why and what alternative	e approach would you suggest?
Do you think we h	ave missed something?	
DCLP/30 Ms Suzanne Collington	 Agree with overcrowding being a detrimental issue. 	The support is welcomed.
DCLP/121 Mr Dennis Marchant	The policy is supported.	The support is welcomed.
DCLP/146 County Councillor Max Hunt	 Requires resources to be applied to enforce standards where landlords sub-divide rooms to accommodate more tenants. Additional Registration under the Housing Act would assist agencies to enforce higher standards 	Sub-division of rooms may require planning permission and would be an enforcement issue. Additional Registration is to be considered by Cabinet shortly.
DCLP/284 Harborough District Council	 Not clear if this policy is justified in line with NPPF "policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified" (footnote 46)). 	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood.
DCLP/354 Mr John Barton	 Ironic that obesity is increasing while the sizes of homes has been shrinking. Need to increase active transport . Houses specifically need more storage space. 	The Draft Local Plan seeks to support the health and well-being of communities and promote healthy and active lifestyles. The nationally described space standards recognise the need for storage space.
DCLP/397 Dr Martin Field	 Space Standards need to be quoted in detail so that they can be challenged if required. Responses may be predominantly from housing suppliers who argue for smaller and smaller properties to maximise capital returns. Requirements that denote development site densities will challenge claims that the build out of some sites require small residential units and enable the planning authority to 	The national space standards are produced by central Government and may be subject to change, detailing them may mean the Local Plan becomes outdated. The amount of responses received does not give a certain point more weight. Density requirements which are overly restrictive lack flexibility and do
	challenge new properties that are too small and too dense on some sites, and too sparse and large on others.	not allow for site specifics to be considered.
LDCLP/22 Anonymous	 There should be adequate space between properties as well as in them. 	Draft Policy LP2 on design seeks to ensure adequate space between buildings.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/71 William Davis Ltd	 Requirement for delivering the Nationally Described Space Standards (NDSS) for dwellings must be supported by evidence of need as described by para 127 (f) and footnote 46 of the extant NPPF. No such 'need' case has presently been advanced to justify Policy LP7. Policy LP7 must be viability tested; in providing no viability evidence the Council are not in accordance with national policy, which will render the plan unsound. In addition, the PPG states "It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies Policy LP7 should be omitted until such the requirement can be substantiated with supporting viability evidence. Space standard is totally flawed, Charnwood's decent home standard begs the question; would the standard suffice for those who allocate it? The disgraceful standard set by the Borough places families who are already facing financial hardship into sizeable debt before they can actually begin to live in an inadequate home. Families want to live life to the fullest and not just to exist, accommodating misery created by the absence of fairer opportunities. A family's dignity & honour should be taken into consideration by a responsible authority. The purpose of human life is to live happily and prosper, the function of government is to provide the conditions to allow that to happen. The draft local plan fails to provide the relevant conditions in a timely and efficient manner for families already living in overcrowded & squalid conditions and are on a housing 	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood. A study assessing whole plan viability will be undertaken before presubmission consultation when all obligations of the plan are known. The optional national space standards are additional requirements set by Government in relation to internal space within new dwellings. To increase the space standards would be beyond the remit of the Local Plan and require changes at a national level.
EDCLP/121 Marie Birkinshaw	 waiting list. Avoid 'rabbit-warren' type developments with lots of drive space and higgledy-piggledy properties, with lots of driveways. Try to encourage use of public transport rather than excessive car ownership, especially as we need to move to net-zero carbon. 	The national standards relate to internal space in new dwellings. Draft Policy LP2 on design seeks to ensure attractive, well laid out developments. The Draft Local Plan seeks to support sustainable transport options.
EDCLP/143 CPRE Leicestershire	 DCLG 'nationally described space standard' is not mandatory. How will these standards be implemented and monitored? 	They would be a requirement for granting of planning permission, if adopted.

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and its Charnwood District Group		
EDCLP/165 Dr S.J.Bullman	• This criterion should be rigorously enforced and should be a strong feature of the Officer report in the assessment of an application. Any Plans Committee should be made aware of how near the minimum any application is.	They would be a requirement for granting of planning permission, if adopted, but each application will be judged on its own merits.
EDCLP/176 Hannah Post Barton Willmore obo Michelmersh Brick Holdings Plc	 No objection to the adoption of these standards in principle however they should be applied flexibly and consider site specific constraints and features, location and viability. A whole plan viability assessment is supported and should occur prior to the next consultation stage to ensure adoption of these standards would not comprise development coming forward. 	The space standards would provide a minimum standard we would expect to be met. However, consideration will be given to applying flexibility.A study assessing whole plan viability will be undertaken before presubmission consultation when all obligations of the plan are known.
EDCLP/178 Mark Rose Define obo Bloor Homes	 Written Ministerial Statement, 25th March 2015, confirms that the optional new national technical standards should only be required if they address a clearly evidenced need, and their impact on viability has been considered, in accordance with the NPPG. Footnote 46 of NPPF paragraph 127f, requires the provision of evidence to demonstrate that the imposition of the standard can be justified. If the Borough Council intends to adopt the space standard then clear, up to date evidence of a specific local need is required. The potential implications on development viability, (cumulatively with other Local Plan requirements) housing affordability (due to additional costs extra floorspace being passed onto homebuyers) and potential impact on development delivery rates in the area, would need to be carefully examined in accordance with the PPG 	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood. A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known.
EDCLP/179 Mark Rose Define obo Bloor Homes (HS37)	 Written Ministerial Statement, 25th March 2015, confirms that the optional new national technical standards should only be required if they address a clearly evidenced need, and their impact on viability has been considered, in accordance with the NPPG. Footnote 46 of NPPF paragraph 127f, requires the provision of evidence to demonstrate that the imposition of the standard can be justified. If the Borough Council intends to adopt the space standard then clear, up to date evidence of a specific local need is required. The potential implications on development viability, 	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood.A study assessing whole plan viability will be undertaken before presubmission consultation when all obligations of the plan are known.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	(cumulatively with other Local Plan requirements) housing affordability (due to additional costs extra floorspace being passed onto homebuyers) and potential impact on development delivery rates in the area, would need to be carefully examined in accordance with the PPG	
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	 Requirements for new dwellings to meet nationally described space standards must be fully justified, in accordance with footnote 46 of the NPPF. Unless such evidence exists for a specific need for these standards to be applied, issues such as this should instead be left to Building Regulations. 	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood.
EDCLP/226 Eleanor Hood	 Policy is too weak. It should state we 'require' rather than 'expect' new accommodation to meet space standards. 	We are obliged by Government to consider viability when planning for housing and to ensure that development is not undeliverable due to excessive policy burdens. Site specific circumstances may mean that we cannot always require space standards.
EDCLP/192 Severn Trent Water	 Note that any changes to plot sizes may impact on the amount of impermeable area and this will need to be considered when designing the site drainage system. 	The Draft Local Plan seeks to ensure development is designed with appropriate sustainable drainage systems through Draft Policy LP32.
ELDCP/160 Persimmon Homes	 Adoption of national optional space standards should be in accordance with the 2019 NPPF (para 1 27f & Footnote 46), through a local assessment to justify the need Transitional arrangements should be provided for outline consents granted prior to adoption that should not (nor their associated subsequent reserved matters' applications) 	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood. The introduction of transitional arrangements will be considered.
EDCLP/193 Richard Webb	 Short and contains no ambition to improve on a national standard. Propose an examination is undertaken to see if the national standard is recommended by the residents of Charnwood rather than relying on a set of recommendations from another region. An opportunity to improve upon a national standard or to provide evidence that this is fit for purpose for Charnwood 	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood. However, the standards are national minimum standards and development could not be required to exceed them without changes in national policy.
EDCLP/177 Sue Green House Builders Federation	 To adopt the optional space standards should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) where the need for an internal space standard can be justified, underpinned by relevant, up to date 	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood.
	 Authorities should take account of need, viability and timing and provide a local assessment evidencing the case for Charnwood. 	A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known.
	 Space standards should only be introduced on a "need to have" rather than a "nice to have" basis. Need is "requiring something because it is essential or very important rather 	The effects of introducing this standard will be fully considered

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	 than just desirable" and should identify the harm caused or may be caused in the future. HBF is not aware of evidence that market dwellings not meeting national space standards have not sold or those living in these dwellings consider that their housing needs are not met. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. Full impact of space standards on viability including build costs, selling prices, relevant price points and affordability should be assessed. The greatest impact is often on smaller (2 bed /4 person and 3 bed/5 person) dwellings. Council cannot expect home buyers to absorb extra costs, an unintended consequence may be to push additional families into affordable housing need because they can no longer afford to buy a compliant home. There is also an impact of larger dwellings on land supply reducing site yields so a greater amount of land would be needed to achieve the same number of units. Efficient use of land is less because development densities decrease. Fewer units per site intensifies any viability challenges undermining affordable housing trajectory. Delivery rates are predicated on market affordability at relevant price points and maximising absorption rates. Impact on affordability may result in reduced or slower delivery rates. Transitional arrangements should be allowed to move sites through the planning system before policy requirements are enforced. Space standards should not be applied to any outline or detailed approval prior to the specified date and any reserved matters applications should not be subject. 	
Mr Gideon Cumming	I agree.	The support is welcomed.
EDCLP/274 Avisons obo Jelsons	• This should be a matter of national policy to ensure a level playing field for all developers. Setting space standards at a local level can create perverse incentives for housebuilders to develop in certain area and not in others. For this reason, this policy should be deleted.	Charnwood BC is undertaking a housing needs assessment which will consider whether national space standards are appropriate in Charnwood. Charnwood Borough Council wishes to ensure that the housing needs of our community are met. If evidenced, the space standards would ensure a minimum standard of amenity to ensure adequate living conditions and avoid overcrowding.
EDCLP/277	 Nationally described space standards are becoming a 	Charnwood BC is undertaking a housing needs assessment which will

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RPS obo Bellway Homes	commonly applied policy nationally for both affordable and market homes which most developers including Bellway are willing to incorporate within their house type portfolios, if the	consider whether national space standards are appropriate in Charnwood.
	draft policy is fully justified and understood against viability implications.	A study assessing whole plan viability will be undertaken before pre- submission consultation when all obligations of the plan are known.
Does our propose	uild and Custom Housebuilding ed policy provide sufficiently for the needs of people who wish to bu suggest and why?	undertake self-build or custom housebuilding? If not, what other
DCLP/114 and DCLP/120 Mr Dennis Marchant	The policy is supported.	Noted – support is welcomed.
DCLP/338 Sturdee Poultry	The Self and Custom Build Register is not published in the District Council's website (in conflict with the requirements of the Self and	The register is published on the Council's website. The link can be found here:
Farms Ltd (Mr John Wheeler)	Custom Build Act) and therefore cannot be assessed. However, it is highly likely that the majority of people on the Register will not wish to build their dream 'Grand Designs ' home on a large new housing estate. This means that the policy requiring a percentage of self build homes on large sites will not provide sufficiently for the needs of those on the Register. The plan should allocate small sites specifically for self and custom build housing and allow for the provision of small sites of up to 10 dwellings for self and custom build housing adjacent to the defined limits of settlements.	http://consult.charnwood.gov.uk/portal/planning/self_build/self_build_reg
DCLP/356 Mr John Barton	Yes. Some individuality is good. We don't want to all live in little boxes all the same. Make it easier for self-build.	Noted – support is welcomed.
DCLP/399 Dr Martin Field	It is important to recognise that the term 'self build' can cover a range of initiatives like resident-led building projects, community land trusts, cohousing initiatives and others. Building works can be self-provided or self-commissioned, individually and in or by groups. The provision of sites should not be tied to the build-out pace of larger sites but should be incorporated into a pace of development that meets the readiness of the self-builders.	 Noted – the Council is obligated to make provision for self build and custom build as part of the Self-build and Custom Housebuilding Act 2015. However, the Act itself notes that self-build and custom housebuilding are defined in the Housing and Planning Act as: "the building or completion by— (a) individuals, (b) associations of individuals, or (c) persons working with or for individuals or associations of individuals of houses to be occupied as homes by those individuals.
		But it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person."
LDCLP/02 Anonymous	Yes allow home owners to work their homes and develop	Noted – support is welcomed.
LDCLP/22 Anonymous	Yes	Noted – support is welcomed.

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LDCLP/34 Anonymous	There must be boundaries in terms of finish and image.	Noted – these aspects would be subject to separate criteria. For example, design principles may be set out in a separate Supplementary Planning Document. Design Codes and design specifications can also be set out in conditions accompanying any planning permission.
LDCLP/51 Anonymous EDCLP/51 Foxley Tagg Planning obo National Custom & Self Build Association	No, encourage infilling sustainably sympathetically to help stop green field building but increase housing supply. NaCSBA's mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process. <u>Custom & Self-Build</u> Current custom and self-build (CSB) policy in England has evolved over the last 5 years with the Self-build and Custom Housebuilding Bill, receiving Royal Assent on 26 March 2015. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the borough that wish to build their own home. NaCSBA are pleased to note that Charnwood BC do keep a self- build register which prospective self-builders can sign up to via the council's website. NaCSBA would recommend however that details are provided to <u>http://localselfbuildregister.co.uk</u> so that the register is easier to find. The <i>Right to Build</i> legislation clearly demonstrates how the government intends for LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination. The Housing and Planning Act 2016 conferred on LPAs the responsibility to: "Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority's area"	 Self-build can include infill plots, with the evidence suggesting that these make up a significant proportion of self-build project. The Council welcomes the constructive and helpful feedback on Draft Policy LP8. The Council considers that it has drawn together evidence of demand from the sources identified in the NPPF / PPG. The Council notes that there are several policies across the country that require a percentage of service plots to come forward as part of larger development sites. However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. As such, the Council would welcome the opportunity to engage with the NaCSBA to ascertain which policy approaches have been the most successful in realising self-build / custom build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.

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	The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act.	
	Paragraph 61 of the revised National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state:	
	"The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)."	
	Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders.	
	Recent appeal decisions such as a proposal for the erection of up to 5 self-build dwellings at The Meadows, Bromsberrow Heath, Ledbury (APP/P1615/W/18/3213122) have highlighted and confirmed the weight that should be afforded to self-build as a material consideration in determining planning applications, which in turn demonstrates the importance of CSB in housing delivery. As a consequence of the policy and guidance outlined above, it seems clear that LPAs have a duty conferred upon them to actively meet the needs of those wishing to build their own homes.	
	CSB in the Charnwood Local Plan	

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	Whilst NaCSBA are pleased to note that the Local Plan review does contain reference to self- build, it is concerned that the provisions set out in Policy LP8 do not discharge the LPA's duties towards meeting the needs of those that wish to build their own home.	
	Policy LP8 pays lip-service to paragraph 61 of the NPPF by stating that the LPA will support proposals for self-build and custom housebuilding in locations considered suitable for housing in accordance with Draft Policy LP1. However, proposals in line with LP1 would be considered appropriate regardless of whether they constituted self-build or not, and as such this aspect of Policy LP8 offers nothing over and above other housing policies contained within the plan. As such this policy is very unlikely to lead to any additional self-build opportunities being provided. This part of LP8 could be remove without any impact upon delivery of CSB plots and as such is impotent.	
	The second aspect of the policy required allocated sites of 20 units and above to offer 5% of homes on the site as self-build plots. Whilst it is acknowledged that this will lead to self-build opportunities over and above those provided by other housing policies within the emerging Plan, most self-builders do not wish to build their bespoke home on a large estate. As such, whilst this may deliver some numbers it is not meeting the real needs of those that wish to build their own home.	
	In order to meet the requirements, set out by national policy, it is important that the Local Plan is proactive and progressive in this area. It is not considered sufficient to include a policy that simply states that the LPA will 'support' delivery of building plots for custom and self-build, nor to offer CSB plots on large housing estates.	
	Instead, in order for the plan to be considered to be <i>positively prepared</i> and <i>Consistent with national policy</i> it must demonstrate specifically and in some detail how it will ensure that the needs of custom and self-builders are to be met.	
	Recommendations	

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	There are a number a different policy mechanisms that could be employed to ensure a steady and sufficient provision of CSB opportunities within the borough, which would mean that the plan could be considered to meet needs of those wishing to build their own home, including:	
	Rather than requiring 5% of units on large sites to be CSB, the LPA should seek to allocate small sites of between 5 and 20 units specifically for 100% CSB. Self-builders would rather build their own home on a small site with other bespoke self-build homes than on the corner of a large developer-led housing estate.	
	Policy LP8 should be amended to support the provision of single plot custom and self- build proposals adjacent to existing settlement boundaries, where the plot would constitute rounding off and where it will not result in an unacceptable protrusion into the open countryside. This would deliver CSB opportunities in sustainable locations, without adversely affecting the countryside where developer-led housing would not be appropriate and so actually increase the opportunities for those wishing to build their own home.	
	These two alterations would, in the view of NaCSBA, result in more suitable CSB opportunities being delivered over and above the existing approach. It is considered that in order for the plan to be considered <u>Positively prepared</u> and <u>Consistent with national policy</u> at examination, it will be necessary to include both of the above recommendations in order to demonstrate that SBC is serious about seeking to meet the needs of those wishing to build their own home.	
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	Most self-builders want single plots rather than plots on large housing developments. A major drawback to self build/custom build homes is securing mortgages from banks and building societies due to uncertain risks including overspend. In the UK we do not as yet have a culture of self-build on housing estates unlike say in Germany where it has been encouraged over many generations with an industry built around it. Potential lessons can be learned from Bicester where large scale self-build projects promoted by Cherwell District Council is	Noted – Draft Policy LP1 provides for single plots to come forward, subject to being in accordance with the policy criteria.

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	underway	
EDCLP/71 William Davis Ltd	The Draft Policy seeks a provision of <i>at least</i> 5% of homes to be made available as serviced plots or self-build and custom housebuilding as part of an appropriate mix on sites of 20 or more dwellings (our emphasis.) The Council have tested the viability of allocating self/custom plots on larger sites but have not demonstrated a need, particularly for plots of this nature on larger sites. It is the experience of WDL that people on the self/custom build register prefer plots within more rural settings and are not necessarily looking to erect dwellings within existing building sites. This would potentially leave undeveloped plots within sites which otherwise were guaranteed to have been built out by the developer. Therefore, there is a question mark over of the overall housing delivery, and soundness of the Plan with such a Policy relating to self/custom build. It is suggested	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and the additional evidence provided through the Housing Needs Assessment. Draft Policy LP1 and Draft Policy LP8 have been drafted to provide the flexibility to cater to demand for single plots and those who may wish to access serviced plots on larger developments. However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.
	that the register could be met through windfall sites and/or Neighbourhood Plan allocations. Moreover, before introducing a Policy requiring a portion of all large sites to accommodate self/custom builds the Council should consider the practicalities relating to health & safety, working hours, length of build programme as well as the overall design of a development. As these factors cannot be guaranteed by allocating areas of self/custom build within a large site. Beyond this, there is a direct impact upon sales for the larger site, as dwellings surrounding the allocated self/custom build sites are difficult to sell due to the uncertainty over the design of these individual plots.	
EDCLP/74 Mr Hussain	Yes	Noted – support is welcomed.
EDCLP/121 Marie Birkinshaw	Think so	Noted – support is welcomed.
EDCLP/134 RCA Regeneration Limited on behalf of Mr and Mrs Gamble	In relation to self-build and custom housebuilding, we object to the policy, as currently worded. Having multiple contractors, all controlled by different developers on one site is, in practice, a serious difficulty and would impose an unreasonable burden on particularly small and medium-sized housebuilders. Requiring a minimum percentage would depend largely on the nature of the site and how easy it would be to achieve with multiple developers. Self-builders are typically much slower at delivering new housing – has this been factored into the trajectory for the plan? Self-build process is also notoriously more expensive than that of a housebuilder ² . This is because of a number of factors, where housebuilders can achieve aconomics of	The concerns about the implementation of the policy are noted. However, there are examples of mechanisms to manage the interaction between housebuilder and self-builder. For example, Local Development Orders can be created, and/or carefully worded outline applications followed by reserved matters applications submitted by either the developer or the self-builder. However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots.
	number of factors, where housebuilders can achieve economies of	Further research and analysis will take place prior to the next draft of the

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	 scale and have 'purchasing power' as well as fixed costs being smaller as an overall proportion of the build. We would urge focussing on allocating sites specifically for self-build or include them within the strategic allocations, allowing small areas to be secured as separate from the main development. We also have significant concerns over the legal mechanism for the delivery of such a policy. Given that S106 Agreements would typically be in place for sites of 20 dwellings or more, any subdivision of such a site into self-build and the main developer would not address the issue of self-builders being 'wholly and severally liable' to pay all S106 monies in the event the developer goes bust. We consider this could seriously hamper self-builders being able to secure finance for their building work. Until legal advice proves that this could be a genuinely deliverable policy, we will continue to object to it. 2 https://www.homebuilding.co.uk/news/average-self-builder-spend-report/ 	local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We broadly agree but the 'rounding down' plot formula needs revisiting. We suggest that where the ratio is above 1.50 – 'round up'; below 1.50 'round down'.	The rounding down is to support viability, and to ensure that there are no unintended consequences linked to supply and demand.
EDCLP/147 Hoton Parish Council	Self-building should be encouraged.	Noted – support is welcomed.
EDCLP/165 Dr S.J.Bullman	5.44/Policy LP 8 seems to imply a potential to conflict with the need for Affordable Homes, as Self-build homes are very unlikely to fall into the normal "Affordable" category. Care needs to be taken that self-build does not just push out any affordable homes space	The various housing needs are assessed within the SHMA and the Housing Needs Assessment. This evidence considers both affordable housing need, and the need for self-build / custom build. The policy framework is sufficiently flexible to cater to affordable housing needs and self-build / custom build needs.
EDCLP/176 Hannah Post Barton Willmore obo Michelmersh Brick Holdings Plc	Draft Policy LP8 requires "5% of homes to be made available as serviced plots for self-build and custom housebuilding as part of an appropriate mix of dwellings on housing allocations of 20 or more dwellings". However, the Council has failed to provide any supporting evidence to demonstrate that this level of self and custom build housing is required over the Plan period. Indeed, the	The Council's register is published on the Council's website. The link can be found here: <u>http://consult.charnwood.gov.uk/portal/planning/self_build/self_build_reg</u> The latest demand figures were published in the Authority's Monitoring Report in December 2019.
	Self-build and Custom Housebuilding Act 2015 requires local planning authorities to keep a register of people seeking to buy land to build a home themselves. These figures have not been	Further demand data is set out in the SHMA, and will be included in the forthcoming Housing Needs Assessment work.

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	published by the Council in support of draft Policy LP8. In the absence of a robust evidence base, the Council cannot be considered justified in their approach for requiring 5% of properties to be delivered as self or custom build accommodation. As such, it is recommended that draft Policy LP8 should be deleted.	If necessary, this data will be used to update the policy. The policies in the local plan will be subject to viability testing later in the plan-making process.
EDCLP/178 Mark Rose Define obo Bloor Homes	Whilst it is acknowledged that self-build and custom house building is an element of the Government's housing strategy (as per the Self-build and Custom House building Act 2015), the imposition of a blanket 5% requirement as proposed in Policy LP8 is not	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and additional evidence provided through the Housing Needs Assessment.
	supported. NPPF indicates (para. 61) that relevant policies should be informed by a clearly evidenced need. The CLP refers to only "around 100	The concerns over the level of demand are noted, but given the nature of the issue, it may also be the case that the register is 'under-reporting' demand due to lack of awareness.
	people" on the self-build register. A 5% blanket requirement would, therefore, potentially realise a much number of self-build or custom houses than even the purported demand. However, those registered are not means tested, are often registered in a number of areas and usually have a specific aspiration (commonly a rural location as opposed to a housing development). Therefore, in reality the actual demand is likely to be significantly lower than the number of people on the register. Furthermore, such a prescriptive approach does not take account of localised need or the site and location specific constraints to delivery of specialist housing of this kind (e.g. allowing for independent construction access and infrastructure delivery).	The policies in the local plan will be subject to viability testing later in the plan-making process.
	Moreover, the policy requirement would need to tested in terms of the potential impact on the deliverability of development schemes. The unnecessary and unduly onerous blanket requirement could have a critical effect on the viability of new housing which would undermine the supply of deliverable housing and/or the realisation of other policy imperatives (notably affordable housing provision) compromising the overall deliverability of the CLP.	
EDCLP/179 Mark Rose Define obo Bloor Homes (HS37)	Whilst it is acknowledged that self-build and custom house building is an element of the Government's housing strategy (as per the Self-build and Custom House building Act 2015), the imposition of a blanket 5% requirement as proposed in Policy LP8 is not	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and additional evidence provided through the Housing Needs Assessment.
	supported. NPPF indicates (para. 61) that relevant policies should be informed by a clearly evidenced need. The CLP refers to only "around 100	The concerns over the level of demand are noted, but given the nature of the issue, it may also be the case that the register is 'under-reporting' demand due to lack of awareness.
	people" on the self-build register. A 5% blanket requirement would,	However, the Council does recognise the challenges of where sites have

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMM	ARY	OFFICER RESPONSE
	REPRESENTATION SUMM therefore, potentially realise a much number of houses than even the purported demand. How registered are not means tested, are often reg of areas and usually have a specific aspiration location as opposed to a housing development reality the actual demand is likely to be signific number of people on the register. Furthermore approach does not take account of localised of location specific constraints to delivery of spec- kind (e.g. allowing for independent construction infrastructure delivery). Moreover, the policy requirement would need the potential impact on the deliverability of dev The unnecessary and unduly onerous blanket have a critical effect on the viability of new how undermine the supply of deliverable housing a of other policy imperatives (notably affordable compromising the overall deliverability of the O Table 4.1 sets out the number of registrations Borough Council's Self-build and Custom Hou each base period and the number of serviced granted planning permission in each base per was provided by Charnwood Borough Council 2019.	f self-build or custom vever, those istered in a number a (commonly a rural t). Therefore, in cantly lower than the e, such a prescriptive eed or the site and cialist housing of this n access and to tested in terms of velopment schemes. requirement could using which would und/or the realisation housing provision) CLP. on Charnwood sebuilding Register in plots that have been iod. This information	OFFICER RESPONSE to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible. The policies in the local plan will be subject to viability testing later in the plan-making process. The constructive feedback on the policy is welcome. The Council is confident that the serviced plots currently granted planning permission have the necessary conditions and agreements in place to secure their delivery.
	Total number of registrations on the RegisterNumber or registrations on Part 1 or the RegisterBase Period 1 (up to and including 30/10/2016)44Base Period 2 (31/10/2016-30/10/2017)3532Base Period 3 (31/10/2017-30/10/2018)3831Base Period 4 (31/10/2018-30/10/2019)4641Base Period 5 (31/10/2019-present)	s serviced plots f granted	 However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. The information in this representation will be used to inform the next draft of the local plan. Where appropriate, the policy wording may be amended. The Council acknowledges the submission of Land Adjacent 55 Main Street in Ratcliffe on the Wreake, and for it to be allocated solely for self-build and custom-build housing. The Council will assess the site as part of the SHELAA and this will inform the next stage of the draft local plan.
	This data shows that there are 125 registration	ns the Council's Self-	

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	build and Custom Housebuilding Register and that 108 of these are on Part 1 of the Register. Table 4.1 also highlights that there have only been 74 serviced plots granted planning permission since the Council started its Self-build and Custom Housebuilding Register. There is therefore currently an unmet demand for 34 serviced plots ¹⁹ based on the number of registrations on Part 1 of the Council's Register.	
	It is unclear whether there are any provisions in place, such as planning conditions or planning obligations, to ensure that the 74 serviced plots that have been granted planning permission will come forward in accordance with the legal definition of self-build and custom housebuilding that is set out in the Self-build and Custom Housebuilding Act 2015 (As Amended). This raises considerable questions about whether all 74 plots will actually contribute towards the delivery of self- and custom-build housing in the Borough. This is because without there being mechanisms in place to secure the use of the 74 plots for self- and custom-build housing, the plots could be built out by a developer and then sold to another occupier. This development model would not comply with the legal definition of self-build and custom housebuilding. Therefore, the unmet demand for serviced plots may be greater than is suggested by the data in Table 4.1. Ultimately, this implies that the Council may need to grant planning permission for more than 34 serviced plots in order to meet the current demand for serviced plots on Part 1 of its Register.	
	Moreover, the data in Table 4.1 demonstrates that there has been a consistent and growing demand for serviced plots in the Borough during the first four base periods.	
	With this in mind, it is important to recognise that paragraph 61 of the NPPF establishes that the size, type and tenure of housing needed for different groups in the community, including people who wish to commission or build their own homes, should be assessed and reflected in planning policies. This is echoed in Paragraph 025 (Reference ID: 57-025-201760728) of the 'Self-build and Custom Housebuilding' section of the National Planning Practice.	
	The Council's general support for self-build and custom housebuilding is welcomed. However, it is considered that the general reliance of Draft Policy LP 8 on larger sites to provide	

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	serviced plots has the potential to create challenges with housing delivery due to the practicalities of simultaneously delivering market housing and self-build housing on the same site. This is because conflicts can arise in respect of working hours, health and safety and length of the different build programmes when the two types of housing are developed alongside each other on the same site at the same time.	
	 It is therefore considered that the following additional mechanisms should be added to Draft Policy LP 8 to strengthen its ability to secure the delivery of an adequate amount of serviced plots: Allocate sites solely for self-build and custom-build housing where landowners and promotors have expressed a willingness for this type of development to come forward on their land. Establish that where demand for self-build and custom-build housing is not being met in the Borough, small-scale opportunities for self-build and custom-build housing schemes on small sites in the Countryside adjacent to the existing built form of settlements (including those without Limits to Development) will be supported. 	
	This mixed approach towards providing serviced plots would help to increase the opportunities available to deliver self-build housing in the Borough, which would greatly assist the Council in being able to meet its statutory obligations in respect of self-build and custom housebuilding. In particular, the allocation of sites solely for self- and custom-build housing should improve the Council's ability to secure the delivery of this type of housing development over the plan period in comparison to the approach that is currently proposed in Draft Policy LP 8. This is because Draft Policy LP 8 would make it possible for serviced plots to be removed from larger developments if certain criteria are met; whereas, allocating sites solely for self- and custom- build housing would provide a greater degree of certainty that these sites would be used to provide serviced plots.	
	Additionally, the suggested approach towards supporting the delivery of serviced plots on small sites in the Countryside in circumstances when the demand for this type of housing is not being provided for on allocated sites and sites within the Limits to Development would improve the Council's ability to comply with the	

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	'duty to grant planning permission etc' throughout the plan period.	
	The above policy recommendations would therefore enable the Council to take a positive and proactive approach towards supporting the delivery of an adequate number of serviced plots to meet the demand for self-build and custom-build housing in the Borough.	
	Our client is willing to hold discussions with planning officers at Charnwood Borough Council about the potential for the land adjacent 55 Main Street in Ratcliffe on the Wreake to be allocated solely for self-build and custom-build housing.	
	The principle of allocating the site for self-build and custom-build residential development would accord paragraph 61 of the NPPF and with the Written Ministerial Statement of 28th November 2014 which outlines the Government's ambition to promote and "actively support the custom and self-build sector that will help people design and build their own home". Similarly, it would chime with the ambitions of the Housing White Paper 2017 which states "the Government wants to support the growth of custom built homes".	
EDCLP/188 Guy Longley Pegasus on behalf of Taylor	It is not considered that the requirement for large scale strategic sites to provide 5% of homes as serviced plots for self-build and custom housebuilding is justified. The supporting text associated with this policy notes that there are approximately 100 people who	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and additional evidence provided through the Housing Needs Assessment.
Wimpey Strategic Land	have registered an interest with the Council. 5% of all site allocations of 20 dwellings or more, excluding the SUE's as these already benefit from outline planning permission, equates to 349	The latest demand figures were published in the Authority's Monitoring Report in December 2019.
	dwellings. This is significantly in excess of the evidenced need that there is for these dwellings.	Further demand data is set out in the SHMA, and will be included in the forthcoming Housing Needs Assessment work.
	Additionally, bringing forward self-build and custom housebuilding on large scale strategic sites brings significant difficulties in terms of phasing of development, construction logistics and marketing.	There are various examples where a percentage requirement has been included in a policy in a local plan.
	The supporting text associated with this policy goes some way to acknowledge these constraints noting that "Our evidence suggests that most of these homes are likely to be on small sites"	However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots.
	(paragraph 5.43). The Inspector at the Blaby Local Plan Delivery DPD Examination	Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.
	acknowledged the difficulties in securing self-build units on larger	
	sites and made specific modifications to remove the proposed 821	The Council continues to refine the evidence base – it is preparing a

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	requirement from the policies (Inspector's report, December 2018, paras 73-78).For the reasons set out above it is considered that small sites are more appropriate for self-build and custom housebuilding and suitable sites for such development should be identified by the Council and allocated for this specific form of development.	Housing Needs Assessment and will be carrying out viability testing. If necessary, this data will be used to update the policy.
EDCLP/205 Guy Longley Pegasus obo Davidsons Development Ltd (Anstey) EDCLP/206 Guy Longley Pegasus obo Davidsons Development Ltd (Wymeswold) EDCLP/207 Guy Longley Pegasus obo Davidsons Development Ltd (Sileby) EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Sileby) EDCLP/208 Guy Longley Pegasus obo Davidsons Development Ltd (Field Head)	The draft policy seeks the provision of 5% self-build housing on all sites over 20 or more dwellings. Larger sites do not lend themselves to the provision of self-build housing due to practical site management issues and also that self-builders will not prefer to be located on a large development site. The Inspector at the Blaby Local Plan Delivery DPD Examination recognised these concerns and removed the requirement to provide self-build units on larger sites.	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and additional evidence provided through the Housing Needs Assessment. The latest demand figures were published in the Authority's Monitoring Report in December 2019. Further demand data is set out in the SHMA, and will be included in the forthcoming Housing Needs Assessment work. There are various examples where a percentage requirement has been included in a policy in a local plan. However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible. The Council continues to refine the evidence base – it is preparing a Housing Needs Assessment and will be carrying out viability testing. If necessary, this data will be used to update the policy.
EDCLP/209 Amy Smith Pegasus obo Jelsons	The draft policy seeks the provision of 5% self-build housing on all sites over 20 or more dwellings. Larger sites do not lend themselves to the provision of self-build housing due to practical site management issues and also that self-builders will not prefer to be located on a large development site. The Inspector at the Blaby Local Plan Delivery DPD Examination recognised these concerns and removed the requirement to provide self-build units on larger sites.	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and additional evidence provided through the Housing Needs Assessment. The latest demand figures were published in the Authority's Monitoring Report in December 2019. Further demand data is set out in the SHMA, and will be included in the forthcoming Housing Needs Assessment work.

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EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	The Local Plan should set out clearly the locations within the Borough where evidence justifies the requirement for 5% of plots to be made available for self-build and custom housebuilding. As currently drafted, the policy is not sufficiently precise to provide the type of plan-led certainty which is required, especially when applied as a blanket policy across the Borough. The policy also proposes that any unsold self-build plots should be offered to the Council or a Housing Association before being made available for market housing. Further consideration is required as to how this will work in practice, especially in respect of how this policy will interact with the general affordable housing requirements of Policy LP4. As currently drafted, this policy has the potential to not only significantly delay the delivery of housing on self-build plots, but also to result in a higher level of affordable housing being required on individual sites than is actually justified by the Local Plan or its supporting evidence. The Council also need to understand the practicalities of delivering serviced plots for self-build nousing as part of wider market sites, particularly on relatively smaller sites, given that the current proposed threshold is for schemes of only 20 dwellings which could feasibly be fully constructed in less than a year. The delay imposed by the current proposed policy before unsold plots could be released back to market housing will cause significant difficulties in the delivery of these sites. Furthermore, there is significant concern about the health and	 There are various examples where a percentage requirement has been included in a policy in a local plan. However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible. The Council continues to refine the evidence base – it is preparing a Housing Needs Assessment and will be carrying out viability testing. If necessary, this data will be used to update the policy. Noted – the Council acknowledges that further clarity is required on the mechanisms for plots being offered to the Council and/or Housing Associations. However, the Council does not agree that there is any conflict with the policy intention set out in Draft Policy LP1 or Draft Policy LP4. The policies can operate in tandem. Nevertheless, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.

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safety implications of such a policy, which is very likely to lead to multiple different developers and contractors working on a site at once, and at varying stages of the construction process, without the benefit of the coordinated management which comes from having a single developer working within a given phase of development. Rather than imposing a blanket policy requirement, local needs for custom and selfbuild housing should instead be met on sites allocated specifically for that purpose, with the support of the landowner, and through policies which permit small-scale and infill developments of these types of housing. Such an approach will ensure that the delivery of this housing is not at the expense of	
No Comment	Noted
Though supportive of aims to increase opportunities for self-build and custom build housing, Gladman object to the Policy as drafted. It is considered that the Policy is not justified by supported evidence and does not provide for an effective mechanism for responding to and meeting this type of housing need. The Draft Local Plan advises that there are around 100 people currently on the Council's Self-build register. It is however unclear how many on this register are from the Borough and how many are also on the register of another District. The supporting text advises that half of those on the register have no specific location in mind for the self-build homes whereas the other half identify an area of search. It is unclear whether proposed allocations fit in with this spatial pattern of need and as such provision secured through the Policy may not be responsive in meeting this need. Applying the requirements of draft Policy LP8 to the list of proposed sites to be allocated through the Local Plan, a total of 344 Self-build plots could be delivered through the policy (excluding windfall). This is significantly higher than current evidence of need, and it is further unclear whether there is the demand for this scale of provision over the plan period. The level of supply provided through the policy does not therefore appear justified. For larger sites there is the problem of how sites are to be delivered which is not addressed through the Policy or supporting text. The	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and additional evidence provided through the Housing Needs Assessment. The latest demand figures were published in the Authority's Monitoring Report in December 2019. Further demand data is set out in the SHMA, and will be included in the forthcoming Housing Needs Assessment work. However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.
	multiple different developers and contractors working on a site at once, and at varying stages of the construction process, without the benefit of the coordinated management which comes from having a single developer working within a given phase of development. Rather than imposing a blanket policy requirement, local needs for custom and selfbuild housing should instead be met on sites allocated specifically for that purpose, with the support of the landowner, and through policies which permit small-scale and infill developments of these types of housing. Such an approach will ensure that the delivery of this housing is not at the expense of market housing, leading to an overall increase in supply. No Comment Though supportive of aims to increase opportunities for self-build and custom build housing, Gladman object to the Policy as drafted. It is considered that the Policy is not justified by supported evidence and does not provide for an effective mechanism for responding to and meeting this type of housing need. The Draft Local Plan advises that there are around 100 people currently on the Council's Self-build register. It is however unclear how many on this register are from the Borough and how many are also on the register of another District. The supporting text advises that half of those on the register have no specific location in mind for the self-build homes whereas the other half identify an area of search. It is unclear whether proposed allocations fit in with this spatial pattern of need and as such provision secured through the Policy may not be responsive in meeting this need. Applying the requirements of draft Policy LP8 to the list of proposed sites to be allocated through the Local Plan, a total of 344 Self-build plots could be delivered through the policy (excluding windfall). This is significantly higher than current evidence of need, and it is further unclear whether there is the demand for this scale of provision over the plan period. The level of supply provided through the policy does not

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	with how larger sites are developed, such as the delivery of infrastructure and phasing. There are also security and health and safety issues of enabling third party access to an active construction site.	
	Based on the above, Gladman consider that a much more effective way of responding to the need for self-build and custom build housing is to set out a positive policy framework which promotes the delivery of such products through windfall development. Such an approach could be secured through the application of a more flexible approach to housing development beyond but adjoined to settlement boundaries as set out above in Section 5.3 of this representation.	
EDCLP/182 Pegasus obo David Wilson	The draft policy seeks the provision of 5% self-build housing on all sites over 20 or more dwellings. Larger sites do not lend themselves to the provision of self-build housing, due to practical	The Council does recognise the challenges of where sites have to deliver both market housing and self-build plots.
Homes	site management issues and also that self-builders prefer to be located on smaller development sites. The Inspector at the Blaby Local Plan Delivery DPD Examination recognised these concerns and removed the requirement to provide self-build units on larger sites (see paragraph 74 onwards of the Inspectors Report).	Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.
ELDCP/160 Persimmon Homes	Firstly, all policies should be supported by relevant and up to date evidence which should be adequate, proportionate and concentrated on supporting and justifying the policies concerned. Secondly, from a house builder's perspective; the timescale for	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and additional evidence provided through the Housing Needs Assessment.
	reversion of these plots to the original house builder should be as short as possible from the beginning of development. The subsequent delay in developing those plots presents further	The latest demand figures were published in the Authority's Monitoring Report in December 2019.
	practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical difficulties created if the original house builder has	Further demand data is set out in the SHMA, and will be included in the forthcoming Housing Needs Assessment work.
	completed the development and is required to return to site to build out plots which have not been sold to self & custom builders. The Council's suggested marketing period of at least 12 months is therefore too long and should be reduced.	The Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. There are a number of examples of sites developed across the country where these issues have been overcome.
		The feedback on the timescales associated with plots being made available for market housing is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.
EDCLP/247 Fisher German	We have concerns with the policy as proposed, which looks to enforce the delivery of self/custom build housing as a proportion of	The Council does recognise the challenges of where sites have to deliver
	eniorce the delivery of self/custom build housing as a proportion of	both market housing and self-build plots.

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obo Mr S W Taylor and Mr P A Taylor	residential developments. It is well established that such criteria are largely unworkable on modern housing developments and do not serve to provide additional units. In reality, such requirements may impede development unnecessarily, adding to developer burden without even delivering the necessary housing units. Self-builders do not want to buy serviced plots within or adjacent to a modern housing estate. Our experience is that for the most part that they are instead looking for more bespoke rural opportunities.	Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible. The feedback on policy is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.
EDCLP/ 244	While some housebuilders provide a custom build option as part of their product, this cannot be expected across all sites and the entire sector as it simply may not be within the business model of many housebuilders. Such requirements could therefore put off housebuilders from operating within the District and/or, unnecessarily delay development while policy requirements are negotiated. It is a further misconception to consider that because there is demand self-build plots on a self-build register, that they would all build their own property, even if suitable land was available. The reality is the difficulty and lack of skills needed to self-build will mean only a small percentage of those on the register will ever develop a self-build property. We have concerns with the policy as proposed, which looks to	The Council does recognise the challenges of where sites have to deliver
Fisher German obo Rearsby Trust	enforce the delivery of self/custom build housing as a proportion of residential developments. It is well established that such criteria are largely unworkable on modern housing developments and do not serve to provide additional units. In reality, such requirements may impede development unnecessarily, adding to developer burden without even delivering the necessary housing units. Self-builders generally do not want to buy serviced plots within or adjacent to a modern housing estate. Our experience is that for the most part that they are instead looking for more bespoke rural opportunities.	both market housing and self-build plots.Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.The feedback on policy is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.
	While some housebuilders provide a custom build option as part of their product, this cannot be expected across all sites and the entire sector as it simply may not be within the business model of many housebuilders. Such requirements could therefore put off housebuilders from operating within the District and/or, unnecessarily delay development while policy requirements are negotiated. It is a further misconception to consider that because there is demand self-build plots on a self-build register, that they would all build their own property, even if suitable land was available. The reality is the difficulty and lack of skills needed to	

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	self-build will mean only a small percentage of those on the register will ever develop a self-build property.	
EDCLP/239 Vivienne Barratt- Peacock	I am very much in favour of self-build projects so support this policy. I was very proud to grow up in a house that my father designed and built. Self builds encourage character, diversity and interest in settlements. They are also more affordable for those who are able and willing to put in the necessary work.	Noted – support is welcomed.
EDCLP/195 Greg Hutton Davidsons Developments Ltd	The draft policy seeks the provision of 5% self-build housing on all sites over 20 or more dwellings. Larger sites do not lend themselves to the provision of self-build housing due to practical site management issues and also that self-builders will not prefer to be located on a large development site. The Inspector at the Blaby Local Plan Delivery DPD Examination recognised these concerns and removed the requirement to provide self-build units on larger sites.	 The Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible. The feedback on policy is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.
EDCLP/204 Guy Longley Pegasu s obo Davidsons Development Ltd (Rothley)	The draft policy seeks the provision of 5% self-build housing on all sites over 20 or more dwellings. Larger sites do not lend themselves to the provision of self-build housing due to practical site management issues and also that self-builders will not prefer to be located on a large development site. The Inspector at the Blaby Local Plan Delivery DPD Examination recognised these concerns and removed the requirement to provide self-build units on larger sites.	 The Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible. The feedback on policy is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.
EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	It is not considered that the requirement for large scale strategic sites to provide 5% of homes as serviced plots for self-build and custom housebuilding is justified. The supporting text associated with this policy notes that there are approximately 100 people who have registered an interest with the Council. 5% of all site allocations of 20 dwellings or more, excluding the SUE's as these already benefit from outline planning permission, equates to 349 dwellings. This is significantly in excess of the evidenced need that there is for these dwellings. Additionally, bringing forward self build and custom housebuilding on large scale strategic sites brings significant difficulties in terms of phasing of development, construction logistics and marketing. The supporting text associated with this policy goes some way to	 The Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible. The feedback on policy is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.

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	acknowledge these constraints noting that "Our evidence suggests that most of these homes are likely to be on small sites" (paragraph 5.43).	
	For the reasons set out above it is considered that small sites are more appropriate for self build and custom housebuilding and suitable sites for such development should be identified by the Council and allocated for this specific form of development.	
EDCLP/177 Sue Green House Builders Federation	The HBF is supportive of proposals to encourage self & custom build for its potential additional contribution to overall HLS. It is noted that under the first Bullet Point of Draft Policy LP8 the Council will support proposals for self & custom build in locations considered suitable for housing in accordance with Draft Policy	As per the NPPF / PPG, the need is demonstrable from using a combination of the register, and additional evidence provided through the Housing Needs Assessment. The latest demand figures were published in the Authority's Monitoring
	LP1.	Report in December 2019.
	The HBF is not supportive of policy requirements for the inclusion of at least 5% serviced plots for self & custom build on allocated housing sites of 20 or more dwellings, which only changes housing	Further demand data is set out in the SHMA, and will be included in the forthcoming Housing Needs Assessment work.
	delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. The Council should not seek to place the burden for delivery of self	There are various examples where a percentage requirement has been included in a policy in a local plan.
	& custom build plots onto other parties contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self & custom build.	However, the Council does recognise the challenges of where sites have to deliver both market housing and self-build plots.
	The Council's proposed policy approach should not move beyond encouragement by seeking provision of self & custom build plots as part of the housing mix on allocated housing sites of 20 or more dwellings.	Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.
	All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed	The Council continues to refine the evidence base – it is preparing a Housing Needs Assessment and will be carrying out viability testing. If necessary, this data will be used to update the policy.
	tightly on supporting and justifying the policies concerned. The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites. It is also possible for individuals and	The Council would welcome the opportunity to engage further with the HBF, and, in particular, review examples from the development industry of effective and implementable policies pertaining to self-build and
	organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self & custom build but it cannot be	custom build.
	reliably translated into actual demand should such plots be made available. The Council has provided no evidence on the number of	
	entries on its Register in order to gauge the level of likely demand. 52 out of 73 allocated sites in Draft Policy LP3 will be affected by	

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	this policy requirement resulting in a potential over-supply.	
	The Council's policy approach should be realistic to ensure that where self & custom build plots are provided they are delivered and do not remain unsold. It is unlikely that the provision of self & custom build plots on allocated housing developments can be co- ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health & safety perspective it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. Is it the Council's intention to take enforcement action against self & custom builders if dwellings are not completed within 3 years of commencement of development on a self & custom build plot as set out in this policy?	
	If demand for plots is not realised there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS. As set out in Draft Policy LP8 where plots have been made available and marketed appropriately for at least 12 months and have not sold, the plot(s) may either remain on the open market as self & custom build or be offered to the Council or a Housing Association, before being made available for market housing. Is it the Council's intention to apply a non-implementation rate to its HLS for such occurrences?	
	Where plots are not sold it is important that the Council's policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self & custom builders. The Council's proposed marketing period of at least 12 months is too long.	
	As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council's responsibility to robustly	

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	viability test the Local Plan in order to set the cumulative impact of policy requirements so that most development is deliverable without further viability assessment negotiations and the deliverability of the Local Plan is not undermined.	
	Draft Policy LP8 may have a detrimental impact upon the level of affordable housing provision achieved on allocated housing developments. The Council may wish to adopt an aspirational approach in provision of plots to deliver self & custom build but this should not be pursued at the expense of delivering affordable housing.	
EDCLP/194 Guy Longley Pegasus on behalf of Hallam	The draft policy seeks the provision of 5% self-build housing on all sites over 20 or more dwellings. Larger sites do not lend themselves to the provision of self-build housing due to practical site management issues and also that self-builders will not prefer to	The Council does recognise the challenges of where sites have to deliver both market housing and self-build plots. Further research and analysis will take place prior to the next draft of the
Land Management	be located on a large development site. The Inspector at the Blaby Local Plan Delivery DPD Examination recognised these concerns and removed the requirement to provide self-build units on larger	local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.
	sites.	The feedback on policy is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.
Mr Gideon Cumming	I agree.	Noted – support is welcomed.
EDCLP/274 Avisons obo Jelsons	The draft policy seeks the provision of 5% self-build housing on all sites over 20 dwellings or more, unless evidence demonstrates that there is a lower level of demand. In our Client's view large housing	The Council does recognise the challenges of where sites have to deliver both market housing and self-build plots.
	sites do not lend themselves to the provision of self or custom build properties due to practical site management /construction issues. In addition, in Jelson's experience many self-builders would prefer to acquire small plots of land or plots within smaller scale housing	Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom build in the borough is as effective as possible.
	development (10 to 25 units) to build their own homes. We are aware that the Inspector who examined Blaby District Council's Local Plan shared these concerns and removed the policy requirement for developers to provide self and custom build units	The feedback on policy is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.
	on larger housing sites. With this in mind, we would suggest that Draft policy SWDPR is amended to make clear that this requirement relates to smaller housing development.	
EDCLP/276 Pegasus obo Wilson	The draft policy seeks the provision of 5% self-build housing on all sites over 20 or more dwellings. Larger sites do not lend themselves to the provision of self-build housing due to practical	The Council does recognise the challenges of where sites have to deliver both market housing and self-build plots.
Enterprises	site management issues and also that self-builders will not prefer to be located on a large development site. The Inspector at the Blaby 830	Further research and analysis will take place prior to the next draft of the local plan, to ensure that the policy framework for self-build and custom

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	Local Plan Delivery DPD Examination recognised these concerns and removed the requirement to provide self-build units on larger sites.	build in the borough is as effective as possible. The feedback on policy is noted. This information will be used to inform the next stage of the local plan and any potential amendment to Draft Policy LP8.
Do you agree that	Policy LP8 states that proposals for self and custom build will be supported but only where in accordance with the highly restrictive draft growth strategy. It is therefore unlikely to be effective as currently drafted. As Charnwood will be aware Local Authorities are under a severe obligation to meet the needs of serviced land and give suitable permissions to meet the identified demand (Section 1, 2 and 2A of the Self Building and Custom Housebuilding Act 2015, paragraph 61 footnote 61 of NPPF and reference 57-016 of PPG). A need which is best served through SME and smaller scale sites which can be developed around villages. Recommendation 5: Edit LP8 to include reference and support to smaller scale SME sites offering the ability to deliver up to 100% self-build and custom build land in order to meet the requirements of section 2 and 2A of the Self Build and Custom Housebuilding Act 2015. es in Multiple Occupation the proposed policy on houses in multiple occupation will achieves? If not, what changes to the policy would you propose and why	The Council considers that the current wording in Draft Policy LP1, Draft Policy LP4, and Draft Policy LP8 provides sufficient flexibility to allow small-sites to come forward for development, which are 100% self-build.
DCLP/119 Mr Dennis Marchant	The policy is supported.	Noted – support is welcomed.
DCLP/147 County Councillor Max Hunt	 Most communities in the Borough will be unaffected by the proposed policy. This submission applies to all affected areas under the Article 4 Direction. My experience is also built upon the severe effects on the <u>Ashby Road Estate</u>. This is an area of post-war council housing with a strong tradition of familial cohesion. However, as homes have migrated to the private sector they are overwhelmingly fall into 'buy to let' landlords. <u>This unique situation is destroying that community</u>. By reducing the threshold from 20% to 10% may be popularly conceived as reducing the number of HMOs or even future HMOs. In reality this will INCREASE the number of HMOs in 	 The Council understand that there are concerns about those areas where there are significant concentrations of existing HMOs. The policy has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough. The 10% threshold is supported by evidence – the Houses in Multiple Occupation Assessment Final Report (July 2019) notes that there are three reasons for the threshold: (i) the literature indicates that local communities become 'unbalanced' if more than 10% of properties are HMOs; (ii) the majority of local authorities assessed have adopted a 10% threshold; and (iii) most local stakeholders consider that a 10% threshold would be more appropriate.

CONSULTEE REPRESENTATION SUMMARY OFFICER RESPONSE all areas likely to be affected. -	RESPONSE NO/			
 all areas likely to be affected. The current 20% threshold never controlled the number of HMOs, the saturated areas have stayed saturated but they have flourished in other areas like the Holywell Drive area and the Ashby Road estate. Furthermore, there is no robust justification in any of the evidence (see RRR Consultants' report) for 10% except that it is not as bad as 20%. There is no robust or credible evidence of further demand for HMOs in either of the papers presented in support of the policy. All the evidence is to the contrary. The University has no plans to increase student numbers. There are more student bedrooms on campus than ever before in its history and have even added over 600 more this year. The number of student places in Purpose Built Student Accommodation (PBSA) off campus is higher than ever before and still growing is likely to respond to any further demand under draft planning policy LP10. The recent growth of Non-student HMOs is predicted to go into reverse due to the reduction in migrant labour from the EU as their economies grow and our regulations are tightened. The threshold test cannot be verified independently by 			REPRESENTATION SUMMARY	OFFICER RESPONSE
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prospective applicants or those affected because Borough			prospective applicants or those affected because Borough	
Council's figures are withheld from the public, apparently for DP				
reasons. Transparency in determining applications is a major				
consideration but despite all the work done (eg by Culora and Smith) no way has been found to present the evidence needed				
in open session.				
The proposed policy is unlikely to be effective in the most		•	•	
affected areas and cannot be monitored in a transparent way.			affected areas and cannot be monitored in a transparent way.	
It therefore carries a risk of being unsound.			-	
 Further unnecessary growth would be avoided if the proposed policy modified to apply a ZEBO percent threshold in all areas 		٠		
policy modified to apply a ZERO percent threshold in all areas under the Article 4 Direction and that flexibility is applied				
through conditions where there is an essential health,			• • • •	
occupational or social justification. It may also be permitted, by				
exception, where a dwelling is already sandwiched and unable				
to sell as a result. This approach is a <i>presumption not to allow</i>				
more HMOs, rather than the present system which has a presumption to allow.				
Should the proposed plan proceed with a threshold limit greater		•	Should the proposed plan proceed with a threshold limit greater	

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	 than zero, with the appropriate flexibility, then <u>an additional</u> <u>threshold</u> should apply the growth of HMOs <i>within the STREET concerned</i> <u>as well as</u> within the 100m RADIUS. The radius can be a very arbitrary measure which was demonstrated recently in Cotswold Close in Loughborough. In this case the radius had an excess of HMOs in the street but 100m radius included an area of two bed maisonettes which were invisible and inaccessible from the street in question. Needless to say the maisonettes tipped the scales The monitoring of any planning policy in regard to HMOs would be significantly improved and facilitated if an <u>Additional Licensing Scheme</u> was implemented in addition to the mandatory scheme. This should include all properties were are 3 or more people living as 2 or more households sharing facilities such as a bathroom or kitchen and at least one of the transition. 	
DCLP/230 Mr Gideon Cumming	 tenants pays rent. The Council should specify a parking survey methodology (recommend that the council refers to and adopts a policy similar to that set out by Lambeth Council – widely referred to as the Lambeth Method). The Council should set out an anticipated minimum parking requirement for HMO dwellings. Eg. One car per occupant, or similar. Refuse any application that is anticipated to generate an onstreet parking occupancy rate of greater than 85%, or where existing parking occupancy is greater than 85%. 'Guidelines on the Preparation of Parking Strategies and Management' (Institute of Highways and Transportation, 2006) states that "peak demand should not exceed 85% of supply at parking locations". Above a threshold of 85%, drivers searching for spaces tend to cause congestion, whilst below a level of 85%, a car park could be considered to be under-utilised. As such, an occupancy rate of 85% is considered as 'optimal' throughout this report as per the IHT guidance document. 	Noted – the Council acknowledges that on-street parking is a concern for residents. Draft Policy LP9 includes a component to assess the impact on on-street car parking. Any policy solutions and required mitigation must be in accordance with Leicestershire County Council's Highway Design Guide.
DCLP/251 Mr Rich Wilson	 I don't think the threshold is low enough. Even at 10% the added increase in population density and the impact of parking means that the well being, character and amenity of a community will be negatively impacted. There are major parking issues around HMOs and in Z6 it causes considerable frustration among residents. LHA can 	The 10% threshold is supported by evidence – the Houses in Multiple Occupation Assessment Final Report (July 2019) notes that there are three reasons for the threshold: (i) the literature indicates that local communities become 'unbalanced' if more than 10% of properties are HMOs; (ii) the majority of local authorities assessed have adopted a 10% threshold; and (iii) most local stakeholders consider that a 10% threshold

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	limit the number of permits granted but they can't magic extra parking spaces. The system and the metrics used are broken and the problems are not going away.	would be more appropriate. The planning system is an enabling system, which facilitates development that is acceptable and mitigates its impacts. Furthermore, the evidence indicates that HMOs are meeting a certain component of local housing needs in the borough. As such, to have a restrictive policy framework as described would reduce the Council's ability to meet local needs, and likely to be found 'unsound' as a policy.
DCLP/254 Mr Richard White	• I support the comments made by Cllr Max Hunt. I would add that some consideration must be give to applications for HMO status from long term owners of property in high density HMO areas (eg Kingfisher Estate) who wish to sell and move.	Noted – house sales are not strictly a matter for the draft local plan.
DCLP/357 Mr John Barton	 WRONG OBJECTIVE. Stop objecting to HMOs. Look, there are being freezing to death and dying on our streets. We need more truly affordable housing. I think the thing that really damages the character of our neighbourhoods is blokes seeping rough and begging outside casinos. 	Noted – the Council, through the draft local plan, is determined to meet the local housing needs for the borough.
LDCLP/02 Anonymous	 This is not in keeping with the local area but is due to young professionals from the university 	Noted – HMOs are often used by students seeking accommodation whilst reading at the University.
LDCLP/22 Anonymous	Yes, this appears to be a good policy	Noted – support is welcomed.
LDCLP/51 Anonymous	In certain areas but in a very controlled way.	Noted – Draft Policy LP9 aims to facilitate HMOs, but in a more controlled manner throughout the borough.
EDCLP/34 Cllr Mary Draycott	 It is now accepted that HMO's house students but as well single people due to the price of housing. The town though has too many of them when you add all the student halls as well as building such as Aumberry Gap. Many residents have moved out of Loughborough Town as a result. A key point that is not acceptable is for halls of residence and purpose built accommodation not being included. It should as it is not a true picture and discredits the planning process to the public. 	Halls of residence and purpose-built student accommodation are categorised in a different way and fall outside the parameters of Draft Policy LP9. However, Draft Policy LP10 provides the policy framework for managing the delivery of this type of accommodation.
EDCLP/74 Mr Hussain	Yes	Noted.
EDCLP/77 Nanpantan Ward Residents' Group	 Concerns over: Definition of a HiMO. Council records are such that a landlord asserting prior occupation by multiple students will be granted HiMO status. We have many examples of this both in this ward 	The Council appreciates the detailed and comprehensive response provided. There are a series of well-made points in the response, particularly those
	and in neighbouring areas. HiMOs do not contain a set number of students during an academic year. Many houses in this area	outlining the specific issues that can be generated by HMO properties, and how these impact on residents.

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RESPONSE NO/ CONSULTEE	 REPRESENTATION SUMMARY have been converted into larger HiMOs with double rooms and double beds. The Council is out of touch with this reality. Smaller and larger HiMOs have lost their meaning. Our solution to this problem is for all rented houses to be formally registered and given a maximum occupation number by the Council. 100 Metres radius. This is a circular measurement whilst our communities are more linear. The road or street is a more accurate measure of community, friendships and support. The Council's definition may be more accurate in certain areas of the town but suburban roads are a more accurate measure of local community and its disturbance by factors such as 'travelling noise', student car traffic, access to the University or college and parking nuisance. It is streets that maintain a mature and fixed balance of community. Our solution. Adopt either a circular measure or a linear measure, depending on the greater impact on the community. Sandwiching. We agree that sandwiching of a resident's house by student houses on both sides is potential for severe disturbance and, during holiday periods, likely to create a sense of abandonment and isolation. However, how is this to be monitored and measured? There is no Council source of information that identifies student houses in each street. A new purchaser, landlord or solicitor cannot get this information easily. Our solution, as before, is for all rental houses to be recorded. It is essential that this information is in the public realm. Social and Physical Character. We are pleased to see this issue addressed. We have all the issues raised in the Draft Local Plan. Property maintenance and repair issues. Unsightly appearance of rented houses and their gardens. Excess parking. ASB and crime. Rubbish Bin management, side waste and littering. Lack of bin management where there is no side access due to extensions. Proliferation of letting signs, one 	OFFICER RESPONSE Much of the response documents the impacts that arise from existing HMO properties. Many of these impacts are matters to be dealt with by planning enforcement, licencing, the Highways Authority, and in certain instances the police. Matters that pertain to the local plan and represent actions that could be explored will be considered and used to inform the next draft of the local plan. There are helpful comments relating to the application of the proposed policy criteria and how these could be modified (e.g. the 100m radius, and an appreciation of the linear pattern of certain streets / neighbourhoods). There are also several other matters raised, which are outside of the scope of the local plan. Realistically, many of the solutions proposed have no legal route through which they could be explored. Furthermore, some of the proposed solutions are likely to have unacceptable knock-on consequences for residents and have corresponding detrimental impacts on service provision.
	 purchaser, landlord or solicitor cannot get this information easily. <u>Our solution, as before, is for all rental houses to be</u> registered and for their maximum occupation number to be recorded. It is essential that this information is in the public realm. Social and Physical Character. We are pleased to see this issue addressed. We have all the issues raised in the Draft Local Plan. Property maintenance and repair issues. Unsightly appearance of rented houses and their gardens. Excess parking. ASB and crime. Rubbish Bin management, side waste 	
	and littering. Lack of bin management where there is no side access due to extensions. Proliferation of letting signs, one landlord's signs up for years on end. Overgrown gardens, some with persistent weeds that spread. We have already had some help from council officers to address these issues but we are told repeatedly that they do not have powers. Cars overhanging onto pavements. Not a Council issue but a Highways issue. Pernicious weeds spreading from gardens and undermining footpaths and gutters, not a CBC issue, it's an LCC Highways issue. Similarly shrubs and trees overhanging	

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	 paths. Or, no action taken on planning committee requirements for extended dropped kerbs to provide off-street parking. No extensions for kerbs allowed by LCC. Not a CBC issue. Once a valid complaint is made then it should be officers that take up issues with the County Council, not passed back to the individual. Our local council should be doing all in its power to ensure residents have a safe, attractive and supportive environment, even if that means CBC liaising with the County Council. Our solution is a one-stop approach to residents' problems. Concentration of HiMOs. "Officers working with Residents groups to address issues arising from concentrations of HiMOs". We have a very poor experience of getting officers to accept that high concentrations of student houses are damaging the community. Even in Ashleigh Drive where there are over 50% student lets officers are still recommending acceptance of applications for new student houses and extensions of small HiMOs to create larger HiMOs. Officers appear to accept that planning permission conditions can be ignored, such as a minimum number of off-street parking provision, dropped kerbs, addition of fences that reduce garden size, non-removal of rotting asbestos. Yet that same landlord can receive support from officers to extend another property in the same street. There needs to be a willingness on behalf of the Planning Department to put these issues into place by better training of its officers and a common approach to over development of family homes to provide student lets. Over developed houses will not be easy to rever to ordinary family homes in the future. We need a new provision, a 'stop order on new developments' for streets where student numbers far exceed permanent residents. Car Parking. Counting cars, out of hours, is not the answer to problems caused by student parking nor is it indicative of parking pressures on a street. There are at least 3000 student cars registered. The University and many more are not re	

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	 neighbouring residents. C4 HMO seen as mere 'rental machines' for landlords and agents who have little regard for the adverse impact of their properties and tenants on the long-standing community Further, HMOs were borne of a time when the alternative - purpose-built accommodation - was in short-supply; this is clearly no longer the case in Loughborough. There is more than enough purpose-built accommodation available (or under development) in the town to meet the numbers required to release most of the post-WW1 family homes back onto the market. It is our contention that the social groups (student and non-student) currently living in C4 HMO can be more than adequately catered-for by purpose-built accommodation, which typically is well-designed, energy efficient and comfortable. The proximity of parts of Nanpantan Ward to the University campus has resulted in too many of the semidetached & detached family homes in the Ward being converted into student housing, as HMOs; and has resulted in the following adverse impacts on the Ward: Loss of too many family homes, these are no longer available to purchase or rent by single households. Too many properties have lost their garages, as these have been converted into lettable rooms Too many properties have lost at his has been converted to off-street parking; access to rear gardens from the front of many properties has been lost as this has been converted to off-street parking; access to rear gardens for off-street parking, there are many instances where HMO tenants/visitors do not use the available off-street parking spaces or ther agrades, or there are insufficient off-street parking spaces where HMO tenants/visitors do not use the available off-street parking spaces, or there are insufficient off-street spaces for the number of cars at the HMO Teomaty instances where HMO tenants/visitors do not use the available off-street parking spaces. The result of the points above is that HMO tenant	

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CONSULTEE	 park on the pavement, obstructing pedestrians, or in positions that impede the safe flow of traffic, including buses and service vehicles. 8. Where front gardens of HMO have not been [totally] converted for parking, the standard of garden maintenance is often substandard with overgrown grass, shrubbery, and hedges. 9. The kerb-appeal of too many HMO is poor as the result of lack of maintenance and inadequate window curtains and/or blinds. 	
	The time has come to reverse this situation and return HMOs to family usage, therefore the NWRG Committee has a twin-track objective of (1) significantly reducing the number of HMOs in those parts of the Ward which currently suffer from an excessive number of HMOs and (2) preventing more family homes becoming HMOs, in any part of the Ward.	
	There are also some glaring anomalies that need to be addressed within the Local Plan.	
	Anomaly 1 - there is nothing to stop an existing HMO being extended to increase number of lettable rooms e.g. from 3 to 5 in an area where the percentage limit has already been reached - whereas planning permission would be refused to prevent a neighbouring building becoming an HMO with 3 lettable rooms. It is the view of the NWRG Committee that, in either case, the increase in the number lettable rooms would have adverse impacts on the neighbouring residents. Examples 25 Ashleigh Drive, 7 Derwent Drive	
	Anomaly 2 - off-street parking "Planning applications for houses in multiple occupation are determined using the standards for C3 taking account of the number of bedrooms. The Use Class C4 was introduced on 6 April 2010. An amendment was made to the Use Classes Order which effectively split the old Use Class C3 (dwellinghouses) class into 2 separate classes – Class C3 (dwellinghouses) and Class C4 (houses in multiple occupation). The Borough of Charnwood Local Plan Policy TR/18 was adopted in 2004 and therefore pre-dates the C4 use class and so includes no reference to it. However, had it been defined at the time of adoption it would have been the same standards as C3". The	
	impact of this anomaly is that the current maximum required number of off-street parking spaces (i.e. 3) does not relate to	

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CONSOLILL	number of lettable rooms.	
	 Whilst Draft Policies LP9 and LP10 go some way to meeting the requirements so NWRG; below is the NWRG Statement of Requirements in respect of HMOs 1. No property that was originally built* with a floor area of less than 110 square metres shall become an HMO. *If the property has been extended, the floor area ten years prior to the application for change of use shall apply 2. The acceptable % of HMO properties shall be defined as follows a. Zero % of properties (within 100m radius) where this is the existing situation b. A maximum of 5% of properties (within 100m radius) shall be HMO where the existing % is less than 5% but not zero c. A maximum of 10% of properties (within 100m radius) shall be HMO where the existing % is greater than 5% but less than 10% d. A maximum of 10% of properties (within 100m radius) shall be HMO where the existing % is greater than 5% but less than 10% d. A maximum of 10% of properties (within 100m radius) shall be HMO where the existing % is greater than 10% d. The %age of HMOs shall include all types of property in multiple occupancy including licenced and licenced HMOs, unregistered HMOs, halls of residence, hostels, hotels, blocks of flats/apartments, sheltered accommodation 4. All parties must work to quantifiable measures when deciding on HMO planning application and licencing matters; there must be no room for any individual involved to fudge or obfuscate. All decisions must be based on material facts that are agreed in advance by all parties; if there is any dispute about any item of fact this must be resolved before a decision can be made. 5. We need a system that is clearly understood and trusted, especially by lay people including residents and councillors viz.One Version of the Truth 6. For all HMO*, the required number of off-street parking spaces shall be defined as the number of lettable rooms. This should be a hard and fast rule that does not requ	
	planning permission/change of use should be refused.	

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	 8. Where the required number of off-street parking spaces cannot be provided without occupying more than 50% of a front or side garden, planning permission/change of use shall not be granted. 9. Within the number of HMO as defined above, no more than 50% shall be student-lets. 10. Where the % HMO limit, as in 2 above, has already been reached, planning permission to extend in order increase the number of lettable rooms in an existing HMO shall be refused. 11. Where 2 HMOs would sandwich a C3 property (in any direction) planning permission/change of use shall be refused for the second would-be HMO. 12. All bin storage and cycle storage should be at the side or rear of the property NOT the front; where this cannot be achieved permission/change of use shall be refused. 13. There should be an immediate moratorium on increasing the number of HMO in streets nominated by ward councillors 14. Perhaps the most ambitious requirement is for CBC to use their compulsory-purchase powers, to enforce planning policy by purchasing excess HMO properties in streets nominated by ward councillors, in consultation with long-term residents, and to resell them to housing associations with enduring covenants, restricting the properties to occupation by single households [families] in perpetuity. 	
	Charnwood is not the only LPA that need to deal with HMO, there are many examples of good practice which NWRG would like CBC to adopt as policies, for example "Generally, planning applications will not be approved in areas of predominantly single family dwellings . However, decisions on such applications will depend upon the particular characteristics of each scheme, and its impact on the amenity and character of the neighbourhood. The size of the development, number of bedspaces, provision of off-street car parking facilities and the development's proximity to nearby properties will be taken into account when assessing proposals in such locations." One of the Council's main concerns when assessing planning applications for HMO will be the impact the proposal would have on the character and appearance of an area. Traditionally, HMO have received a poor reputation in terms of their impact on the character of the street scene. This sometimes stems from poor standards of maintenance of the properties themselves and within the buildings curtilage (gardens and gates etc). Absent landlords	

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are often unaware of problems or are too slow to react to maintenance issues causing them to get worse. The occupants themselves often do not have the desire or the means to take care of areas of the building that fall outside their immediate living accommodation and see such responsibilities as falling on the landlord or other residents. Poor maintenance standards can sometimes have a considerable impact on an area's character. In addition to poor maintenance issues, the nature and operational requirements of HMO can sometimes cause harm to the character of an area. Examples of this include unsightly pipework that may be required to conform to specific requirements in terms of services, or unsightly fire escapes that may be required to meet Building Regulations. These often have a greater impact where surrounding properties are clearly absent of such features. Even things like diverse curtaining and multiple doorbells or letter boxes can detract from an area's character, particularly if done unsympathetically.

Therefore, if it is considered that a proposal for HMO in an area would cause harm to the character of that area it will be refused planning permission. Such decisions will be based on the individual merits of each proposal and the particular characteristics of each scheme, assessed against the overall street scene and character of an area.

"... the Council will seek to ensure that the premises the subject of a planning application are actually suitable for conversion to a HMO. Properties should be of sufficient size to accommodate the proposals and large enough to offer satisfactory levels of

the proposals and large enough to offer satisfactory levels accommodation for future residents.

"Normally, HMO will be restricted to **either detached or large semi detached properties (with detached being the preference)**, as these tend to have larger internal and external floor areas. Large terraced [Victorian & Edwardian] houses may also be considered but this will depend on their size and on the traffic and noise impact of the development."

"The Council will not accept proposals on properties with an original floor area of less than 115 sq metres, as this is considered to be the minimum size at which a property can be converted into an HMO and provide satisfactory accommodation for future residents. For the purposes of this guidance note, the Council will calculate the 'original floor area' as the area of the building10 years prior to the planning application. The fact that a property achieves the minimum required floor area does not in itself mean that it is

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	suitable for a conversion to an HMO." "Parking issues will be a major consideration when assessing a planning application for HMO, as parking will impact significantly on the character of an area/building and on the general amenity of residents. Any proposal that is considered to have a detrimental impact on highway safety or harm to amenity will not be permitted." "as a general principle, off-street car parking facilities should be provided for future occupants where this is possible. The type of resident to be accommodated, together with visitor demand and any requirements for staff parking should be considered when determining parking provision. "When assessing planning applications, the Council will seek to ensure that the proposals provide adequate levels of car parking to meet the future requirements of the likely occupants. Where possible, the car parking should be provided off street ." ", it is often the creation of forecourt car parking that has harmed the traditional layouts and setting of some streets, through the loss of boundary features and mature vegetation. As mentioned, the frontage of properties, including boundary features and gardens are significant to an area's character. Removal of front garden space for car parking can detrimentally harm the character of individual buildings and the street scene. Therefore, proposals that seek the intensification of existing buildings for HMO that would result in the loss of front gardens to car parking provision will be discouraged ." "The most appropriate location for HMO is along major transport routes and this often means that highway issues are particularly important in determining whether a proposal is or is not acceptable. Therefore, in addressing highway safety, it is important that: vehicles are able to enter and exit the parking area without any hazards being caused; the design of off-road parking and turning facilities meet appropriate highway standards" We also commend https://www.oxford.gov.uk/downloads/file/6317/amenit	

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	 All HMO licences shall be issued for a maximum 5-year period (ideally a 3-year period), at the end of the licence period the licencee will need to re-apply; if the existing %age of HMO properties is above the maximum as defined above the licence shall be refused. Where a property or landlord/agent is to be licenced for the first time the licence shall be issued for a 1-year probationary period. If, at any time during the probationary period, enforcement action is required in respect of the property, landlord or tenant(s) - by the police, CBC, the University or other responsible body – the licence shall not be renewed. 	
EDCLP/108 Sue Barry	Ok with this	Noted – support is welcomed.
EDCLP/121 Marie Birkinshaw	Think so	Noted
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We broadly agree but LP9 should prevent expansion of student housing 'off campus' and resist related new 'off campus' developments.	Draft Policy LP10 caters to the management of campus and purpose- built student accommodation.
EDCLP/164 Dr S.J.Bullman Storer & Ashby	SARG has extensive comment on Draft Policy LP9, related to the phrases highlighted in yellow in the relevant draft plan. We also refer to the report: Charnwood Borough Council - Houses in	The Council appreciates the detailed and comprehensive response provided.
Area Residents Group (SARG)	Multiple Occupation Assessment - Final Report - July 2019 (prepared by PRR Consultancy), which is on the CBC website here: <u>CBC HiMO Report</u> We abbreviate this report as HiMOAfr 2019a. It contains recommendations which fail to appear in this	There are a series of well-made points in the response, particularly those outlining the specific issues that can be generated by HMO properties, and how these impact on residents.
	Local Plan Draft, which are quoted in bold italics	Draft Policy LP9 has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what
	Point 5.54 says The threshold approach will apply both to new HMOs and to	happens to properties in the borough.
	conversions of existing small HMOs (3-6 unrelated people) to large HMOs (more than 6 unrelated people). It is good the test applies across all HMOs, but is undermined the	It is held that the criteria in Draft Policy LP9 provide the safeguards to address many of the issues raised.
	lack of being able to deduce where ALL such HMOs are.	The planning system is an enabling system, which facilitates development that is acceptable and mitigates its impacts.
	HMO Threshold - point 5.55 : Many comments arise from the bullet points for the proposed methodology	Furthermore, the evidence indicates that HMOs are meeting a certain component of local housing needs in the borough. As such, to have a restrictive policy framework as described would reduce the Council's ability to meet local needs, and likely to be found 'unsound' as a policy.
	Our preferred approach is that an assessment of the current 844	

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CONSULTEE	 concentration of houses in multiple occupation will be undertaken using the following methodology: a 100m radius will be measured from the centre of the proposed HMO for which the application applies; the number of HMOs will be measured as a proportion of the total number of residential properties within the area defined by the radius; See next but one comment. a property will be included in a calculation where the centre 	OFFICER RESPONSE Much of the response documents the impacts that arise from existing HMO properties. Many of these impacts are matters to be dealt with by planning enforcement, licencing, the Highways Authority, and in certain instances the police. Matters that pertain to the local plan and represent actions that could be explored will be considered and used to inform the next draft of the local plan. There are helpful comments relating to the application of the proposed policy criteria and how these could be modified (e.g. the 100m radius, and over-coming the issue of the assessment including natural/physical areas).
	 a property will be included in a calculation where the centre of the property falls within the area defined by the radius; This makes the assumption that impact on residents derives only from in-house activities. Very many, possibly the majority, of incidents arise from noise generated in the garden space. Where more than half the garden is included in the radius, it should be counted. Similarly, if it intersects more than 10% of the in-wall footprint, not just the "centre", whatever that means. each dwelling house within the area defined by the radius will be counted as a single property, regardless of the number of bedrooms; each HMO will be counted as a single property, regardless of the number of bedrooms; the number of known large HMOs within the area defined by the radius will be recorded and their impacts considered as part of the decision making process; This is contrary to the Recommendation of HiMOAfr 2019 para 6.4 on page 91/92: It is recommended that population density is considered in determining planning applications. This would determine the 	
	 likely number of people residing in existing and proposed HMOs rather than just the number of HMOs themselves. After highlighting which HMOs are within the relevant radius/other methods, it is a trivial matter to sum the total occupancy the licences aggregate to. This would then be compared to the un- licenced housing stock population using current Government statistical guidance for average residential occupation, again, aggregated. It is that ratio that should be limited to 10%. the extent to which natural or physical boundaries take up a proportion of the area defined by the radius will also be 	

considered; and

The wording/intention of this is unclear. If it is intended to introduce the recommendation from the same report (para 6.3) on p91: *it is recommended that where the number of residential properties is fewer than 80 the radius is expanded until it covers at least 80 properties. This would ensure that there was an average number of properties considered for each application*

...then it needs to say this explicitly. The recommendation is important. It avoids anomalies where non-building areas such as parks or roads form a significant fraction within a 100m radius of a particular property. Without it, there arises the unintended outcome that every residential area on a corner by a large road, park etc is automatically allowed to be allowed to be HMO-rich.

• halls of residence and purpose built student accommodation will not be included within the calculations, however, any halls of residence and purpose built student accommodation falling within the area defined by the radius will be recorded and the impacts considered as part of the decision making process. The highlighted section is not acceptable, as existing student halls have a very large and dominant effect on local residential amenity. The dominance of such halls needs to be acknowledged in assessing new HMO applications is particularly pertinent as residents are already subject to uncontrolled street noise that the council, police or university authorities have consistently failed to mitigate in any meaningful way over decades.

Again, this dominant effect can be easily acknowledged by noting the allowed occupation level of any such hall from the council planning application records - indeed, these are generally known and were, until recently, published along with the HMO licencing data. Recognition that such halls are "managed" could take the form of discounting the total number of bed spaces by, say, 50%. Those occupation figures can then be fed into the straightforward population density calculation recommended by HiMOAfr 2019 para 6.4 on page 91/92

Sandwiching – point 5.57

Our evidence has identified an issue with residential properties being sandwiched between two HMO properties. In these circumstances negative impacts from HMO properties can be exacerbated for occupants of the non-HMO property.

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	The residents of the non-HMO property may also feel isolated from other residential properties on the street. The draft policy seeks to resist an HMO where it would result in a residential property being sandwiched between two HMOs. This would not apply where the properties are separated by an intersecting road or where properties have a back to back relationship in different streets. Subdivided units will be considered on a case by case basis.	
	The recognition of the "HMO sandwich" effect is welcome. The notion that it would not apply because a neighbouring/adjacent property happens to be orientated at, say 90 degrees to the neighbour, and potentially having a postal address on an adjacent road could be, frankly, ludicrous. For example, 216 Ashby Rd is sandwiched by 2 Grove Rd and 214 Ashby Rd. To not acknowledge such would be both anomalous and a travesty. Again, this unintended outcome could be eliminated by including a phrase along the lines of:	
	"where properties are adjacent/contiguous, but with addresses on different streets, they will be assessed for the potential of being "sandwiched" in a similar manner." Back to back is more likely to be different, with front entrances on broadly parallel roads, but I think it unlikely that many would claim that they were "sandwiched" in such a circumstance. Subdivided units can be accounted for as in HiMOAfr 2019 para 6.4	
	<u>Car Parking Standards for HMOs point 5.62</u> HMOs by their nature have the potential to increase the number of cars associated with a single property and therefore to increase the pressure on on-street parking provision. This can lead to problems such as traffic obstructions (to pedestrians, emergency vehicles and refuse vehicles), congestion and harm to the visual amenity of the local area.	
	Decisions on any proposals would also have to take account of advice from the Local Highway Authority and the standards in the Leicestershire Highway Design Guide. We will work with our partners to seek adequate off-street parking and appropriate storage space for bikes in accordance with the	

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	County Council's Design Guide to assess whether there is adequate available on-street parking capacity.	
	We cannot find the cited Leicester County councils Design Guide for of-street parking on the LCC website. The Leicestershire Highway Design Guide only covers public highway issues. Looking more centrally, the Government Planning Portal for Parking Standards (off-street) currently fails to acknowledge the existence of HMO (Class C4) in Non-residential developments, nor does it cover the "HMO" status within residential parking, so cannot provide guidance here.	
	The Northampton Borough Council July 2019 draft parking guide does specifically cover the HMO designation on page 17, and says: 3.31 The starting point for considering planning applications for conversions to HMO should be the County Council's standard of one on-plot car parking space per bedroom and	
	one secure covered cycle parking space per bedroom. To ensure, in practical terms, that all the on-plot parking spaces are useable all of the time, and that on-street car parking demand is not generated. This standard has been modified, such that tandem car parking is not acceptable – all car	
	Such that tandem car parking is not acceptable – all car parking spaces have to be individually accessible. The inclusion of covered cycle parking provision in the Northampton HMO parking guide is most welcome, and not adequately covered by the CBC draft policy wording. We believe the CBC Local Plan should specifically cover the issue in a manner similar to Northampton Borough Council draft parking guide when applied to HMOs and assessing applications for such. It should also explicitly state which parking footprint guidelines should be adhered to, as these are not adequately specified by this draft.	
	Finally, we believe conditions should be imposed to prevent unfettered additional parking being "sold" via on-line peer-to-peer parking marketplaces such as yourparkingspace, justpark, parkonmydrive, parklet or gumtree. Such per-to-peer facilitators do not check if the advertiser rents or owns the space or if the space is communal, or if "car cramming" could result.	
	We think that HMO Planning Conditions should always be included so that landlord and tenant are forbidden to advertise parking places on the HMO curtilage via on-line peer-to-peer parking	
	848	

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	marketplaces, where such arrangements would increase car occupation above that of the number of bedrooms.	
	Finally, CBC should insist that all HMO landlords should regularise their position in the community by applying for a licence, for all sizes of HMO as defined by the government – including the smaller ones not requiring a CBC licence. They should be added to the published list so that anyone may assess the local density of HMOs and assess the likelihood of their presence on a planning application to create a new HMO from an existing domestic (C3) property. This would make point 5.54 far more tenable.	
EDCLP/165 Dr S.J.Bullman	I have extensive comment on Draft Policy LP9 I highlight the relevant draft plan document phrases used in yellow. I also refer to	The Council appreciates the detailed and comprehensive response provided.
	the report: Charnwood Borough Council - Houses in Multiple Occupation Assessment - Final Report - July 2019 (prepared by PRR Consultancy), which is on the CBC website here: <u>CBC HiMO</u> <u>Report</u>	There are a series of well-made points in the response, particularly those outlining the specific issues that can be generated by HMO properties, and how these impact on residents.
	I abbreviate this report as HiMOAfr 2019a. It contains recommendations which fail to appear in this Local Plan Draft, which I quote in bold italics	Draft Policy LP9 has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough.
	Point 5.54 says The threshold approach will apply both to new HMOs and to conversions	It is held that the criteria in Draft Policy LP9 provide the safeguards to address many of the issues raised.
	of existing small HMOs (3-6 unrelated people) to large HMOs (more than 6 unrelated people). It is good the test applies across all HMOs, but is undermined the lack of being able to deduce where ALL such HMOs are.	The planning system is an enabling system, which facilitates development that is acceptable and mitigates its impacts. Furthermore, the evidence indicates that HMOs are meeting a certain component of local housing needs in the borough. As such, to have a restrictive policy framework as described would reduce the Council's
	HMO Threshold - point 5.55 : Many comments arise from the bullet points for the proposed	ability to meet local needs, and likely to be found 'unsound' as a policy.
	methodology Our preferred approach is that an assessment of the current concentration of houses in multiple occupation will be undertaken using the following	Much of the response documents the impacts that arise from existing HMO properties. Many of these impacts are matters to be dealt with by planning enforcement, licencing, the Highways Authority, and in certain instances the police.
	 methodology: a 100m radius will be measured from the centre of the proposed HMO for which the application applies; the number of HMOs will be measured as a proportion of the total number of residential properties within the area defined 	Matters that pertain to the local plan and represent actions that could be explored will be considered and used to inform the next draft of the local plan. There are helpful comments relating to the application of the proposed policy criteria and how these could be modified (e.g. the 100m
<u> </u>	total number of residential properties within the area defined 849	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
RESPONSE NO/ CONSULTEE	 by the radius; See next but one comment. a property will be included in a calculation where the centre of the property falls within the area defined by the radius; This makes the assumption that impact on residents derives only from in-house activities. Very many, possibly the majority, of incidents arise from noise generated in the garden space. Where more than half the garden is included in the radius, it should be counted. Similarly, if it intersects more than 10% of the in-wall footprint, not just the "centre", whatever that means. each dwelling house within the area defined by the radius will be counted as a single property, regardless of the number of bedrooms; each HMO will be counted as a single property, regardless of the number of bedrooms; the number of bedrooms; the number of known large HMOs within the area defined by the radius will be recorded and their impacts considered as part of the decision making process; This is contrary to the Recommendation of HiMOAfr 2019 para 6.4 on page 91/92: It is recommended that population density is considered in determining planning applications. This would determine the likely number of people residing in existing and proposed HMOs rather than just the number of HMOs themselves. After highlighting which HMOs are within the relevant radius/other methods, it is a trivial matter to sum the total occupancy the licences aggregate to. This would then be compared to the un- licenced housing stock population using current Government statistical guidance for average residential occupation, again, 	OFFICER RESPONSE radius, and over-coming the issue of the assessment including natural/physical areas).
	licences aggregate to. This would then be compared to the un- licenced housing stock population using current Government	
	• the extent to which natural or physical boundaries take up a proportion of the area defined by the radius will also be considered; and The wording/intention of this is unclear. If it is intended to introduce the recommendation from the same report (para 6.3) on p91: it is recommended that where the number of residential properties is fewer than 80 the radius is expanded until it	
	covers at least 80 properties. This would ensure that there was	

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	an average number of properties considered for each application then it needs to say this explicitly. The recommendation is important. It avoids anomalies where non-building areas such as parks or roads form a significant fraction within a 100m radius of a particular property. Without it, there arises the unintended outcome that every residential area on a corner by a large road, park etc is automatically allowed to be allowed to be HMO-rich.	
	 halls of residence and purpose built student accommodation will not be included within the calculations, however, any halls of residence and purpose built student accommodation falling within the area defined by the radius will be recorded and the impacts considered as part of the decision making process. The highlighted section is not acceptable, as existing student halls have a very large and dominant effect on local residential amenity. The dominance of such halls needs to be acknowledged in assessing new HMO applications is particularly pertinent as residents are already subject to uncontrolled street noise that the council, police or university authorities have consistently failed to mitigate in any meaningful way over decades. Again, this dominant effect can be easily acknowledged by noting the allowed occupation level of any such hall from the council planning application records - indeed, these are generally known and were, until recently, published along with the HMO licencing data. Recognition that such halls are "managed" could take the form of discounting the total number of bed spaces by, say, 50%. Those occupation figures can then be fed into the straightforward population density calculation recommended by HiMOAfr 2019 para 6.4 on page 91/92 	
	Sandwiching – point 5.57 Our evidence has identified an issue with residential properties being sandwiched between two HMO properties. In these circumstances negative impacts from HMO properties can be exacerbated for occupants of the non-HMO property. The residents of the non-HMO property may also feel isolated from other residential properties on the street. The draft policy seeks to resist an HMO where it would result in a residential property being sandwiched between two HMOs. This would not apply where the properties are separated by an intersecting road or where properties have a back to back	

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	relationship in different streets. Subdivided units will be considered on a case by case basis.	
	The recognition of the "HMO sandwich" effect is welcome. The notion that it would not apply because a neighbouring/adjacent property happens to be orientated at, say 90 degrees to the neighbour, and potentially having a postal address on an adjacent road could be, frankly, ludicrous. For example, 216 Ashby Rd is sandwiched by 2 Grove Rd and 214 Ashby Rd.	
	To not acknowledge such would be both anomalous and a travesty. Again, this unintended outcome could be eliminated by including a phrase along the lines of : "where properties are adjacent/contiguous, but with addresses on different streets, they will be assessed for the potential of being "sandwiched" in a similar manner." Back to back is more likely to be different, with front entrances on broadly parallel roads, but I think it unlikely that many would claim that they were "sandwiched" in such a circumstance. Subdivided units can be accounted for as in HiMOAfr 2019 para 6.4	
	<u>Car Parking Standards for HMOs point 5.62</u> HMOs by their nature have the potential to increase the number of cars associated with a single property and therefore to increase the pressure on on-street parking provision. This can lead to problems such as traffic obstructions (to pedestrians, emergency vehicles and refuse vehicles), congestion and harm to the visual amenity of the local area.	
	Decisions on any proposals would also have to take account of advice from the Local Highway Authority and the standards in the Leicestershire Highway Design Guide. We will work with our partners to seek adequate off-street parking and appropriate storage space for bikes in accordance with the County Council's Design Guide to assess whether there is adequate available on-street parking capacity. I cannot find the cited Leicester County councils Design Guide for of-street parking on the LCC website. The Leicestershire Highway	
	Design Guide only covers public highway issues. Looking more centrally, the Government Planning Portal for Parking Standards (off-street) currently fails to acknowledge the existence of HMO	

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	(Class C4) in Non-residential developments, nor does it cover the "HMO" status within residential parking, so cannot provide guidance here.	
	The Northampton Borough Council July 2019 draft parking guide does specifically cover the HMO designation on page 17, and says: 3.31 The starting point for considering planning applications for conversions to HMO should be the County Council's standard of one on-plot car parking space per bedroom and one secure covered cycle parking space per bedroom. To ensure, in practical terms, that all the on-plot parking spaces are useable all of the time, and that on-street car parking demand is not generated. This standard has been modified, such that tandem car parking is not acceptable – all car parking spaces have to be individually accessible. The inclusion of covered cycle parking provision in the Northampton HMO parking guide is most welcome, and not adequately covered by the CBC draft policy wording. I believe the CBC Local Plan should specifically cover the issue in a manner similar to Northampton Borough Council draft parking guide when applied to HMOs and assessing applications for such. It should also explicitly state which parking footprint guidelines should be adhered to, as these are not adequately specified by this draft.	
	Finally I believe conditions should be imposed to prevent unfettered additional parking being "sold" via on-line peer-to-peer parking marketplaces such as yourparkingspace, justpark, parkonmydrive, parklet or gumtree. Such per-to-peer facilitators do not check if the advertiser rents or owns the space or if the space is communal, or if "car cramming" could result.	
	I think that HMO Planning Conditions should always be included so that landlord and tenant are forbidden to advertise parking places on the HMO curtilage via on-line peer-to-peer parking marketplaces, where such arrangements would increase car occupation above that of the number of bedrooms.	
	Finally, CBC should insist that all HMO landlords should regularise their position in the community by applying for a licence, for all sizes of HMO as defined by the government – including the smaller ones not requiring a CBC licence. They should be added to the	

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	published list so that anyone may assess the local density of HMOs and assess the likelihood of their presence on a planning application to create a new HMO from an existing domestic (C3) property. This would make point 5.54 far more tenable.	
EDCLP/226 Eleanor Hood	There is evidence that concentration of student housing in certain parts of town has exceeded the amount allowed eg town end of Forest Road. What confidence can residents have in you if you allow this to continue to happen? Stop it.	Noted – Draft Policy LP9 is designed to provide greater control over the future provision of HMO properties.
EDCLP/230 Barbara Fisher	HMOs in Loughborough should be completely banned henceforth. There are far too many already, completely altering the demographic in the town.	Noted – Draft Policy LP9 is designed to provide greater control over the future provision of HMO properties.
EDCLP/241 L.Tomalin	HMOs - there are far too many. They should be limited and the number of cars each HMO can have should be limited. There are far too many cars for 2 and 3 bedroom houses.	Noted – Draft Policy LP9 is designed to provide greater control over the future provision of HMO properties.
EDCLP/192 Severn Trent Water	Severn Trent are unable to comment specifically on policy LP9 Houses in Multiple Occupation. We would however note that where planning is being determined on any large scale retrofit development in particular student accommodation, the water supply and sewerage provision is compared with that of the buildings original use in terms of increased toilet / sinks as this will increase the peak run off depending on the scale and location of the development. It is therefore recommended that these areas are required to incorporate water efficiency measures, and would advise consideration of the lower options target outlined within building regulations.	Noted – the Council is mindful of the impact on water / sewerage infrastructure, and would welcome a further discussion with STW on how to effectively plan and manage this through the draft local plan and subsequent development management processes.
EDCLP/161 Councillors Gill Bolton and Alice Brennan Shelthorpe Ward	We believe that fewer houses should be designated as HMOs. Certain parts of the Borough have been over-run by such properties and it makes life quite challenging for local residents including noise and parking.	Noted – Draft Policy LP9 is designed to provide greater control over the future provision of HMO properties.
EDCLP/162 Councillors Kat Goddard and Dr Julie Bradshaw, Ashby Ward	• Our first concern is about the proposed changes to HMOs in Loughborough, a proposal that simply does not go far enough to protect the social cohesion in our community. Whilst we welcome any reduction in the concentration of HMOs, simply reducing the threshold to 10% in a 100-metre radius, will only cause HMOs to spread further across wards already saturated with HMOs.	The Council understand that there are concerns about those areas where there are significant concentrations of existing HMOs. The policy has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough.
	• Further to this, the current proposed 10% radius threshold does not address the situation where HMOs can be permitted in a linear fashion by virtue of the streets behind them being less	The 10% threshold is supported by evidence – the Houses in Multiple Occupation Assessment Final Report (July 2019) notes that there are three reasons for the threshold: (i) the literature indicates that local

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	 suitable for HMO applications. This could be because they are smaller more densely built, sheltered accommodation, or lack easy and quick walking links to the University Campus. In such cases, the streets at the front of the University are prey to many more than 10% or 20% HMOs on that street. Streets like New Ashby Road, Cotswold Close and Spinney Hill Drive are examples of those at higher risk of this issue. Due to this, it is our view that should the arbitrary 10% threshold be put in place, this should be applied to both the 100-metre radius and the street that the HMO may be awarded. As well as these HMO issues, it is important that a stronger commitment is made to protecting communities from the negative impacts of HMOs. Negating these impacts should be a responsibility that falls on landlords more strongly than it currently does. Landlords should be asked to sign up to a Charnwood wide scheme which would require a high standard of expectations from HMO properties, Landlords should be asked to sign up to these standards before granting HMO status on their properties. Too often, HMOs which will have a negative impact on the community are accepted simply on the grounds that the current 20% threshold has not been met. If a 10% threshold is to be implemented, then this should act as an upper limit (with both the radius and the street capacity considered), and not a target to meet. 	communities become 'unbalanced' if more than 10% of properties are HMOs; (ii) the majority of local authorities assessed have adopted a 10% threshold; and (iii) most local stakeholders consider that a 10% threshold would be more appropriate. The planning system is an enabling system, which facilitates development that is acceptable and mitigates its impacts. Furthermore, the evidence indicates that HMOs are meeting a certain component of local housing needs in the borough. As such, to have a restrictive policy framework as described would reduce the Council's ability to meet local needs, and likely to be found 'unsound' as a policy.
EDCLP/253 Ann Irving	 The building up of the campus has been at the expense of the town's modest housing stock. The HMO policy is laudable, if a little late, but the underlying problem is the fact that far too many family homes are left empty for a solid third of the year. This seems to be disgraceful when the Borough then has to find land to built 18,000 more. In some university towns, the existing built environment makes this impossible, and so the institution has to curtail its recruitment. There should be a stronger steer by the LPA to prevent more student housing off campus, and active encouragement for the university to recruit numbers that it can house itself. Student housing is now a commercial and lucrative business with considerable investor returns. You can let an empty shop to a charity until a new retailer takes over the premises, but you cannot let an empty student house to a homeless family. This issue seems so much at odds with local housing needs. 	 The Council understand that there are concerns about those areas where there are significant concentrations of existing HMOs. The policy has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough. The planning system is an enabling system, which facilitates development that is acceptable and mitigates its impacts. Furthermore, the evidence indicates that HMOs are meeting a certain component of local housing needs in the borough. As such, to have a restrictive policy framework as described would reduce the Council's ability to meet local needs, and likely to be found 'unsound' as a policy.

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EDCLP/ 245 Avison Young obo Loughborough University	 The University welcomes the inclusion of a policy which seeks to support the well-being, character and amenity of local areas, by preventing proposals for new HMOs or the conversion of existing properties to HMOs where this would give rise to the impacts identified in the policy. The University understands the-concerns that local residents have about the proliferation of HMOs in certain areas of Loughborough. It is therefore keen to work with the planning authority to ensure that its own proposals for redevelopment/refurbishment of student accommodation within the limits of the University campus can help relieve pressure on the market for HMOs in residential areas. 	Noted – the Council welcomes the opportunity to liaise with the University to discuss future proposals. The University will note the overall aims of the policy framework set out in the draft local plan, and should have specific reference to Draft Policy LP10, which details future requirements for campus and purpose-built student accommodation.
EDCLP/239 Vivienne Barratt- Peacock	Policy supported	Noted – support is welcomed.
EDCLP/213 Thomas Taylor Planning on behalf of Various Clients	 Whilst acknowledging that encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock PPG also encourages strategic policy-making authorities to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area. It is therefore disappointing that draft Policy LP9 adopts a negative approach towards such forms of housing and sets out the circumstances in which such proposals will be prevented. There is already an existing Article 4 Direction in Loughborough which removes the permitted development right for a change of use from a Use Class C3 dwellinghouse to a Use Class C4 HMO. Draft Policy LP9 seeks to reduce the threshold above which planning applications for HMO development would be refused. The acknowledged effect of this move as confirmed at paragraph ES11 of the Charnwood Borough Council Houses in 	 The Council has established a policy framework to meet the objectively assessed housing needs. The local housing needs have been derived from the Standard Methodology. Further evidence of need has been captured in the Housing Needs Assessment. The HNA explores the sub-categories of need, across various cohorts, including students, older persons, etc. The 10% threshold is supported by evidence – the Houses in Multiple Occupation Assessment Final Report (July 2019) notes that there are three reasons for the threshold: (i) the literature indicates that local communities become 'unbalanced' if more than 10% of properties are HMOs; (ii) the majority of local authorities assessed have adopted a 10% threshold; and (iii) most local stakeholders consider that a 10% threshold would be more appropriate. It is agreed that some of the areas of concern associated with HMOs are matters that can be addressed though planning enforcement, licensing, highways, and where necessary the police. However, Draft Policy LP9 has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough.
	Multiple Occupation Assessment (Final Report, July 2019) would be to "considerably decrease the proportion of planning applications being granted planning permission."	The evidence base created by the technical work prepared since 2017 has provided the Council with data, insight, and analysis to monitor

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	 Paragraph 5.56 of the draft Plan states that there is a need to maintain mixed and balanced communities, whilst not reducing the overall supply of HMOs across Loughborough and therefore limiting the housing available to meet the needs of the population. However, it appears that there has been no assessment as to what effect draft Policy LP9 would have on the overall provision of housing to meet the needs of the sectors of the community that the evidence demonstrates rely upon this type of housing. This is a significant shortcoming – particularly as in combination with draft Policy LP7 (Space Standards) it is likely that there will be a reduction in the number of properties within the housing stock that will be suitable for HMO use in any event. Changes Sought to Draft Policy LP9 Taking all the above points into consideration we consider that draft Policy LP9 should be removed from the Plan until it is at least justified on the basis of objective evidence which illustrates the quantitative and qualitative effect it is likely to have in terms of meeting the objectively assessed housing need of those sectors of the community who rely upon this type of housing. Alternatively, draft Policy LP9 should be amended to identify the circumstances under which planning applications for new houses in multiple occupation will be approved. There appears to be no credible, objective evidence to justify a reduction in the threshold from 20% to 10% HMO concentration on the basis of observed land-use or amenity harm in the plan area and in its absence, the threshold should be maintained at 20%. Furthermore, supporting paragraphs 5.55 – 5.64 identify a number of issues that in many circumstances are capable of being addressed through design and/or management. For example, noise issues can be controlled by internal room layouts, landscaping, the careful location of parking and pedestrian accesses and vary on a sit-by-site basis. Accumulations of waste and rubbish, litt	HMOs. Subject to issues of confidentiality and data protection, it is envisaged that the monitoring of the implementation of Draft Policy LP9 will be available and accessible by interest parties.

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	 through the Council's usual enforcement powers. Conditional control can also be exercised over the location and number of letting signs at a development on a case-by case basis. Draft Policy LP9 should be amended to acknowledge these matters and cast in the format of <i>"Proposals for new houses in multiple occupation or conversions to large houses in multiple occupation will only be approved where they"</i> A clear and precise set of criteria which could be used to assess proposals should then be set out as part of the policy itself as opposed to being contained in the supporting text. Each proposed development subject to draft Policy LP9 should be treated on its own merits and the requirement at bullet points 3 - 5 for consideration of the cumulative impact of proposals together with other HMO's is unreasonable and should be deleted. In any event, the cumulative impact of the proposal's effect is already addressed by the threshold test in the first bullet point of the draft policy. HMO use is essentially a residential use which in itself, is unlikely to damage the social and physical character and amenity of a street or residential area. The third bullet point in draft Policy LP9 which addresses these matters suggests otherwise - as a matter of principle - and does not set out any objective method of assessing these characteristics. This is a further shortcoming of draft Policy LP9 worded and provide little confidence that draft Policy LP9 will be applied in a fair or consistent manner and in a way that will give some certainty to the development management process. For example, paragraph 5.59 requires an assessment of the social and physical character and amenity of a area to be based upon evidence of existing standards of property maintenance and repair (however that is assessed). Similarly, "evidence" of "parking issues" would normally be of little or no weight where a proposal provides atter and amenity of an area to be based upon evidence of rexisting standards of property maintenance a	

 nearby. The final bullet point of paragraph 5.55 (the "methodology") states that the proximity of halls of residence and purpose bull student accommodation to a proposed HMO development will be considered as part of the decision making process. Given the Evidence Base findings and the diverse nature of the HMO market - including the non-student HMO sector, this seems to be an unjustified requirement and is, in reality more directly related to assessing (and limiting) the concentration of the type of persons (students) living close to an application site than the residential use of the proposed HMO itself that draft Policy LP9 claims to address. The final bullet point of paragraph 5.55 should therefore be deleted. Clearly, given the existence of an existing HMO, an increase in the information of HMC via generis) would not result in an increase in the projortion of HMC? is in a particular area and draft Policy LP9 should be amended to explicitly state that the "threshold" part of the policy will not apoly in those circumstances. Furthermore, proposals for conversions from existing and HMO of surge HMO of shore porder opportunities to positively address several of the issues raised within draft Policy LP9 and its supporting paragraphs and where those benefits would be secured (eg by condition), they represent material considerations that should be formally achrowledged by draft Policy LP9. Amending draft Policy LP9 in the positive y address several of the issues raised within draft Policy LP9. Amending draft Policy LP9 in the positive based approach is finally adopted in draft Policy LP9, and its supporting baragraphs and where those benefits would be secured (eg by condition) which the Council uses to base to decisions up (in all the information which the Council uses to base to decisions up (in all the information which the Council uses to base to decisions up (in all the information which the Council uses to base to decisions up (in all the information decision raking process and provi	RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Margaret SmidowiczOctober 2018 Properties with 5 residents need a licence. Result is that small HMOs are not small HMOs! No account of the numbers within the neighbouring properties is consideredthere are significant concentrations of existing HMOs.Margaret 		 "methodology") states that the proximity of halls of residence and purpose built student accommodation to a proposed HMO development will be considered as part of the decision making process. Given the Evidence Base findings and the diverse nature of the HMO market - including the non-student HMO sector, this seems to be an unjustified requirement and is, in reality more directly related to assessing (and limiting) the concentration of the type of persons (students) living close to an application site than the residential use of the proposed HMO itself that draft Policy LP9 claims to address. The final bullet point of paragraph 5.55 should therefore be deleted. Clearly, given the existence of an existing HMO, an increase in the intensity of its occupation where there is a material change of use to a "large HMO" (sui generis) would not result in an increase in the proportion of HMO's in a particular area and draft Policy LP9 should be amended to explicitly state that the "threshold" part of the policy will not apply in those circumstances. Furthermore, proposals for conversions from existing small HMOs to large HMOs often provide opportunities to positively address several of the issues raised within draft Policy LP9 and its supporting paragraphs and where those benefits would be secured (eg by condition), they represent material considerations that should be formally acknowledged by draft Policy LP9. Amending draft Policy LP9 in the positive way suggested above and by making specific reference to a criteria-based framework that acknowledges these factors would strike a better balance. Finally, in the event that a threshold-based approach is finally adopted in draft Policy LP9, all the information which the Council uses to base its decisions upon (ie all the information "inputs" implied in the "methodology" and set out in the policy itself) should be made publicly available and updated regularly on a transparent and consistent basis for all to see. This will aid applicants, neighbours	
the numbers within the neighbouring properties is considered Much of the response outlines the impacts that arise from existing HMO	Margaret	October 2018 Properties with 5 residents need a licence.	
	Smidowicz		Much of the response outlines the impacts that arise from existing HMO properties. Many of these impacts are matters to be dealt with by

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	 when deciding on approval of a new HMO or an extension to an existing property. The HMO market has expanded dramatically and the student HMO market continues to grow. The non-student market is growing and contains vulnerable, low income and migrant groups within the non-student market and also diverse professional groups. A transient population has affected complete community areas. This affects a good mile to two-mile radius of the centre of town. The threshold approach of 20 per cent has been significantly breached and within this area many streets now have between 50-90 % HMOs. Terraced and Smaller semi-detached post war properties have been allowed to double in size and affected street scenes, parking and general noise levels and waste problems, and landlords who rarely see their properties. There are also student families who stay for two or three years but the house reverts to an HMO when another family does not choose to live there. By the very nature of the transient student population it is difficult to keep track of. A small HMO (3-6) had an approval for up to 6 occupants, but increasingly three additional, usually double rooms are being added under permitted development rights and attics and garages converted, allowing for 12 residents and this has a huge impact on neighbours who find themselves sandwiched between rented houses and a transient community. There is no longer a sense of 'community' and very different values of what is acceptable. All rental properties should be formally registered and the number of residents allowed recorded. A 100m radius measured from the centre of the proposed HMO for which the application applies is easy to apply, however, not every street is the same and the number of HMOs and occupants will vary considerably. Ashleigh Drive for example backs on to a major student complex built so close to neighbouring properties that the conversations can be heard from open windows. Of the nineteen HMO properties, most house a	 planning enforcement, licencing, the Highways Authority, and in certain instances the police. Draft Policy LP9 has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough. It is held that the criteria in Draft Policy LP9 provide the safeguards to address many of the issues raised. Matters that pertain to the local plan and represent actions that could be explored will be considered and used to inform the next draft of the local plan. There are helpful comments relating to the application of the proposed policy criteria and how these could be modified. The planning system is an enabling system, which facilitates development that is acceptable and mitigates its impacts. Furthermore, the evidence indicates that HMOs are meeting a certain component of local housing needs in the borough. As such, to have a restrictive policy framework as described would reduce the Council's ability to meet local needs, and likely to be found 'unsound' as a policy. The evidence base created by the technical work prepared since 2017 has provided the Council with data, insight, and analysis to monitor HMOs. Subject to issues of confidentiality and data protection, it is envisaged that the monitoring of the implementation of Draft Policy LP9 will be available and accessible by interest parties.

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	 Population density The 100 m radius should also be accompanied by the number on a street and also the number of residents. Ten houses with 6 and 6 visitors is very different to ten houses with three occupants. We welcome students and their involvement in the community. The University has stated on numerous occasions that it will not be expanding. The 'balanced community' has already proved to be 'unbalanced!' There is adequate proof to support this statement. The PBSA blocks are still increasing and there are HMOs with spare capacity in various houses. The number of non-student HMOs is increasing across the Borough as the residents are more flexible with travel. As an example some 40 per cent of HMOs in Nanpantan are non-student. If the student population is not increasing and we have an unknown number of rooms in the blocks already in place and developing, then it is not required for students. Further development should be on campus and not doubling the size of properties that are more appropriate for young families. Is CBC implying that the HMOs will be for the non-student community – this is still a transient population? The noise is frequently coming from the back gardens of the larger HMOs and back to back does have a negative impact on adjacent streets. Subdivided units will be considered on a case by case basis. The recent trend to apply for 'studio flats' is a loop hole which the Government is now aware of and the same number of residents and vehicles and rubbish are still equivalent to an HMO. Noise - Both 5.57, 5.58 and 5.61 above are also very relevant when the sandwich filling has two properties either side applying to double in size. Can this be considered houses where one half has doubled in size sound-proofing, although requested has not been added as a condition. Social and physical Character - Sadly, too often a rental property is usually easily identifiable because of its unsightly appearance, excess par	

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	 frequent complaint. Highways, gutters not cleaned as cars parked for weeks without moving impact on street cleansing. Mainly LCC issue but their timing does not coincide with student holidays. CBC advertises that they wish to work with landlords - Known landlords who have had numerous complaints made about conditions to properties both internal and external are supported at the expense of resident families. Surely four years' of complaints by resident neighbour should result in some meaningful action? (evidence available). Car Parking - Parking pressures on the streets within the LE11 area has a serious impact on the community. Whilst it is appreciated that not every student has a car, the majority do. Of the 17,500 -18,000 students attending the University and College, some 6,000 live on campus and a large proportion leave their cars on adjacent streets for weeks without moving them. Of the 7,000 or so that live off campus some are fortunate to be able to park two cars in a driveway but the remaining 4 are parked as near to the house as possible, on kerbs and taking up space in front of other properties. In parts of Loughborough houses with 5 and 6 occupants with no vehicle spaces and yellow lines soon take over the nearest adjacent street. Parking on bends is the norm. Families are unable to park and this can cause problems with mothers with small children parking a considerable distance from the house carrying a child and shopping. Car alarms frequently go off in the day and night time. The owner nowhere near. Tradesman with equipment are unable to access a property etc. Roads are rarely free to clean properly. In Southfields, Nanpantan, and parts of the Outwoods Wards commuters – whether students or employees at the University, College, Endowed Schools or Town also add to the parking problem. CBC Planning Officers frequently quote LCC Highways comments as acceptable. However, when speaking to an LCC representative the answer is 'You have a planning committee and you know your area	

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	 I support the change in a 20 per cent threshold as we were the first to introduce it. However, it was not enforced, so now If the Town Centre and PBSA are to be filled to capacity why is it not possible to stipulate a 5 per cent threshold within a two-mile radius of the Town? 	
EDCLP 267 Loughborough Area Committee (Cllr Smidowicz)	 The balanced community has already been decimated in the LE11 area and research evidence has shown from CBC et al. (Ref: Prof D Smith HMO Report on CBC website (2016-18) and some 200 properties that have emerged in the past two years requiring certificates of lawfulness). University Town and City Centres who have developed blocks of PBSAs are now considering zero tolerance in specific areas using Article 4 where' no additional family property conversions or large extensions to HMOs will be approved'. (Ref Nottingham) 	Noted – The Council understand that there are concerns about those areas where there are significant concentrations of existing HMOs. The policy has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough. At present, the evidence does not support or justify a zero tolerance policy preventing future HMOs.
	 Article 4 could be involved for the whole concentration for LE11 areas to be considered. Young professionals will be more flexible and the number of rooms current and planned should be clearly identified and the planned apartment blocks and 'bed spaces' clearly stated on our website which has limited data on our licenced 5 roomed properties. 	
EDCLP 267 Loughborough Area Committee	 The consideration of re-establishing reference to instances where the impacts of new HMOs in the area with an already high concentration might be considered acceptable, preferably with similar wording to that used previously in the supplementary planning documentation from 2017 (4.11). The consideration of including purpose built student accommodation in the calculations for the threshold during the decision-making process on HMO applications. The consideration that there should be no more family homes in Loughborough converted into HMOs. 	Noted – The Council understand that there are concerns about those areas where there are significant concentrations of existing HMOs. The policy has been worded to ensure that in the future the situation is not exacerbated, and that there is greater control over what happens to properties in the borough. At present, the evidence does not support or justify a zero tolerance policy preventing future HMOs.
Q15 LP10 Campus and Purpose Built Student Accommodation	Do you have any comments on this draft policy? If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? Do you think we have missed something?	
DCLP/115 Mr Dennis	The policy is supported.	Noted – support is welcomed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Marchant		
DCLP/148 County Councillor Max Hunt	 Query regarding whether reference in the policy to the University's 'existing sustainable transport policy' is sufficiently robust. Conditions on implementing a sustainable transport plan should be applied to all Purpose Built Student Accommodation (PBSA). This includes the secure storage of cycles for all residents. Personal safety of tenants and security of their property is at greater risk in PBSAs and should also be included. 	 Noted – consideration will be given to whether alternative wording is required. Noted – consideration will be given to whether additional requirements in relation to sustainable transport are necessary. Noted – consideration will be given to whether additional requirements in relation to safety and security of tenants are necessary.
DCLP/236 Mr John Catt	 Developments for student accommodation should include a requirement to provide a covered and secure bicycle parking space for every occupant and restrictions on car use by occupants. 	 Noted – consideration will be given to whether these additional requirements are necessary.
LDCLP/02 Anonymous	 There should be more awareness of the needs of others and not just students. More public transport and cycle paths should be provided. 	 The aim of the policy is to encourage the provision of student accommodation on campus and in purpose built accommodation in accessible off-campus locations as both can help reduce pressures on residential areas. The wording of the policy identifies that any off-campus development should be in locations with good accessibility by cycle, public transport or on foot to the campus.
LDCLP/22 Anonymous	Also appears a good plan.	Noted – support is welcomed.
LDCLP/51 Anonymous	 All students should be on campus ideally to free up housing again in the towns and villages. 	 Loughborough University currently has c.6,300 bed spaces on campus which is sufficient to accommodate about half of Loughborough-based students. The aim of the policy is to encourage the provision of student accommodation on campus or in purpose built accommodation in accessible off-campus locations.
EDCLP/34 Cllr Mary Draycott	 There should be more transparency regarding Section 106 payments relating to on-campus developments. 	 The process for entering into and reporting on Section 106 agreements is the same for on-campus developments as for any other developments.
EDCLP/52 Shepshed Town Council	 Will there be clear and enforceable regulations on the type of cladding to be used on student high rise blocks? 	 This is a matter that is controlled through the Building Regulations regime.
EDCLP/108 Sue Barry	Ok with this	Noted – support is welcomed.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 We broadly agree. New student accommodation outside the campus (including conversions) must be discouraged. 	 Noted – support for the principles of the policy is welcomed. The aim of the policy is to encourage the provision of student accommodation on campus and in purpose built accommodation in accessible off-campus locations as both can help reduce pressures on residential areas.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/164 Dr S.J. Bullman Storer & Ashby Area Residents Group (SARG)	 As Loughborough is a small town, any part of the town could be argued to have "good accessibility by cycle, public transport or on foot to the Loughborough University and Loughborough College". An approach which can give a blanket acceptability is not acceptable. The locations closest to the campus are the areas which already have high concentrations of HMOs and other student accommodation. Residents in those areas are already subject to uncontrolled noise. The Loughborough University campus has ample room for more student accommodation and this is the most accessible location for it. In that context, we can see no excuse to enable any student hall expansion off-campus. 	 Noted – consideration will be given to whether policy should be more specific in terms of acceptable locations for off-campus development. This consideration will include factors such as the definition of accessible locations and existing distribution of student accommodation. The aim of the policy is to encourage the provision of student accommodation on campus and in purpose built accommodation in accessible off-campus locations as both can help reduce pressures on residential areas.
EDCLP/165 Dr S.J. Bullman	 As Loughborough is a small town, any part of the town could be argued to have "good accessibility by cycle, public transport or on foot to the Loughborough University and Loughborough College". An approach which can give a blanket acceptability is not acceptable. The locations closest to the campus are the areas which already have high concentrations of HMOs and other student accommodation. Residents in those areas are already subject to uncontrolled noise. The Loughborough University campus has ample room for more student accommodation and this is the most accessible location for it. In that context, I can see no excuse to enable any student hall expansion off-campus. 	 Noted – consideration will be given to whether policy should be more specific in terms of acceptable locations for off-campus development. This consideration will include factors such as the definition of accessible locations and existing distribution of student accommodation. The aim of the policy is to encourage the provision of student accommodation on campus and in purpose built accommodation in accessible off-campus locations as both can help reduce pressures on residential areas.
EDCLP/226 Eleanor Hood	 The university and the colleges are an important part of the town but neither of them should expect the town to bear a heavy burden in providing accommodation for their students. Shouldn't more accommodation be provided on their campuses? 	• Loughborough University currently has c.6,300 bed spaces on campus which is sufficient to accommodate about half of Loughborough-based students. The aim of the policy is to encourage the provision of student accommodation on campus or in purpose built accommodation in accessible off-campus locations as both can help reduce pressures on residential areas
EDCLP/230 Barbara Fisher EDCLP/ 245 Avison Young obo Loughborough University	 The university bus service is a much better service than those services provided in other parts of Loughborough. Welcomes the policy given it supports the principle of concentrating student accommodation within the defined limits of the campus and in sustainable locations close to the campus or within Loughborough town centre. Would welcome the developers of off campus student 	 Noted. Noted – support for the principles of the policy is welcomed. Noted – consideration will be given to whether reference to the scheme should be included in the policy or its reasoned justification. Noted – consideration will be given to whether clarification is required.

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	 accommodation signing up to the University's Street Support Scheme so as to minimise late night noise and disturbance caused by students. Would welcome greater clarity about what elements of the University's Travel Plan will be taken into account when assessing proposals for student accommodation on its campus. For example, is the intention to secure 'no car agreements' for each scheme or something else. 	
EDCLP/239 Vivienne Barratt- Peacock	Policy is supported.	 Noted – support is welcomed.
Do you have any	sies, Travellers and Travelling Showpeople comments on this draft policy?	
	e with the proposed policy please set out why and what alternative have missed something?	e approach would you suggest?
DCLP/67 and DCLP/68 Ms Suzanne Collington	Unsure where these sites would be and more detail needed.	Our evidence tells us that we do not need to provide any additional permanent sites for gypsies and travellers and show people. Discussions are underway with neighbouring local authorities to agree where suitable sites for transit sites should be provided.
DCLP/118 and DCLP/137 Mr Dennis Marchant	The policy is supported.	Support for the policy is welcomed.
DCLP/154 Mr David Campbell-Kelly	Consideration and allocation of Gypsy and Traveller sites should be on a cross boundary basis with other local authorities in the Housing Market Area	Discussions are underway with neighbouring local authorities to agree where suitable sites for transit sites should be provided.
DCLP/281 Harborough District Council	Welcome reference to working with other Leicestershire local authorities in identifying suitable sites for transit provision.	Comment is noted.
DCLP/359 Mr John Barton LDCLP/02 Anonymous	Unaware of any provision of sites for travellers but aware of illegal temporary camping. Sites should be located away from rubbish tips due to health concerns. The educational needs and service needs of the gypsy and traveller community need to be considered as there is no point in providing sites if services are not available.	The Local Plan sets out where provision for new sites is being made. The Council deals with any uauthorised encampments when they arise. The policy refers to the need for sites to be well related to local infrastructure and services including shops, schools and health facilities. The Borough Council also supports the work of the County Council's Multi Agency Traveller Unit (MATU) which works to provide access to health and education services.
LDCLP/22 Anonymous LDCLP/34 Anonymous	There needs to be consultation with local people Travelling showpeople usually winter in one location for generations and are accepted by the local community.	Consultation on the plan's policies will take place and local people will also have the opportunity to comment on any planning application. Comment noted.

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LDCLP/51 Anonymous EDCLP/34 Cllr Mary Draycott	 A few sites in under utilised areas which are well policed and controlled to stop the free for all we see occasionally. Why is the Local Plan proposing thousands of extra properties across the Borough for those who live in houses but no extra for gypsies, travellers and travelling Show people? There needs to be some provision by setting out the number of new pitches and plots based on real evidence. To say "no additional need in Charnwood for up to 2036" is not acceptable and I question what that is based on. More pitches and plots for non house dwellers just like housing is needed. Figures of local need are available at Government level. Welcome the inclusion of sites for Gypsies, Travellers and Travelling Show people but the figures seem very small and will take decades to deliver. Again with such a large borough surely more sites could be made available and in decent places. 	The Local Plan sets out where provision for new sites is being made. The Council deals with any unauthorised encampments when they arise. The Government's Planning Policy for Travellers Sites (2015) requires local authorities to make provision for gypsies, travellers and show people based on need. Our policy is based on robust evidence from an accommodation assessment published in May 2017. Provision for new permanent pitches and plots for travelling showpeople has been made through the planning process and will be delivered as an integral part of the development of sustainable urban extensions.
EDCLP/52 Shepshed Town Council	The evidence that shows that there are no additional needs for gypsy and travellers or travelling show people in Charnwood makes it more important that the gypsy and traveller pitches designated for the West of Loughborough SUE are implemented. Would you please give an update on progress of these developments.	The Section 106 Agreement for the West Loughborough SUE requires the owners to make available land for a gypsy and traveller site prior to the occupation of the 1300 th dwelling while land should be reserved for travelling showpeople land prior to the occupation of the 2050 th dwelling. Our current trajectory for the delivery of housing at West Loughborough SUE is that 1300 dwellings would have been built by 2027 while 2050 dwellings would be provided by 2030
EDCLP/108 Sue Barry	Need to make gypsies and travellers responsible for the area and fined if they do not.	The Borough Council supports the work of the County Council's Multi Agency Traveller Unit (MATU) which seeks to apply consistent application of best practice, legislation and guidance.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	Agree with the policy.	Support for the policy is noted.
EDCLP/221 Nick Baker Lichfields on behalf of CEG	CEG notes that the Council has not reviewed the provision of plots and pitches within the Core Strategy, which principally relies on provision within the established SUE locations. CEG suggests that it would be appropriate for the quantum, location and nature of provision to be reviewed as part of the plan preparation process.	The current planning provision for gypsies, travellers and travelling show people was set out in the adopted Core Strategy. This policy was subject to independent examination and formed the basis for detailed requirements set out in Section 106 Agreements for the planning permissions for the sustainable urban extensions. These locations were considered suitable because they satisfied the Government's policy

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	We remain of the view that the needs of travelling showpeople would be better met in locations which are closer to Loughborough and better able to accommodate the access requirements and maintenance activity associated with this provision.	guidance, by facilitating access to education, health, welfare and employment while protecting local amenity and the local environment. We do not agree that a review is necessary or additional sites needed in accordance with our most recent evidence.
	Some additional provision for gypsies, travellers and travelling show people (above current identified need) should be set out in drafting detailed site allocation policies. Doing so would be consistent with the approach taken elsewhere in the plan to achieve a degree of flexibility, for example in planning for additional homes over the plan period (above identified housing need).	
EDCLP/226 Eleanor Hood	No Comment	Noted
EDLCP/231 CBC Neighbourhoods and Community	Policy is vague in relation to the management of sites for travelling showpeople and the use of these sites. The policy for transit sites is vague and does not address specific needs/requirements.	The management arrangements for sites would be the responsibility of Leicestershire County Council with monitoring by the County Council's Multi Agency Traveller Unit (MATU).
Well Being		Discussions are ongoing with neighbouring authorities regarding the provision of transit sites and the outcome of these discussions will be set out in the Local Plan.
EDCLP/239 Vivienne Barratt- Peacock	Policy supported. It would be good to set down how any problems will be dealt with (e.g. noise, litter etc)	Support is noted. It is intended that sites would be managed by Leicestershire County Council.
DCLP 266 Leicester City Council	The City Council acknowledges and welcomes that Charnwood have worked jointly with neighbouring authorities on the gypsy and traveller evidence base through the Leicester City and Leicestershire Gypsy, Traveller and Travelling Show people Accommodation Assessment 2017.	Leicestershire local authorities have cooperated effectively on the establishment of a common evidence base.
DCLP 266 Leicester City Council	There is a recommendation in the 2017 study that "Each local authority should consider a review of the evidence base relating to unauthorised encampments in the future once there is a robust post-PPTS (2015) evidence base. This will establish whether there is a need for further investment in formal transit sites or emergency	All local authorities have access to information on unauthorised encampments from the County Council's Multi Agency Traveller Unit's (MATU) database which records details of all unauthorised encampments.
	stopping places". (para 7.136). A partial review would ensure that the Local Plan would address the full extent to the need for transit provision.	The Borough Council is working with neighbouring authorities to assess the suitability of sites for transit provision.
	The City Council has undertaken a partial review to address this recommendation in the 2017 study for the City as the City's need for transit provision is less dependent on the surrounding Districts.	Reference to the City's need for transit provision being less dependent on the surrounding Districts is noted.
DCLP 266	The City Council is seeking to address the identified need in the	Leicestershire local authorities have cooperated effectively on the

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Leicester City Council	GTAA for Gypsy and Traveller provision through our Local Plan process.	establishment of a common evidence base fo the provision of gypsy and traveller sites.
	The City is constrained by a tight administrative boundary and has high levels of need for housing and employment land. This makes the scope of what we need to plan for in the City challenging, whilst we will do everything we can to address provision in the City it is appropriate to flag up that local planning authorities have a duty to co-operate on planning issues that cross administrative boundaries including G&T sites.	We are currently working collaboratively to consider suitable sites for the provision of transit sites in accordance with the 2017 Accommodation Needs Assessment.
Chapter 6 –	Employment and Regeneration	
Do you have any If you don't agree	ting Employment Needs comments on this draft policy? with the proposed policy please set out why and what alternative have missed something?	e approach would you suggest?
DCLP/35 Ms Suzanne Collington	Impact of flooding in Sileby means people won't be able to come to live and work there as they can't access the village	The Rivers Soar and Wreake flow through Charnwood creating flood risk which requires careful management. The draft local plan seeks to direct development to the areas with the lowest risk of flooding. Addressing existing flooding issues requires a comprehensive response, of which the local plan is only a part.
DCLP/133 Mr Martin Peters	Sport is mentioned as a significant area of economic activity, but tourism and the visitor economy are probably higher value to the economy and should also be referenced.	The importance of tourism is recognised throughout the draft Local Plan and there is a specific section at 6.46 which recognises the importance to our economy.
DCLP/162 County Councillor Max Hunt	 Support the promotion of Priority Neighbourhoods but questions whether this will stand to 2036, the features of a Priority Neighbourhood need to be defined Para 6.36 seeks describes two very broad and ill-defined areas in Loughborough and gives the impression that these areas are destined to remain afflicted 	Priority Neighbourhoods are based upon indices of deprivation published by Government at a local area level (Lower-layer Super Output Areas) across England since 2000. The area information has been used to define the neighbourhoods and a further explanation could be added to the supporting text.
DCLP/319 Mr Phil Sheppard	 Policy hits all the right buttons, could support innovation from the University by specifying development for scaling-up businesses incubated on campus Supporting expansion of University campus in town centre would enable people with disadvantaged backgrounds to connect with skills and opportunities offered by the University. If everything is on campus, it exists in its own bubble, not affecting the local population Significant role for Charnwood BC stimulating and coordinating greater interaction between town and gown at the grassroots level, e.g. the establishment of a University college within the town, copying the model of Oxbridge 	The Loughborough Science and Enterprise Park strategic allocation and associated policies in the Core Strategy are to be carried forward to the new Local Plan. This includes the provision of grow-on space. Greater connectivity between the university and town centre would be welcomed and of benefit to both. The expansion of the university campus would require a desire to do so by the university.

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DCLP/407 Carbide Properties Ltd	 Broadly support the site allocations in Draft Policy LP12 and the criteria which support the release of unallocated sites Do not support the criteria "supporting major employment opportunities in location where they reduce journey to work by car" which is considered at odds with the NPPF and should be amended to reflect the Framework, paras 84 and 103. 	The support for the policy is welcomed. The wording to point 7 is similar to that in Policy CS6 in the adopted Core Strategy and seeks to encourage opportunities for people to walk, cycle and use public transport rather than use their cars to access employment.
LDCLP/02 Anonymous	 More private employment and public services should be provided, not just the new Science Park Encourage the private sector, not just the University Increase public services funding and development 	The draft Local Plan makes provision for 77.88 hectares of land for employment purposes at a variety of sites around the Borough, in addition to the land to be provided at the Loughborough University Science and Enterprise Park. Public services and their funding are an issue which involve many factors beyond the scope of the Local Plan; however, the provision of services and facilities is recognised as an important component of sustainable development and we are in on-going dialogue with infrastructure providers to ensure the needs of our community can be met.
LDCLP/34 Anonymous	 Will this future depend upon Brexit and its ramifications? 	The influence of Brexit and any impact which may result is unknown at present and is unlikely to be known for several years. Delays in the Local Plan until the ramifications are known is not considered to best meet the needs of our community.
LDCLP/51 Anonymous	 Regeneration is the key for the next 10 years then look again at expansion if needed 	Regeneration is an important element of the plan; however, new business premises are also needed to allow companies to expand or locate top more suitable, modern premises.
EDCLP/52 Shepshed Town Council	 There are no details of any sites for businesses in Shepshed, though the plan states "Most new business will be located at Loughborough and Shepshed" 	The draft Local Plan identifies employment sites at the West of Loughborough Sustainable Urban extension and at the Science and Enterprise Park which are in close proximity to Shepshed. Consideration will be given to provision of potential employment land at Shepshed.
EDCLP/74 Mr Hussain	 Little consideration for entrepreneurial support for small businesses operating on the outskirts of the town centre who require grants "not loans" to change shopfronts and make them more attractive and modern Little direction on manufacturing types the borough is trying to encourage, and incentives offered other than just land to build units on. Who is being targeted here and what actions have been taken in targeting? 	Loughborough has been invited to bid for up to £25 million of the government's Town Deal funding. This aims to regenerate town centres, boost businesses and improve infrastructure and connectivity. This may be a source of funding which could be used for such public realm improvements. The draft Local Plan identifies the desire to support science and innovation activity in areas such as advanced engineering, bioscience
	 Should encourage manufacturing by investment in plant machinery for manufacturing plants to service the Borough and wider area and encourage relocation The investment strategy model is failed because there is no meaningful action, i.e. investment not just of land but also 	and pharmaceuticals. The Local Plan is a land-use plan and whilst investment can be supported it is not the primary tool for investment proposals. A new Economic Development Strategy was produced in 2018 with the

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	 funding manufacturing project/s that are good for creating local jobs Should invest in the borough to create skilled manufacturing jobs rather than hope a manufacturing plant from another area wants to set up operations in Charnwood 	"inCharnwood" initiative launched to encourage inward investment and business growth. A flexible supply of land which meets the needs of business can attract new inward investment and encourage economic growth.
	 Borough can save money from disrupting the environment through its current housing strategies and district shopping centres and utilise that money to create manufacturing plants and a meaningful work environment for local people. This is far more important than building social housing which will take too before it reaches full potential Time for different options for the socioeconomic structure of the borough and suitable plans to enhance people's lives and claim a fair market share of manufacturing aspiration Misses the will to radically change the state of play in Charnwood for quality manufacturing SME construction firms can be put to better use and serve the community, i.e. complete home renovations for social housing purposes and this area is not even mentioned. Hundreds of properties require full modernisation and the borough is not engaging with construction SMEs 	The use of SME construction firms to renovate social housing would require a change in approach to addressing social housing need in the Borough.
EDCLP/26 East Midlands Airport	 East Midlands Airport makes an important contribution to employment and the economy for some Charnwood residents 	The importance of the Strategic Growth Plan's International Gateway is referenced throughout the plan. East Midlands Airport is recognised as providing major employment opportunities for the Gateway.
EDCLP/95 Barrow Upon Soar Parish Council	 Barrow upon Soar Neighbourhood Plan allocates 2ha of land to the south of Sileby Lane for employment. The draft Plan should align this allocation or refer to the Neighbourhood Plan's allocation. 	Draft Policy LP1 supports new built development on sites identified in neighbourhood plans to meet local priorities. Consideration will be given to better reflecting this support in the plan.
EDCLP/108 Sue Barry	 Apprenticeships, part time/ full time flexible contracts and better working facilities are needed Care workers should be better paid as they support society YTS Scheme in late 80's was a good way into work for young people not going to University. 	The Local Plan is a land-use plan and whilst better training, contracts and pay can be supported it is not the primary tool for delivering this. A new Economic Development Strategy was produced in 2018 and looks to ensure that the local workforce has access to good education and skills training.
EDCLP/121 Marie Birkinshaw	 Promote jobs in a circular economy for local food and produce and consumption – community gardens etc. 	The Local Plan requires the provision of open space, including greenspace and allotments, in association with new residential development. This could be utilised to provide community gardens.
EDCLP/125 Tim Birkinshaw	 Concerned about the expansion of employment land into open countryside west of Snell's Nook Lane All employment land should have good access by foot and by bike, and also by public transport 	The land west of Snell's Nook Lane is already allocated for expansion of the Science and Enterprise Park through the adopted Core Strategy and the allocation is to be carried forward.
	 Regeneration of employment land is essential 	Draft Policy LP3 seeks to support employment in locations where they

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	 Policies still pursuing economic growth with unsustainable land and energy use which are not possible if we are to counter climate change and provide zero-carbon economy Nothing about sustainability or moving to a 'circular 	reduce journeys to work by car. However, given the rural nature of some areas of the Borough this is not always possible when supporting the rural economy.
	economy', completely contrary to later sections in Draft Plan	Regeneration of existing land is an important aim of the Local Plan and Draft Policy LP1 supports the regeneration of urban areas and the efficient use of brownfield land. However, jobs are forecast to increase and to enable businesses to access suitable premises we need to provide a flexible supply of land.
		The Local Plan should be read as a whole, policies in other sections such as encouraging sustainable construction and transport are still relevant.
EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	 Quantum should be a minimum, not maximum 	The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. On this basis the policy requires "up to 77.8 hectares" and is similar in approach to the adopted Core Strategy.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 In general agreement with the policy and approach to economic development and regeneration 	The support for the approach to economic development and the policy is welcomed.
EDCLP/147 Hoton Parish Council	 Does the list include the ex-AstraZeneca Charnwood R&D site? 	The ex-AstraZeneca site is now known as Charnwood Campus and forms part of the Loughborough and Leicester Science and Innovation Enterprise Zone and is already an identified employment site.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	 Support protection of existing employment sites and the introduction of new, local employment opportunities. Soar Valley villages were once more self-contained and have experienced housing and population growth out of balance with local jobs, creating a commuter corridor based on car travel with increasing congestion 	The support is welcomed and the importance of providing jobs in our Service Centres is recognised by the draft Local Plan.
EDCLP/163 Liz Hawkes Anstey Parish Council	 Strong economic growth is desirable to support the needs of Anstey and surrounding villages 	The draft Local Plan recognises the importance of providing jobs in our Service Centres and supporting the rural economy.
EDCLP/209 Amy Smith Pegasus obo	 Development at Riggets Green can provide some 5ha of employment land; the policy should include an allocation as part of the Riggets Green development proposals 	The Council acknowledges the submission of further information for the site "Land at Riggets Green".
Jelsons		This site is included in the SHELAA (Reference: PSH123) and has been

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EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	 Total quantum of land to be made available for employment uses should be expressed as a minimum, not a maximum 	assessed. This additional information will be used to inform further site assessment work and inform the next draft of the local plan. The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. On this basis the policy requires "up to 77.8 hectares" and is similar in approach to the adopted Core Strategy.
EDCLP/221 Nick Baker Lichfields on behalf of CEG	 Does not allocate any new sites for employment as sufficient land has already been allocated in the Core Strategy. Support in principle, but flexibility is needed to ensure that changing demand for different types of employment space, including different locations, can be responded to ES8 currently defined at Thorpebury appears based on the approved illustrative masterplan and is inflexible and a potential obstacle to delivery, Draft Policy LP12 and the Policies Map should be amended to show ES8 as provided within the overall Thorpebury SUE area to provide reasonable flexibility for the delivery of this employment land. 	The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. The Policies Map at this stage is indicative to provide some further detail to assist the consultation. It does not seek to provide a definitive masterplan for the SUE.
EDCLP/223 lan Long Boyer Planning on behalf of Rotherhill Developments Ltd	 Distribution of employment land should encompass a broader range of sites to provide security to the Borough's employment land supply. A significant proportion of the employment land is to be delivered at SUEs which can be susceptible to deliverability issues. This may restrict the ability to meet demand and achieve a strong and diverse economy Submit land to the south of Syston Road, Cossington to the SHELAA consultation to increase diversity of sites in the plan. The site is 5.41ha and has good access to the strategic road network and would function with the existing Charnwood Edge Business Park as part of the A46 Priority Growth Corridor Small warehousing units, achievable on the site, and located in the south of the Borough will strengthen the economic relationship between south Charnwood and the city There is market interest and development can commence in 24 months 	 The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. The Council acknowledges the submission of the site and supporting information. The site will be included in the SHELAA and assessed accordingly. The information provided will be used to inform the next draft of the local plan.
EDCLP/225 John Clarkson	 Science Park site by Snells Nook lane has some ancient woodlands and probable ancient hedgerows. Development 	The land west of Snell's Nook Lane is already allocated for expansion of the Science and Enterprise Park through the adopted Core Strategy and

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Leicestershire & Rutland Wildlife Trust	will result in isolation of these important woodlands and there should be no adverse effects with provisions made to ensure their appropriate management into the future. Connectivity to other nearby woodlands should be improved and included in the plans for this development	was informed by biodiversity, and ecological evidence. The allocation is to be carried forward and the masterplanning of the site will be required to consider ecology, the provision of biodiversity networks and their maintenance.
EDCLP/226 Eleanor Hood	 Transport and infrastructure are part of new developments; builders have been allowed to get away with not fulfilling the needs of communities which must not be allowed to happen 	Infrastructure provision is recognised as an important component of sustainable development and we are in on-going dialogue with infrastructure providers to identify the community's needs. Developers will be required to provide that necessary to make development acceptable through binding legal agreements.
EDCLP/259 Severn Trent Water Property Development	 Request allocation of 10.3ha site adjacent to Severn Trent Water Works, Bottleacre Lane, Loughborough for employment. Site adjoins existing employment uses and is no longer required Challenge changes to settlement boundary and exclusion of treatment works and electricity hub, the adjacent railway line is the obvious physical feature for delineation. Reinstatement of the boundary would allow development in principle to contribute to Borough's future economic needs Site would promote regeneration of Loughborough East Priority Neighbourhood providing employment opportunities 	The Council acknowledges the submission of the site and supporting information. The site will be included in the SHELAA and assessed accordingly. The information provided will be used to inform the next draft of the local plan. The settlement boundary was determined through robust assessment in accordance with a set of key criteria employed to ensure consistency throughout the Borough.
EDCLP/231 CBC Neighbourhoods and Community Well Being	 Encourage reference to Public Spaces and improved landscape/environs as a driver of Economic Growth by providing attractive places to work, live and enjoy, as they contribute to the quality, attractiveness and competitiveness of the built environment References Sport & Physical activity as a significant area of economy. Should be guiding principle to incorporate this throughout any development 	The Local Plan should be read as a whole, policies in other sections which promote attractive, safe and well-managed public spaces and sport and physical activity are still relevant. Consideration will be given to emphasising these benefits in the employment and regeneration section.
EDCLP/192 Severn Trent Water	 Sites proposed for economic growth have been assessed as part of Level 1 Sewer capacity assessment and high-risk sites are summarised in relevant section. Further detail supplied within attached document. Please provide further information regarding certainty of development at Loughborough Science and Enterprise Park and likely timescales to enable capacity improvements requirements to be reviewed and implemented if required 	The current plan is a draft plan containing preferred options for site allocation, more certainty will be provided at in the pre-submission version. We will continue to engage with Severn Trent as the plan progresses
EDCLP/253 Ann Irving	 Question statistics, are so many new jobs needed, is the local population rising to this extent, is there evidence of shortfall. Jobs may lead to more inward commuters 	The amount of jobs and the growth in the population are based upon robust statistics, including the ONS, and evidence produced in support of the Local Plan, such as HEDNA and the Employment Land Study.
EDCLP/239	Policy supported	The support is noted and welcomed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Vivienne Barratt- Peacock		
EDCLP/211 Cllr Margaret Smidowicz	 The Vision for Charnwood in relation to the economy and Science Park is supported based on high technology and the knowledge-based industry The Science Park as a Business-Retail Park is not supported and will undermine the town centre 	The Local Plan will continue to support the Science and Enterprise Park for high value, knowledge based, hi-tech businesses and seeks to encourage town centre regeneration.
EDCLP/193 Richard Webb	 Would like to see encouragement of green tech industry to stimulate growth and capitalise on a greener tech future 	The text in the Employment and Regeneration chapter recognises energy and low carbon technology is an important contributor to the Science Park.
DCLP 265 Silver Fox obo Ms J & Ms A Kimber	 Quantum should be a minimum, not maximum. 	The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. On this basis the policy requires "up to 77.8 hectares" and is similar in approach to the adopted Core Strategy.
EDCLP/149 Andrew Thomas Thomas Taylor Planning Ltd obo Charnwood Accountants	 Economic needs are to be met by 8 large employment sites and the Science and Enterprise Park. No assessment appears to have been carried out to determine employment needs of specific communities or rural areas Draft Policy LP12 seeks to meet employment needs by providing opportunities for small-scale business units and offices and by encouraging live/work units Council wants to encourage a flexible supply of land to respond to a changing market and maximise economic growth However, the overall approach to confining development to land within settlement limits undermines flexibility to support employment and industry in the countryside. Development of live-work units would reduce need to travel and meet aims of sustainable development Overall priority to development of sites in the urban area is noted; however, new homes and employment opportunities in the countryside are necessary to sustain healthy rural economies and communities Conversion and re-use of existing buildings and previously developed land for employment outside urban and town centres Policy LP12 should be amended to support planning permission for rural economic development and live/work units outside settlement limits. Bullet points could be adapted to set a criteria-based framework to clarify when 	The draft Local Plan does seek to support the rural economy through Draft Policy LP16. However, the plan also seeks to support sustainable development and reduce vehicle movements which could result from encouraging businesses in our more rural areas. The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. We will consider whether the level of support provided to the rural economy meets the Council's vision for the Borough in the future.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	such development could be considered acceptable and should be cross-referenced to Draft Policy LP1as a specific exception	
EDCLP/150 Andrew Thomas Thomas Taylor Planning Ltd obo Mr S Scottorn	 Economic needs are to be met by 8 large employment sites and the Science and Enterprise Park. No assessment appears to have been carried out to determine employment needs of specific communities or rural areas Draft Policy LP12 seeks to meet employment needs by providing opportunities for small-scale business units and offices and by encouraging live/work units Council wants to encourage a flexible supply of land to respond to a changing market and maximise economic growth However, the overall approach to confining development to land within settlement limits undermines flexibility to support employment and industry in the countryside. Development of live-work units would reduce need to travel and meet aims of sustainable development Overall priority to development of sites in the urban area is noted; however, new homes and employment opportunities in the countryside are necessary to sustain healthy rural economies and communities Conversion and re-use of existing buildings and previously developed land for employment outside urban and town centres Policy LP12 should be amended to support planning permission for rural economic development and live/work units outside settlement limits. Bullet points could be adapted to set a criteria-based framework to clarify when such development could be considered acceptable and should be cross-referenced to Draft Policy LP1as a specific exception 	The draft Local Plan does seek to support the rural economy through Draft Policy LP16. However, the plan also seeks to support sustainable development and reduce vehicle movements which could result from encouraging businesses in our more rural areas. The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. We will consider whether the level of support provided to the rural economy meets the Council's vision for the Borough in the future.
EDCLP/252 Leicestershire County Council	 Importance of the service sector referred to in the plan but there is little reference to Loughborough University and Loughborough College, inclusion of employment figures would illustrate the contribution 	There is a reference to the importance of these institutions to the local economy in the supporting text on purpose built student accommodation. We will consider adding some supporting text to the economy section.
EDCLP/252 Leicestershire County Council	 Welcome support for superfast broadband networks; the Borough Council should consider creating incentives for investment in digital infrastructure including fixed full fibre and mobile infrastructure. For example, policies could 	The Borough Council is keen to support superfast broadband networks and does through Draft Policies LP12 and LP16

Isolout of 5G; ensure all new development g space for fibre; and support use of rooftops sure to accommodate infrastructureoment and expansion and of the University Science and Enterprise Park 12 constrains ability to bring forward oloyment sites, eg. 2.5ha site at BarrowSupport for the Science Park is welcomed. The Draft Policy does not seek to provide additional land, the Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. We will consider whether the level of support provided to the rural economy meets the Council's vision for the Borough in the future.
let to Draft Policy could be strengthened to g major employment opportunities in they reduce journeys to work by car
Ilocated employment land or for reuse of ment land would need to be subject to isport assessments. Draft Policy LP33 requires all major developments to have robust transport assessments and travel plans and to consider sustainable travel options at the outset so that they form an integral part of the development.
 knowledge of the market for commercial, distribution development in Leicester and Undertaken significant employment Loughborough area and bringing forward ithin the M1 corridor, most recently Optimus
Ived in Science Park but continue holding t J23, M1 which meet evidence base advice ment land available at, or close to J23 an proposes a 'hybrid' approach to growth ban concentration and intensification to meet
The 2018 ELR made the statement in the context of the fact that HEDNA ver, the analysis is flawed for employment significant, unjustified caution in identifying ment land to meet the area's needs ent Land Review (ELR); earlier stages of ack of supply of good quality employment market evidence and HEDNA all suggest nent land needs to be identified ec Sum) states "a minimum of 10ha of new to state state and to state state state and to meet the area's needs to be identified to the text state state and needs to be identified to the text state state and needs to be identified to the text state state and needs to be identified to the text state state and needs to be identified to the text state state and needs to be identified to the text state state and text states and text states and text text states and text text text text text text text tex
 ithin the M1 corridor, most recently Optimus lved in Science Park but continue holding t J23, M1 which meet evidence base advice ment land available at, or close to J23 an proposes a 'hybrid' approach to growth ban concentration and intensification to meet rowth needs for housing and employment up ver, the analysis is flawed for employment significant, unjustified caution in identifying ment land to meet the area's needs ent Land Review (ELR); earlier stages of ack of supply of good quality employment market evidence and HEDNA all suggest needs. The comments made in this representation w newly submitted sites and additional information and information in the needs of business are met, are economy is supported. The 2018 ELR made the statement in the corrwas silent on how much new land Charnwood should provide for Strategic Industrial (Warehousing) Land (units over 9,000 sqm). considered that the ELR should form a view. Borough Council, along with the other Leicest authorities, are currently undertaking a study warehousing requirements across the FEMA.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 continues "To meet this need we suggest that consideration could be given to allocating a site with very good accessibility to the strategic road network, ideally the M1, in order to meet this demand. None of the sites in the table appear to have this excellent level of strategic road access. The larger employment allocations in the SUEs were originally justified to meet local needs and provide balanced communities; not meet strategic employment needs of this type. So, this would suggest looking for a new site" The ELR acknowledges a qualitative deficiency in the provision of existing industrial employment land/premises and confirms the industrial market in the Borough is not operating efficiently due to the limited vacancy levels and lack of supply which will constrain growth and potentially lead to businesses relocating. In light of the evidence, it is not a credible strategy to suggest no further allocations are required up to 2036. There is a compelling case to allocate a further employment site, minimum size of 10ha. with excellent road access to the M1; capable of accommodating larger scale units; and able to serve Loughbrough and Shepshed. Evidence indicates that this is a pressing and urgent requirement due to the timescales of the SUEs and EZ site. Draft Plan supports and encourages new employment sites and economic growth but does not allocate a single new site. It relies on 35ha of employment land coming forward as part of three existing SUEs with a further 16ha from existing small scale employment sites. The strategic relies on timely delivery of SUE sites and windfall and small scale employment permissions. This isn't a clear and positive strategy to support sustainable growth and doesn't amount to the Plan 'proactively' seeking to meet development needs of business. Plan accepts wider need for strategic distribution units in Leicestershire across the FEMA. ELR expressly covers this need and recommends the Council investigate and meet such needs by relea	In terms of employment land, the SUEs account for 44ha of supply with a further 12.34ha at the Watermead Business Park and 21.54ha across a further four sites. Along with the 77ha expansion to the Science and Enterprise Park.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 approximately 16ha east of M1 and south of A512 [Site Plan & 2 potential layouts provided]. Site accessed from A512 via new roundabout with access rights reserved across allocated Science Park. Provides access at J23 M1, fulfilling criteria identified in ELR. Land northwest of J23 is identified for residential use and there are no other candidate sites which are suitable, available or capable of meeting the identified need Site can offer range of unit sizes to meet market demand, including larger unit sizes in excess of 9,000sqm referred to in land Review. No over-riding constraints exist; it is not subject to flood risk; ecological constraints can be managed; appropriate services can be delivered; landscape & heritage matters do not present major issues. Site is within the M1 'corridor', close to Shepshed and Loughborough, and the allocated science park site in sustainable location served by Loughborough/Shepshed bus corridor. Site is already influenced by urban features, is well contained in wider landscape without adverse visual impacts. Can provide a realistic complementary offer to Science Park to maintain a healthy industrial stock of benefit to the higher-end science park users through "spin-off" firms, so generating added industrial value. 	
Science and Enter	+	
DCLP-425-470 Environment Agency	 Loughborough Science and Enterprise Park includes the Flood Zones 2 & 3a and requires flood risk assessment and potentially exception test 	The site was previously allocated at through the Charnwood Core Strategy when flooding issues were considered. Detailed masterplanning work and planning applications will allow further assessment of flood risk.
	th of Birstall Sustainable Urban Extension	
DCLP 266 Leicester City Council	City Council notes that the policy reference in the site description should be to Policy LP36 and not LP35	The reference will be amended accordingly.
ES2 - Land at The	Warren, East Goscote	
DCLP-425-470 Environment Agency	 Site includes Flood Zone 2 and requires flood risk assessment Requires easement of 8m from Main River and will require flood risk permit 	The site was previously allocated through the 2004 Charnwood Local Plan when flooding issues were considered. Detailed planning applications will allow further assessment of flood risk and the main river easement.
	st of Loughborough Sustainable Urban Extension	
DCLP-425-470 Environment	 Site within Flood Zone 1 but may be issues from minor watercourse parallel to Hathern Rd 	The site was previously allocated through the Charnwood Core Strategy and has outline planning consent when flooding issues were considered.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Agency	 Site sits at boundary of two fluvial models, which do not include the culvert beneath the M1. Recommended the minor watercourse is modelled prior to development of site 	Detailed masterplanning work and planning applications will allow further assessment of flood risk.
EDCLP/192 Severn Trent Water	 Severn Trent is aware of the proposed development which will surround Shepshed WwTW and the impact is being reviewed 	The site was previously allocated at through the Charnwood Core Strategy and has outline planning consent. Detailed masterplanning work and planning applications will allow further assessment of potential impact.
ES4 - Land at Dish	nley Grange, Loughborough	
DCLP-425-470 Environment Agency	• Site includes the Flood Zones 2, 3a & 3b and requires flood risk assessment and potentially exception test along with floodplain compensation provided for any loss of floodplain storage in flood zone 3b.	The site was previously allocated at through the 2004 Charnwood Local Plan when flooding issues were considered. Detailed planning applications will allow further assessment of flood risk and floodplain compensation. A current application addressing compensation is under determination.
ES6 - Land at Lou	ghborough Road, Rothley	
DCLP-425-470 Environment Agency	 Site within 250m of the boundary of an Authorised Landfill permitted by the Environment Agency Site underlain by a historic (closed) landfill and sensitive from the perspective of controlled waters; any redevelopment must ensure there is no pollution risk to the water environment Permit from Environment Agency for the deposit of waste with potential for dust, amenity issues & mud on highways 	The site was previously allocated at through the 2004 Charnwood Local Plan when contamination issues were considered. Detailed masterplanning work and planning applications will allow further assessment of potential impact.
ES7 - L and at Wat	ermead Business Park, Syston	
DCLP-425-470 Environment Agency	 Site includes the Flood Zones 2, 3a & 3b and requires flood risk assessment and potentially exception test along with floodplain compensation provided for any loss of floodplain storage in flood zone 3b. Canal within or immediately adjacent to the site and Canals and Rivers Trust should be consulted; any proposed alterations to the canal or discharges must be agreed with the Canals and Rivers Trust 	The site was allocated through the Charnwood Core Strategy and when flooding issues were considered. Detailed masterplanning work and planning applications will allow further assessment of flood risk and consultation with the Canals and Rivers Trust.
DCLP 266 Leicester City Council	 City Council notes that the policy reference in the site description should be to Policy LP37 and not LP36 	The reference will be amended accordingly.
	of Leicester Sustainable Urban Extension	
DCLP-425-470 Environment Agency	 Site includes Flood Zone 2 and requires flood risk assessment 	The site was previously allocated through the Charnwood Core Strategy and has outline planning consent when flooding issues were considered. Detailed masterplanning work and planning applications will allow further assessment of flood risk.
EDCLP/192 Severn Trent	 Severn Trent is aware of the proposed development; however recent information indicates that the scale of 	The site was previously allocated at through the Charnwood Core Strategy and has outline planning consent. Detailed masterplanning work

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Water	development for phase 1 has changed and the impact of the revised changes is currently being reviewed	and planning applications will allow further assessment of potential impact.
Do you have any If you don't agree	ecting Existing Employment Sites comments on this draft policy? with the proposed policy please set out why and what alternative have missed something?	
DCLP/117 Mr Dennis Marchant	Policy is supported	The support is welcomed.
DCLP/155 Mr David Campbell-Kelly	 Early release of vacant, used or old sites for housing to reduce pressure elsewhere Realistic and due regard for commercial viability should be made 	Charnwood's stock of employment sites is well occupied and in market demand. To ensure that business need is met and the economy is supported the Local Plan seeks to protect employment sites. However, we recognise that some sites may better function in other uses and the Local Plan makes provision for such circumstances. To ensure that such sites are genuinely better put to other uses certain criteria are imposed, including commercial viability.
LDCLP/02 Anonymous	Business and retail uses should remain soMore development should be encouraged	The Local Plan seeks to protect business and retail uses where these are the best uses under specific circumstances. The Local Plan looks to encourage economic growth in the Borough.
LDCLP/34 Anonymous	 Employment sites will prosper with a systematic improvement to ease access and lessen congestion 	The Local Plan recognises the important role transport plays and aims to reduce congestion and improve efficiency of the road network.
LDCLP/51 Anonymous	• There are enough existing employment sites at present, but they are not utilised to full potential, a lot are under used, not suitable or run-down regeneration is needed	The Local Plan aims to support the economic needs of Charnwood which includes providing sufficient employment sites to ensure choice and flexibility can meet business needs. The Local Plan seeks to protect our existing good quality employment sites and encourage the regeneration of under-used or run-down sites. Sites which are no longer considered suitable may be developed for other uses.
EDCLP/74 Mr Hussain	 Vacant sites need to encourage entrepreneurship through funding, incentives are needed to encourage development and provide commercial premises for employment SMEs should be helped to develop in order to make better use of dormant commercial buildings Investment in making areas attractive is better than demolition Charnwood Borough Council should promote Charnwood for all businesses do Need a better approach to provide a meaningful life for people and develop care for each other and create better prospects for and community cohesion 	The Local Plan is a land-use plan and whilst investment can be supported it is not the primary tool for investment proposals. The promotion of the Borough and its community are similarly supported but the Local Plan is not the primary means of doing so.
EDCLP/100 Marrons on	 Employment evidence identifies a need for 55.9ha of employment land over the plan period, with a 10ha 	The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need to ensure land supply

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
behalf of Hawker Business Park Limited	 contingency. The Draft Plan proposes 154.88ha of employment land comprising 77.88ha of allocated land from the Core Strategy and 77ha extension to the Science and Enterprise Park. This provides sufficient land, choice and flexibility in to meet evidenced need and means there is sufficient supply with no need for new land to be found Draft Policy LP1 sets out the hierarchy of settlements, with Burton on the Wolds one of fourteen Other Settlements to accommodate 794 homes. No allocations are proposed at Burton on the Wolds and only 7 homes are expected to come forward within 5 years Despite exceeding the need for employment land, Draft Policy LP13 seeks to safeguard good quality employment sites requiring any proposal to demonstrate that there are no reasonable prospects that the site will be required for employment use in the future Two sites close to Burton on the Wolds are proposed for safeguarding including site 10377 Hawker Business Park, Melton Road, Burton on the Wolds. Employment Land Review (ELR) recommends it is safeguarded Draft Local Plan makes no housing allocations at Burton on the Wolds but safeguards approx. 12.5ha of employment land near Burton on the Wolds; c.8.5ha at Wymeswold Airfield and c.3ha at the Hawker Business Park which presents an imbalance and does not provide a strategy which positively and proactively encourages sustainable economic growth Hawker Business Park under the ELR under the 8 criteria scores 5 'poor', 2 'reasonable' scores and 1 'good' and should not be identified as a good quality employment site, scoring should result in a poor score overall. Only 'good' score was for market signals and not aware that site owner's view was sought on the market or site specifically. Market signals were at best 'reasonable' in 2017 and have worsened to 2019 to 'poor'. Mather Jamie, provide a synopsis of the market perspective with submission. Wish to secure best future return on the site; buildings require serious investment a	meets the needs of our businesses. However, existing employment sites are vital to ensure suitable accommodation is available throughout the Borough and the Local Plan aims to protect existing employment sites. The Hawker Business Park has been assessed to be safeguarded on the basis of the evidence contained in the Employment Land Review. This will be re-assessed on the basis of the information provided; however, other uses are unlikely to be in accordance with Draft Policy LP1 given the rural location. The site is in the countryside and is a location which is considered poor for residential development. There are no services or facilities which are easily accessible, other than by private motor vehicle, and as such is not considered a sustainable location. The potential for the conversion of the premises to flats, under the GDPO would be a matter for the site owner to pursue.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 issues associated with asbestos and other contaminants Could be redeveloped for c.100 homes without impacting on aim for 945 homes at Other Settlements or affecting the pattern of homes. This would make use of a brownfield site which will become derelict, provide homes to meet local need and provide a more balanced strategy for homes and jobs. Potential to convert the premises to 86 flats under GDPO and is available as a 'fall back' position but would be more appropriate to re-develop the site for housing through a well-designed scheme which responds to characteristics of the locality and the site. Request the removal of the safeguarding policy from the Hawker Business Park and suggest it is identified as a housing allocation under Policy LP3. 	
EDCLP/121 Marie Birkinshaw	 Frequent and convenient public transport to and from these sites is vital 	Many of the existing employment sites are well served by public transport; but others support our rural communities and public transport is less readily available. The Local Plan seeks to improve sustainable transport in Charnwood through Draft policy LP33.
EDCLP/125 Tim Birkinshaw	 CBC should be wary of developers holding out for the six months to use employment land for housing. The wait time should be at least two years and should include land being offered at significant discount to allow for new uses and to help counter speculative gain Nothing about sustainability or moving to a 'circular economy', completely contrary to later sections in Draft Plan 	The Local Plan should not put an undue financial burden on owners of employment sites and a two-year period is considered overly rigorous. The Local Plan should be read as a whole, policies in other sections such as encouraging sustainable construction and transport are still relevant.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 In broad agreement with the policy, but suggest that the marketing period for a redundant site should be extended to two years 	The Local Plan should not put an undue financial burden on owners of employment sites and a two-year period is considered overly rigorous.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	 Support protection of existing employment sites and the introduction of new, local employment opportunities. Soar Valley villages were once more self-contained and have experienced housing and population growth out of balance with local jobs, creating a commuter corridor based on car travel with increasing congestion 	The support is welcomed and the importance of providing jobs in our Service Centres is recognised by the draft Local Plan.
EDCLP/163 Liz Hawkes Anstey Parish	 Generally supportive of the proposals to protect existing employment sites. 	The support is welcomed

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Council EDCLP/167 Gareth Barton Turley obo ALDI Stores Ltd	 Draft Policy LP13 is unduly restrictive, setting criteria that are difficult to meet as they are too subjective. Eg. No time period is given for a new use; no geographical guidance is given for alternative accommodation to meet need Policy requires each criterion to be met, rendering it almost impossible for a non B class use development to comply Employment Land Review is flawed; HEDNA forecasts a future surplus in industrial land relative to demand. ELR takes a different approach using current information of take up and floorspace vacancy to conclude an additional 10ha will be necessary. This influences the ELR recommendation for controls over the release of employment land. There is no detailed analysis whether the current take up and 'tight' supply are anomalous circumstances, or part of a trend which is likely to continue. There appears to be no detailed justification for the 10ha additional requirement figure recommended in the ELR. ELR site assessment considers site 10420 Melton Road, Syston to be reasonable. This should be re-assigned as "poor" quality, due to its location adjacent to housing and the unrestricted nature of the operations permitted. The poor quality of existing buildings for employment use is also recognised. It should be identified as suitable for release from employment, particularly as it adjoins Syston District Centre, where expansion for (employment creating) town centre uses, or housing, are realistic alternative options. Draft Policy LP13 should provide more flexibility for release of employment land due to changing economic circumstances. Threshold for compliance should be a meeting at least one of the criteria achieved through the insertion of "or" after each of the criterion. 	The requirement for "no reasonable prospect" should be evidenced on a site by site basis as this will vary depending on a number of factors such as location, existing use etc. Similarly, geographical guidance would again vary on a site by site basis. The policy does not refer to B use classes but simply employment uses which allows for some flexibility on a case by case basis. There is a difference between need and demand. Need represents the basic requirements where there is a shortfall of adequate accommodation. Demand is about where a business wants to locate depending on area and ability to pay. This is an important distinction when considering supply targets and land release as we must consider both need and demand. The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need to ensure land supply meets the needs of our businesses. However, existing employment sites are vital to ensure suitable accommodation is available throughout the Borough and the Local Plan aims to protect existing employment sites. The ELR is considered to provide a robust assessment of existing employment sites.
EDCLP/222 Julian Sutton JMS Planning & Development on behalf of The Brush Group		The policy does not refer to B use classes but simply employment uses which allows for some flexibility on a case by case basis to accommodate sui generis and ancillary uses.The policy gives flexibility to provide for mixed use development on existing employment sites and this would be applied on a case by case basis.

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EDCLP/225 John Clarkson Leicestershire &	 13 is requested. Flexibility should also allow appropriate supporting infrastructure to the employment area such as, sandwich bars, car parking areas, day nurseries etc, which help to underpin the main employment function of a site, allowing the relevant employment area to flourish and be attractive through the provision of on-site supporting facilities. Southern elements of the site, near Loughborough Railway Station in particular, may have redevelopment potential due to its proximity to Loughborough Station transport node. The southern part of the site could be considered suitable for 'employment/mixed-use development'. We would be grateful if the site allocation could be amended to reflect this. Brownfield sites can have a high value for biodiversity and appropriate surveys should be carried out to establish the value of the land for biodiversity and the mitigation hierarchy 	The Local Plan should be read as a whole, policies in other sections are still relevant. Draft Policy LP22 seeks to ensure that biodiversity and ecological networks are protected and enhanced.
Rutland Wildlife Trust	 applied prior to submission of a planning application. Include additional textproposals will be supported where it can be demonstrated that: Sites are chosen where there will be a net gain for biodiversity Sites are chosen where provisions can be made that contribute to a nature recovery network 	
EDCLP/226 Eleanor Hood	No Comment	
EDCLP/239 Vivienne Barratt- Peacock	 Policy supported. Sites which cannot be kept in economic use should be converted to housing 	The support is welcomed. Draft Policy LP13 provides for the redevelopment of sites no longer required for other uses.
Q19 - LP14 - Rege	neration of Loughborough	
-	comments on this draft policy? with the proposed policy please set out why and what alternative	approach would you suggest?
	with the proposed poincy please set out wity and what alternative pave missed something?	
DCLP/116 Mr Dennis Marchant	The policy is supported.	The support of the policy is welcomed.
DCLP/134 Mr Martin Peters	Good to see a stronger reference to the visitor economy and a first reference for the tourism blueprint	The Draft Local Plan recognises the importance of tourism to our economy.
DCLP/156 Mr David Campbell-Kelly	All brownfield opportunities should be actively encouraged for housing development	The Draft Local Plan seeks to make efficient use of land, including using brownfield or underused land and buildings;

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DCLP/244 County Councillor Max Hunt	Public access and a visitor centre for Garendon Park could have 'clear benefits' to the Priority Area of Loughborough West, benefits beyond rights of way have yet to be confirmed restricting wider access and no Estate Plan. Trust is an important component of urban planning and can be severely eroded if aspirations are not met by actions.	The policies from the Core Strategy regarding the West of Loughborough SUE are to be carried forward. This includes the provision of access to Garendon Park.
DCLP/320 Mr Phil Sheppard	 The Regeneration Strategy is really good. When policies set targets "by" a certain year, interim actions and targets are often overlooked. To achieve the regeneration described "by 2036", has the Council set some interim actions and targets? Eg. what progress will have been made in the various locations by 2022? A lot of development in the last few years of the Plan to achieve 2036 aims is undesirable. As well as office workspace, many jobs relevant to the folk who live in Loughborough East are practical, so workshop space and high skill development, in conjunction with Loughborough College, could be specifically encouraged. Regeneration planning should apply to every asset in the Borough, at some point they all have to be refreshed. This is critical, at some point development has to stop being about building houses, structures and roads on previously undeveloped land and instead be about increasing productivity and skills on land already developed. 	 The Draft Local Plan provides support to the sites and improvements identified; however, it will be other strategies such as the Loughborough Town Deal and the Loughborough Town Centre Masterplan which will drive these projects. The Draft Local Plan does support the provision of small scale, high quality business units which support Priority Neighbourhoods. The Local Plan is a land-use plan and whilst improving training and skills can be supported it is not the primary tool for investment proposals. The Draft Local Plan seeks to meet the Borough's identified needs for housing and employment to 2036. To achieve this without development on undeveloped land would require significant changes at a national level.
DCLP/360 Mr John Barton	 Give developers the freedom to demolish and start again with energy efficient, purpose build new buildings. We are strangled by too much old stuff in this country. 	The Draft Local Plan does give the opportunity for redevelopment of existing sites and Draft Policy LP30 supports sustainable construction. However, our historic buildings and industrial heritage are irreplaceable resources which give character and a sense of place. We will seek to conserve and enhance our heritage assets and wider historic environment.
LDCLP/02 Anonymous	 Many people using Loughborough markets and events aren't from the area. More parking is needed. 	The provision of car parking has been thoroughly examined by the Borough Council and at present there is no intent for a publicly funded car park to be proposed.
LDCLP/15 Anonymous	 Definitely need more regeneration around Nottingham Road as one of the main entrances to Loughborough – eastern gateway – it's shockingly underdeveloped and poorly maintained. 	The Draft Local Plan recognises that improvements along Nottingham Road should be encouraged to improve this route into Loughborough.
LDCLP/34 Anonymous	 Regeneration could mean sustaining what already exists and improving matters to ensure a better existence. If so, we look to more tree planting, and the spread of flowers in grass wedges to please the eye. 	The Draft Local Plan promotes redevelopment by conserving and improving existing assets where possible. Tree planting and the conservation and enhancement of the natural environment are also supported.
LDCLP/51	More encouragement	The Draft Local Plan seeks to support and encourage regeneration.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
Anonymous		
EDCLP/24 Lisa Ambler	 Feel very strongly that we should be protecting the beautiful areas of our town and ensuring that future generations feel about Loughborough the same way I do. The town is surrounded by the most beautiful countryside and we should all be aiming to protect and cherish that. It makes our town appealing as you approach it and helps us stand out as a countryside worth exploring. Feel very strongly that we should be supporting the town centre and not looking to expand shops and restaurants outside that will draw people away from our market centre. 	The importance of our historic and natural environment is recognised and Draft Policy LP24 seeks to conserve and enhance our heritage assets and wider historic environment. Draft Policy LP19 seeks to protect the countryside's intrinsic character and beauty. The Draft Local Plan aims to ensure the vitality of Loughborough town centre through Draft Policy LP17.
EDCLP/34 Cllr Mary Draycott	 Welcome the inclusion of Nottingham Road being recognised as a Gateway in and out of Loughborough from the railway station. Thousands of people use the area and it needs to be the same standard as Epinal Way to the extent of hanging baskets, more litter bins and the buildings improved. 	The Draft Local Plan recognises that improvements along Nottingham Road should be encouraged to improve this route into Loughborough.
EDCLP/74 Mr Hussain	 How has the statement that "our diverse economy has helped protect the town from the worst impacts of the economic downturn" been evaluated and where have these stats been derived from. What regeneration has been done to the east of the town centre and what more needs to be done and how far from completion is it. What propositions are put forward for adding to the Great Central Railways infrastructure and enhancing tourist appeal and at what cost. Can such a cost in terms of adding to its infrastructure and subsequent marketing, be prioritised above the needs of social housing and who makes the final decision on this. What mechanisms & resources shall the borough use to encourage the improvements along Nottingham Road and to what extent will such improvements be made and when do the borough envision this work to take effect? Regeneration of the Priority Neighbourhoods can never happen unless the borough stimulates the housing market with its current housing stock. The requirement for the people is the same, the delivery of it is not as the borough is currently planning, which is a total failure of its responsible objectives for the people along with the duty owed to protect the environment. 	 National statistics show that Charnwood has relatively high levels of employment compared to some areas of the country. A number of sites in the east of Loughborough have recently undergone regeneration such as the Eastern Gateway around the railway station and the former 3M building. The Great Central Railway operates as a private enterprise and funding decisions are a matter for them. The Draft Local Plan seeks to facilitate development proposals which will enhance the railway but is not responsible for decisions on investment. Work along Nottingham Road would be supported but there are no schemes currently in place for improvements. The Draft Local Plan supports regeneration in the Priority Neighbourhoods. However, widespread regeneration of the housing stock in such areas would require initiatives beyond the remit of a Local Plan. Improvements to the quality and attractiveness in neglected areas are supported by the Draft Local Plan but the design and implementation of such schemes themselves is not a function of the Plan.

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CONSULTEE	 Crime breeds in neglected areas, it is time to reverse criminal behaviour and see how it reacts in better areas. Unless the borough can create opportunities for improving behaviour this may not be given a fair chance. There is little incentive to address wider concerns of people living in deprived areas and it is taking too long for people forced to live in deplorable conditions. The borough seems to be informing people in deprived areas that they must wait until 2036 before they are given improvement to their lives, by which time the criminal mind will develop into criminal actions with the high potential for the avoidable creation of victims. The whole ethos is gone to pot! Better living conditions are not something that can wait. The younger generation require a response that addresses the broader social picture, they need work that pays them well which will only develop from the improvement of housing and skilled manufacturing that they can be trained in. Technology leads the way, why are we losing sight of this in terms of product manufacturing that will help the younger generations We have so much potential but the lack of will to intensify it & take risks is truly cowardly & appalling Priorities should not be in housing as this has already produced thousands of "unaffordable" properties. Manufacturing, wholesale & export should be placed as a higher local govt priority to ensure a smooth transition from criminal behaviour into skilled workers. Other business models can be introduced for the younger generation of deprived areas, for example; training to become a unique food supply chain for all local retail outlets, and larger stores whilst earning a decent living from their own entrepreneurial spirit and hard work. Government doesn't know how to do anything other than just meaningless talk that leads to socioeconomic loss. Bilateral international trade considerations to improve areas of Charnwood's productivity for younger generations to operate in an	The Local Plan is a land-use plan and whilst wider economic priorities can be supported it is not the primary tool for this. A new Economic Development Strategy was produced in 2018 with the "inCharnwood" initiative launched to encourage inward investment and business growth, including the promotion of international relations. Wider changes such as international trade would require input from national Government.

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	 youngsters who do have a genuine interest can learn to benefit not only themselves but Charnwood. We can create the youth of England engaging with the youth of places like Pakistan for mutually beneficial trade alliances in all types of commodities that bring value added benefits to the borough. Empty buildings in run down areas can be utilised for the greater good. Priorities seem to be jumbled that fail to consider the greater good of all things to do with the better prospects of Charnwood. 	
EDCLP/121 Marie Birkinshaw	 Promotion of a thriving local economy for food, goods and skills is important and will reduce distribution, storage and heavy transport and delivery costs. 	The Draft Local Plan seeks to support the local economy. The Local Plan is a land-use plan and whilst wider economic priorities can be supported it is not the primary tool for this. A new Economic Development Strategy was produced in 2018 with the "inCharnwood" initiative launched to encourage inward investment and business growth.
EDCLP/125 Tim Birkinshaw	Good, especially the 'active waterfront'.Better cycling and walking access.	Draft Policy LP21 provides further support for the active waterfront, including the promotion of walking and cycling links.
EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	 Promote opportunities to improve quality, quantity and accessibility of surrounding landscape for leisure and recreational uses. This would include examining additional housing sites around the Service Centres, particularly those that contribute to Loughborough and are regarded as part of its 'urban area' e.g. Sileby and Barrow-upon-Soar. 	The Draft Local Plan seeks to promote leisure and recreation in the countryside through a number of policies. The proposed housing sites currently allocated in the draft plan have been assessed as those that best meet the Council's objectives.
EDCLP/143 CPRE Leicestershire and Charnwood District Group	We are in broad agreement with this policy.	The support is welcomed.
EDCLP/164 Dr S.J.Bullman Storer & Ashby Area Residents Group (SARG)	 Draft policy LP14 cites LP 17, which DOES omit to exclude unwelcome proposals. 	The Draft Local Plan would seek to determine each development proposal on its own merit. Those which do not meet the relevant criteria are not supported; however, a blanket ban on certain types of development would be contrary to national policy which makes a presumption in favour of sustainable development.
EDCLP/165 Dr S.J.Bullman	 Draft policy LP14 cites LP 17, which DOES omit to exclude unwelcome proposals. See Q22c 	The Draft Local Plan would seek to determine each development proposal on its own merit. Those which do not meet the relevant criteria are not supported; however, a blanket ban on certain types of development would be contrary to national policy which makes a presumption in favour of sustainable development.
EDCLP/200 Ian Dickinson Canal & River Trust	 Pleased to note Policy LP14 acknowledges the heritage and tourism value of the Grand Union Canal and advocates active waterfronts with public access in new development proposals. To fully realise the potential of the canal as a 	Draft Policy LP21 provides further support for the active waterfront and its enhancement, including the promotion of access via walking and cycling links.

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	leisure and recreation resource, new development alongside the canal should engage with it rather than turn its back on it, and aims to encourage greater use of the canal and towpath by improving access and increasing activity, natural surveillance etc. to help create a more attractive environment for canal and towpath users.	
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	 Policy should promote opportunities to improve the quality, quantity and accessibility of surrounding landscape for leisure and recreational uses. 	The Draft Local Plan seeks to promote leisure and recreation in the countryside through a number of policies throughout the plan.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	 Should support proposals that result in a net gain for biodiversity and link up habitats, contributing to a nature recovery network. Development adjacent to the Grand Union Canal should result in a net gain for biodiversity and contribute to a nature recovery network as it is a corridor for wildlife. 	Draft Policy LP22 seeks to support and enhance the natural environment, including providing a net gain in biodiversity and enhancing networks such as that provided by the canal.
EDCLP/226 Eleanor Hood	No Comment	
EDCLP/231 CBC Neighbourhoods and Community Well Being	 Welcome and support the inclusion of the regeneration of Loughborough's Industrial Heritage Quarter and Allsop's Tip in Draft Policy LP 14. 	The support is noted.
EDCLP/192 Severn Trent Water	 Policy LP14 identifies the regeneration of Loughborough as a key aim for the draft local plan. Severn Trent would in principle be supportive; however, note that due to the age of Loughborough the drainage system consists of different types of sewers. Increasing pressures from climate change, urban creep and infill development are anticipated to impact on the performance of the sewerage system. Current best practice requires new development to be designed around separate foul and surface water systems. When redeveloping areas, the existing system may be a combined system. It is recommended that all opportunities to separate surface water on site and discharge in accordance with the drainage hierarchy are delivered. Therefore, recommend that a bullet point is added to Policy LP 14 to highlight at this early stage the need to consider sustainable surface water outfall before the existing outfalls are utilised. 	The importance of ensuring adequate drainage in urban areas is recognised and would be further assessed during the planning application process. Consideration will be given to adding the additional wording requested to the policy.

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	 Note that planning application advice regarding surface water drainage will be provided by the Lead Local Flood Authority and recommend they are consulted in the above comments and design principles before including within the local plan. 	
EDCLP/239 Jonathon Barratt- Peacock	 Loughborough could do with an East ring road to alleviate congestion on Epinal way and improve access to the north east which would help enable more development to take place here. 	An eastern ring road would require significant investment and development is unlikely to be able to afford to fund such infrastructure. As such this would require substantial public investment.
EDCLP/239 Vivienne Barratt- Peacock	 Loughborough is a really lovely town with shops/restaurants close together and is welcoming and friendly. Bowling alley would be a great addition to the town. Historic areas are beautiful and support their preservation. Loughborough could do with an East ring road to alleviate congestion on Epinal way and improve access to the north and the beautiful and support here are a durated by the preservation. 	The Draft Local Plan seeks to ensure the vitality of Loughborough is maintained. The historic environment is protected and its enhancement is supported. An eastern ring road would require significant investment and development is unlikely to be able to afford to fund such infrastructure.
EDCLP/211 Cllr Margaret Smidowicz	 east which would help enable more development to take place here. Agree that the Industrial Heritage Quarter and promoting mixed use development that retains and enhances the remaining heritage assets and investigating the potential for a heritage trail which links these elements is important. Nottingham Road area forms the direct route between the railway station and town centre and passes close to these heritage assets. In parts it is a neglected and improvements would enhance a key gateway area to Loughborough and link to the wider heritage trail. Borough should hold the owner to account where conditions on any application have not been complied with on materials and colour. Priority Neighbourhoods at Loughborough East and Loughborough West are clearly identifiable as having high levels of deprivation and mixed groupings. They suffer from over-crowding within the numerous non-student HMOs. There are vulnerable residents with low incomes, high unemployment, low attainment levels, poor health and high crime rates. CBC needs to know the owners of these properties and whether the Right to Rent Requirement is carried out effectively. The enhancement of canal-side entertainment and cafes has potential to be very attractive for example, the Centre of Birmingham now has a viable, attractive, well-lit area. 	As such this would require substantial public investment. The support is welcomed, and the Draft Local Plan encourages the potential for a heritage trail and conservation and enhancement of heritage assets. Improvements to the public realm along Nottingham Road are also encouraged. Compliance with planning conditions would be a matter for the enforcement team. The Right to Rent Requirement would not be a matter for the Draft Local Plan to pursue. Draft Policy LP21 provides support for creating an active waterfront and its enhancement

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DCLP 265 Silver Fox obo Ms J & Ms A Kimber	 Promote opportunities to improve quality, quantity and accessibility of surrounding landscape for leisure and recreational uses. This would include examining additional housing sites around the Service Centres, particularly those that contribute to Loughborough and are regarded as part of its 'urban area' e.g. Sileby and Barrow-upon-Soar. 	The Draft Local Plan seeks to promote leisure and recreation in the countryside through a number of policies. The proposed housing sites currently allocated in the draft plan have been assessed as those that best meet the Council's objectives.
EDCLP/252 Leicestershire County Council	 There are several good museums in Charnwood and it's a shame they are not referenced. There is no reference to Loughborough Library, the largest in the County. These cultural institutions play a significant role in supporting Draft Policy LP14 and the priorities around protecting and enhancing heritage assets and encouraging greater tourism at attractions such as the Great Central Railway; Carillion, Charnwood Museum and Stoneywell. 	The Draft Local Plan recognises the importance of tourism to the economy. Reference to the sites suggested will be considered.
Mr Gideon Cumming	• Agree with the policy to improve the infrastructure for the market, and to preserve heritage assets.	The support is welcomed.
Do you have any c	egeneration of Shepshed comments on this draft policy? with the proposed policy please set out why and what alternative	approach would you suggest?
DCLP/78	 Shepshed Town Centre Masterplan is not ambitious 	The Draft Local Plan recognises the difficulties for Shepshed which result
Mr Paul Unwin	 enough. Major changes need to be made to the infrastructure/road layouts to allow a 'whole town' circular bus route. The Bull Ring, Market Place, Hall Croft and Glenmore Park are separated from each other and unsuitable for public gatherings, out of view to people passing through. The town has no identity or reason for people to go there except to sleep. Getting in and out of the town is difficult due to the historic road layouts and on-street parking. The town is car dependent and remote. Over the last 25 years has become a suburb of Loughborough and a dormitory town for nearby cities yet feel cut off and have poor access to these areas. 	from poor connectivity and the historic road network. A new masterplan may be developed to investigate these issues and improve the town's vitality and viability. The Draft Local Plan seeks to promote sustainable development and reduce journeys by private motor vehicle. This will require a comprehensive effort across a number of areas including transport, regeneration and the economy.
DCLP/163 County Councillor Max Hunt	 Small town of Shepshed is required to add over 2,000 more dwellings with no further employment land yet the Plan is at a loss when it comes to how a viable town centre or how other aspects of the town might regenerate. There is no evidence that proposals in this section are viable or achievable. 	Shepshed is close to the proposed employment allocations at the Science Park and West of Loughborough SUE.An improvement to the vitality of Shepshed is recognised as extremely important and funding for public realm improvements is being accessed.
DCLP/202 Mr A Roberts	 Nothing concrete regarding actions that will be taken and what funding will be set aside for it. Shepshed has already 	Funding from S106 agreements has been received from housing developments in Shepshed to contribute towards infrastructure and

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	 seen substantial numbers of new houses being built with hardly any investment being made in infrastructure or services. The majority of investment always seems to go to Loughborough, and this seems to confirm it won't change. Adding 2,000 more houses will stretch Shepshed to breaking point unless some major infrastructure investment is made first. It is no good building all these houses, taking money from the developers and then investing it all in Loughborough. Don't build any more houses in Shepshed until the infrastructure has been put in place to support that 	facilities in relation to areas such as health, education and transport. An improvement to the vitality of Shepshed is recognised as extremely important and funding for public realm improvements is being accessed. The housing development proposed for Shepshed have been assessed as those that best meet the Council's objectives. Infrastructure provision is recognised as an important component of sustainable development and we are in on-going dialogue with providers to ensure the community's needs can be met.
LDCLP/02 Anonymous	 until the infrastructure has been put in place to support that. Not said that you will create new community facilities etc. Shepshed needs new road structures, community facilities, car parking space and a town centre. 	The housing development proposed for Shepshed have been assessed as those that best meet the Council's objectives. Infrastructure provision is recognised as an important component of sustainable development and we are in on-going dialogue with providers to ensure the community's needs can be met.
LDCLP/15 Anonymous	 Not sure how you can ensure new homes are well connected to Shepshed town centre at present. Can any of the town centre be pedestrian only? 	The Draft Local Plan recognises the difficulties for Shepshed which result from poor connectivity and the historic road network. A new masterplan may be developed to investigate these issues and improve the town's vitality and viability.
EDCLP/34 Cllr Mary Draycott	 Refers to Shepshed's town centre declining, closure of shops etc. The large number of properties which have been added to the town has been the main cause of this. The need to use the town centre has reduced as people go in and out of the town to work, shop and socialise. A new Masterplan will not help the damage has been done and even more housing is proposed. Shepshed will be increased so much to become part of Loughborough and lose its identity. All the current new build and proposed houses are not connected to the town centre. 	The Draft Local Plan recognises the difficulties for Shepshed which result from poor connectivity and the historic road network. A new masterplan may be developed to investigate these issues and improve the town's vitality and viability.
EDCLP/74 Mr Hussain	 How much is it going to cost the public for the feasibility study when there really is no requirement of any study if social housing is considered as a higher priority with the stock we already have. Sounds very promising and no doubt would become a thriving town once constructed; however, 2,000 new homes should not go ahead unless all 2,000 of them serve the greater public need. Greater consideration for the people of Shepshed who need adequate housing more than a shopping centre. Adequately house everybody first, then worry about opening a little town with some pretty little 	The feasibility study would seek to improve Shepshed for the whole community, both existing and future residents. Social housing is a priority but so are other aspects of ensuring that the Council's vision and objectives are achieved, and communities' needs are met.

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	shops.	
EDCLP/121 Marie Birkinshaw	 Agree with support for small businesses and training opportunities – don't simply see it as a transport support hub for elsewhere. 	The Draft Local Plan seeks to support the local economy and reduce journeys to work.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 We are in broad agreement with this policy. 	The support is welcomed.
EDCLP/176 Hannah Post Barton Willmore obo Michelmersh Brick Holdings Plc	 Support Draft Policy LP15 and its principles to regenerate Shepshed and consider that Client's Site, land south of Ashy Road Central, Shepshed, could assist in the regeneration of Shepshed in providing a high quality development, well connected to the centre of the settlement. 	The support is welcomed. Site selection was informed by evidence but will be reviewed in light of information received from this consultation.
EDCLP/224 Paul Newton	 Is it 20% of all residents or 20% of the working population that work within the town? Similarly, for the 27%? Access to the centre is not hindered by lack of links (roads/pavements) but by the spread out nature of the town and the distances involved (eg. Ashby Road to the centre). How would a new town centre in the west be of use to the proposed new housing development off Fairway Road? 2800+ new homes at Shepshed plus 3500 new homes at Garendon is not a regeneration strategy for Shepshed. What else is included in the strategy? More attractive rates for retailers / services (if necessary, focussing on small businesses) Strategy for more leisure, recreation and physical activity facilities and participation. Much more ambitious plan to switch from cars to cycling and public transport, including safe cycling infrastructure (as in the Netherlands) and green buses. This should include much improved routes between Shepshed and Loughborough (including but not limited to Garendon). This would do a lot to reduce road congestion, pollution and promote health. It is a reasonable aim considering the timescales of the plan (up to 2036). Current population of Shepshed, even more so with the proposed developments, deserves a large decent supermarket to eliminate trips to Loughborough or Coalville. 	The percentage figures refer to the economically active population. Poor connectivity and the historic road network cause accessibility issues which are detrimental to the town centre. Improvements to accessibility would make the town centre more attractive for visitors despite an increase in distance should it be relocated. Housing development can provide funding through S106 agreements and an increase in population would improve the vitality and viability of the town centre. The Shepshed Town Centre Masterplan and Delivery Framework identifies further proposals to regenerate Shepshed. Business rate relief would require changes at a national level. The Active Charnwood team delivers sport and physical activities throughout the borough, offering our residents a wide range of opportunities to get out, get active and improve their health. The Draft Policy LP33 seeks to improve sustainable travel across the Borough, reducing congestion on our roads and CO2 emissions. We are producing sustainable transport evidence which will look at how journeys by sustainable modes can be increased and are in regular liaison with the City and County Councils on how this can be achieved.

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EDCLP/226	 The existing multiple small stores do not offer a wide enough choice eg. currently not possible to purchase loose vegetables in Shepshed. No Comment 	
Eleanor Hood EDCLP/202 Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	 Entering a period of economic uncertainty and the Plan should ensure opportunities to support the local economy can be realised without allocation. Draft Policy LP15 does not present sufficient flexibility to approve speculative development in Shepshed, which go beyond the specified policy criteria, to achieve regeneration in the town. Development proposals that improve access to community facilities, particularly for future residents on the urban fringe, are constrained by the rigid approach of Draft Policy LP17, presenting a potential conflict where proposed community facilities are defined main town centre uses. Limited policy criteria of Draft Policy LP15 should be replaced with a more general statement of support for regenerative development, seeking to grant planning permission where sustainably located opportunity sites come forward which make a significant contribution to economic growth in Shepshed and are accessible to local people. 	Draft Policy LP15 provides support for sustainable development which contributes to the regeneration of Shepshed, including speculative development. However, we also need to ensure that the vitality of Shepshed town centre is supported. A more general statement of support could result in development with detrimental impacts upon Shepshed town centre and the urban fringe.
EDCLP/192 Severn Trent Water	 Policy LP15 identifies the regeneration of Shepshed as a key aim for the Draft Local Plan. Severn Trent would in principle be supportive of this approach but would raise the same comments regarding brownfield development / regeneration as we have regarding Loughborough. 	The importance of ensuring adequate drainage in urban areas is recognised and would be further assessed during the planning application process. Consideration will be given to adding the additional wording requested to the policy.
	neration of Shepshed	
Do you have any v DCLP/78	 views on how Improvements on Shepshed Town Centre can be ta Widen roads to create a town bus route. Would the car 	ken forward? These proposals could be investigated through a new masterplan and
Mr Paul Unwin	parking area in the Market Place (outside The Crown/Baron's) make a good bus hub?	feasibility study.
	 Open up public spaces to be visible and connected to each other. Reduce road parking on Leicester Rd & Charnwood Rd. Work with owners to improve the appearance of their buildings at the centre of town. Many are shabby. 	Funding is being sort for public realm improvements in Shepshed.
DCLP/163 County Councillor Max Hunt	 One of the problems the Plan is up against here is the lack of inward investment to make improvements. The commercial sector has not invested despite many plans put 	A new masterplan and feasibility study could investigate more radical solutions and how investment could be encouraged. Further funding is being accessed for public realm improvements which will provide

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	forward through the Borough Council. The Borough Council itself has made improvements to the public realm which are pleasing but have not delivered change.	additional improvements.
DCLP/202 Mr A Roberts	 More and better roads. More shopping areas with parking. Investment in health and education provision. Leisure facilities for adults and children. 	 Poor connectivity and the historic road network cause accessibility issues which are detrimental to the town centre. Improvements to accessibility would make the town centre more attractive for visitors. A new masterplan and feasibility study could investigate increase in retail space and parking. Funding from S106 agreements has been received from housing developments in Shepshed to contribute towards infrastructure and facilities in relation to areas such as health, education and transport.
LDCLP/02 Anonymous	Improve road structures and community facilities	Poor connectivity and the historic road network cause accessibility issues which are detrimental to the town centre. Improvements to accessibility would make the town centre more attractive for visitors.
EDCLP/52 Shepshed Town Council	 Two Masterplans have been prepared for Shepshed but have not been implemented to any extent. How will the new Local Plan rectify this? Core Strategy referred to 5ha of employment land for Shepshed, however, nothing for Shepshed is now mentioned. Shepshed businesses are being converted into residential which has a detrimental effect on Shepshed. 	The Draft Local Plan is a land use plan and can provide support for regeneration proposals and encourage development. However, implementation of proposals would need to be driven through other means. The provision of adequate land and premises for businesses to support the economy is an important aspect of sustainable development. Our employment evidence does not show that additional land is required; however, the comments are noted and will be considered further.
EDCLP/74 Mr Hussain	 Will worry once we start seeing some meaningful action for the people of Shepshed. Housing first and housing for life. 	The Draft Local Plan will meet the local housing need for Charnwood and will seek to a mix of house types, tenures and sizes to meet this need.
Do you have any c If you don't agree	Economic Development comments on this draft policy? with the proposed policy please set out why and what alternative ave missed something?	e approach would you suggest?
DCLP/5 Mr Robbie Kerr	 Exclusion of the Town Hall in this cultural narrative is worrying. It welcomes 80,000 paying and 20,000 non-paying visitors a year. It houses 12 local group shows per year, which entertained over 16,000 customers last year. The income generated to CBC is just under £1.5million, and boosts income in the town and car parks. Vital that tourism is part of the place-making strategy for Charnwood; the Town Hall plays an important part, in the same way the GCR, Museums, GUC do. The Town Hall needs to be included by name rather than a generic 	This section relates to the rural economy; however, the contribution of the Town Hall is recognised and recognition in the town centres and shopping section will be considered.

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	"cultural activity". Charnwood has a great tourism offer, and this needs to be celebrated and defined at every opportunity.	
DCLP/40 Ms Suzanne Collington	 People won't be able to come to work if they can't park and most village centres have inadequate car parking. Neighbourhood plans have solutions for this. 	The Draft Local Plan seeks to ensure that all new development, including employment, provides adequate car parking. Village centres are often constrained, and neighbourhood plans are a means for the local community to identify solutions and potential car park sites. The County Council also have an important role in on-street parking.
DCLP/112 Mr Dennis Marchant	The policy is supported.	The support is welcomed.
DCLP/136 Mr Martin Peters	 2018 STEAM tourism economic impact modelling data is now available. A demand study would allow for a proper allocation of growth across the whole borough. 	A study of the demand for visitor facilities would provide further information for the plan's evidence base; however, this may be somewhat beyond the remit of the Draft Local Plan and may be better undertaken by the Council's leisure and culture team.
LDCLP/02 Anonymous	 More broadband; broadband is everything, you can't do business without it 	The Draft Local Plan supports the provision of superfast broadband across the Borough.
LDCLP/15 Anonymous	 Good idea to support development but would the Council promote the businesses as a unified whole So residents would know where the different businesses are? Same with farm diversification. 	The Local Plan is a land-use plan and whilst development can be supported it is not the primary tool for promoting businesses. Support for business is provided by the Borough Council by the Regeneration and Economic Development Team through the inCharnwood brand.
LDCLP/34 Anonymous	 Critical if the environment is to be improved. Need a motto such as "from leaf to love". Tree planting must go beyond rapid growing silver birch, firs and cherries to slow growth. Substantial hardwoods – oak, beech, chestnut etc are more eventually more versatile and sought after than soft woods. Schemes and colleges should be encouraged to plant more trees and shrubs. Where land is subject to flooding willow plantations must prosper. Hedgerows can be used to sow acorns and chestnuts along with bluebells, primroses and cowslips. Developers should be encouraged. Also, rural crafts – fence and panel making – straw beehive constructions and much more. 	The importance of tree planting is recognised by the Draft Local Plan with specific support provided by Draft Policy LP23. Draft Policy LP16 provides support for rural businesses, including rural crafts.
LDCLP/51 Anonymous	 Not encouraging sustainable farming/environment protection food production/flood mitigation and biodiversity enough. We need the countryside to look after us. We are killing it regenerate what we already have and improve. 	The Draft Local Plan recognises the vital role played by the countryside and Charnwood's natural environment. Chapter 7 is focussed on these elements and contains a number of policies in this respect.
EDCLP/59 Anonymous	 Strongly support farm diversification where farming remains the dominant element of the business. Large stretches of farmland in Charnwood are disappearing for housing 	The Draft Local Plan supports farm diversification, tree planting, renewable energy and the protection of areas of separation. However, it must also meet the local housing need for the Borough and the sites

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	development including farmland between Loughborough and Quorn. The retention of farmland and support for farmers is crucial, including projects to promote farm diversification. Highlight tree planting and green/solar energy highlighted in Quorn/Woodthorpe on the Policies Map 2. Farm diversification and support for farmers is critical to implement the overall vision set out in the draft Local Plan, and to several Draft Policies. Eg. it is central to the survival of the Areas of Separation which give settlements - including Quorn - their distinctive character and identity, and also to the maintenance of biodiversity.	selected were informed by evidence and are those sites that best meet the Council's objectives.
EDCLP/74 Mr Hussain	 Re-use of rural buildings is a good idea GCR can wait a little while longer; the railway can make do with what is already there until money becomes available. Heritage is all very nice but there are much higher needs for the development of human beings as a consequence of high levels of inflicted poverty and rising levels of crime. What amenities are being considered for canal related tourism and how will this improve the lives of those having to visit foodbanks and or living with a housing crisis scenario. There is no amenity, there is only housing, once you have accomplished that, then worry about making a canal look pretty and meaningful for people to visit. Housing first. How about a nursery/infant school if there is not anything already for education, this can create local work 	The GCR is a private enterprise and allocation of funding would be a matter for themselves. The policy simply provides support for any future proposals. Similarly, support for future proposals for the canal is provided but no publicly funded schemes are currently proposed by the Borough Council. An education facility may be suitable, subject to meeting the relevant criteria.
EDCLP/121 Marie Birkinshaw	 Include detailed plans on biodiversity corridors across the whole Borough and links with nature organisations and nature-based landowners and actively promote species conservation and commitments. Investment in soil improvement across the Borough and agriculture for wildlife is definitely an area that should be considered. 	The Draft Local Plan provides support for biodiversity networks through Draft Policy LP22. Soil improvements and agriculture for wildlife are supported but are beyond the remit of a Local Plan.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group		The Draft Local Plan seeks to provide support for rural businesses.
EDCLP/200 Ian Dickinson Canal & River	 Policy supports leisure and tourism facilities that benefit the River Soar/Grand Union Canal. The Trust supports this approach to maximising the rural economy, which 	The support is welcomed and Draft Policy LP21 specifically identifies the importance of these waterways. However, development also needs to be balanced against the need to protect biodiversity and accessible by

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Trust	recognises that assets such as the river/canal are 'non- footloose', their location and alignment is fixed. To realise their potential, supporting development has to be located in proximity to them, even if this means rural and less sustainable locations are considered. This not only unlocks the potential of the waterway but also supports local economies in more rural areas.	sustainable transport modes.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	 Support rural economic development that provides for a Nature Recovery Network, climate change resilience and results in a net gain for biodiversity. Concerned that the Charnwood Forest is being considered purely as a forest, there is much more to this area. The geology of Charnwood Forest is of international importance and it contains a variety of wildlife habitats that are considered to be of national, regional and local importance. Semi-natural ancient woodland, pasture woodland, unimproved neutral grassland and marsh are the most valuable habitats. 	The importance of biodiversity and geodiversity are recognised by the Draft Local Plan, notably through Draft Policy LP22. However, amendments to reference geology and wildlife habitats in relation to the Charnwood Forest will be considered.
EDCLP/226 Eleanor Hood	No Comment	
EDCLP/203 Leicestershire and Rutland Bridleways Association	 Plan has overlooked the horse industry and the contribution it makes to the rural economy. Borough has a considerable horse-population: one local farrier acknowledged caring for the hooves of 1000 horses and the horse-count in one parish was around the 200 mark. One rider has just 'confessed' to buying £1700 of services/goods this year for care and maintenance of a 4-acre paddock, quite separate from feeding, farriery, vets etc, which – in 2015 – averaged £3,166 per horse according to LRBA's survey. Horse-keeping keeps spaces 'green' which are too small for economic farming. Applications for buildings to be used as a livery yard or for a training arena need to be supported, subject to relevant conditions. Horse tourism should be encouraged by providing off-road parking for horseboxes, B+B for riders and horses (a secure paddock is the basic need for the horses), and routes. LRBA has been working since the 1990s to develop the following, partly inter-locking, routes which use bridleways and quiet roads in the Borough: A. Ten Hills Circular Trail: Starting at Six Hills, it would link to the Beacon and Bradgate and across, probably via 	The horse industry is recognised as making a valuable contribution to the rural economy. Consideration will be given to providing specific recognition in the Draft Local Plan.

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	 Watermead, to High Leicestershire to include Tilton and other hills. B. Through Leicester from Blaby to Beaumont Leys where there is a bridleway to Thurcaston/Cropston and the Charnwood Forest. C. Round Leicester. Northern part would link Castle Hill Park in Beaumont Leys to Watermead. Discussing with Broadnook SUE and Ashton Green how this could be achieved. A more southerly link through Birstall is also desirable. D. Round Loughborough has a number of current major, but solvable, problems. Mainly the M1 and R.Soar crossings. E. The Mercian Way, a region-wide circular trail to link the Charnwood/National Forest with the High Peak, Sherwood Forest and Rutland. Main problem locally is finding a route westward from Beacon Hill due to lack of bridleways. Midshires Way is a long-established element in a series of trails that stretch from the south coast to the Scottish border. Its nearest points to Charnwood are Brooksby and Kegworth but loops off it could contribute to the eastern part of the Borough. Leicestershire Round walking route also goes through the Borough and might wish for better/safer connections between the PRoW it uses, e g the crossing of the A46 in Cossington parish. 	
EDCLP/192 Severn Trent Water	 Understand the need to support the economy in rural areas; however, the development of water intensive industries in rural areas, would be likely to require infrastructure improvements to accommodate water usage and sewerage needs. Early conversations with utility providers are encouraged to prevent delays where this type of industry is planned. 	The need for early discussion if such uses are proposed is recognised. The Draft Local Plan does not encourage such proposals.
EDCLP/239 Vivienne Barratt- Peacock	Policy supported.	The support is welcomed.
EDCLP/239 Vivienne Barratt- Peacock	• Transport links from Rearsby airfield are very good. The A46 (which leads directly to the M1) can be accessed in a couple of minutes via the newly built Rearsby bypass which is distant from any housing so disagree with the comment that the site is not suitable for large vehicle movements.	The site is not easily accessible by sustainable modes of transport so would encourage the use of private motor vehicles.
EDCLP/149	 Notwithstanding the support provided by Draft Policy LP16, 	The draft Local Plan does seek to support the rural economy through

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Andrew Thomas Thomas Taylor Planning Ltd obo Charnwood Accountants	 the overall approach to confining development to land within the Settlement Limits to Development implied in Draft Policy LP1 undermines the flexibility required to provide a support for employment and industry in the countryside and rural parts of the Borough or, in any location outside identified Limits to Development. There are advantages in the development of live-work units in rural areas which reduces the need to travel in accordance with the overall aims of sustainable development in the NPPF. Whilst priority is given to sites in urban centres to support the vitality and viability of the town centres, new homes as well as employment opportunities, including offices, leisure and tourism uses are also necessary to help sustain healthy rural economies and communities. Conversion and re-use of existing buildings and the redevelopment of previously developed land and buildings for employment uses in the countryside can provide a sustainable way of accommodating such development (economic, social and environmental) set out in the NPPF. These forms of development can also contribute to the mix of accommodation for small and medium sized businesses. Draft Policy LP16 should be amended to support planning permission for rural economic development and live/work units outside settlement limits. Bullet points could be adapted to set a criteria-based framework to clarify when such development could be considered acceptable and should be cross-referenced to Draft Policy LP1as a specific exception 	Draft Policy LP16. However, the plan also seeks to support sustainable development and reduce vehicle movements which could result from encouraging businesses in our more rural areas. The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. We will consider whether the level of support provided to the rural economy meets the Council's vision for the Borough in the future.
EDCLP/150 Andr ew Thomas Thomas Taylor Planning Ltd obo Mr S Scottorn	 Notwithstanding the support provided by Draft Policy LP16, the overall approach to confining development to land within the Settlement Limits to Development implied in Draft Policy LP1 undermines the flexibility required to provide a support for employment and industry in the countryside and rural parts of the Borough or, in any location outside identified Limits to Development. There are advantages in the development of live-work units in rural areas which reduces the need to travel in accordance with the overall aims of sustainable 	The draft Local Plan does seek to support the rural economy through Draft Policy LP16. However, the plan also seeks to support sustainable development and reduce vehicle movements which could result from encouraging businesses in our more rural areas. The Local Plan contains considerable flexibility in the supply of employment land in the context of identified need. We will consider whether the level of support provided to the rural economy meets the Council's vision for the Borough in the future.

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	 development in the NPPF. Whilst priority is given to sites in urban centres to support the vitality and viability of the town centres, new homes as well as employment opportunities, including offices, leisure and tourism uses are also necessary to help sustain healthy rural economies and communities. Conversion and re-use of existing buildings and the redevelopment of previously developed land and buildings for employment uses in the countryside can provide a sustainable way of accommodating such development outside urban and town centres in accordance with the three main objectives of sustainable development (economic, social and environmental) set out in the NPPF. These forms of development can also contribute to the mix of accommodation for small and medium sized businesses. Draft Policy LP16 should be amended to support planning permission for rural economic development and live/work units outside settlement limits. Bullet points could be adapted to set a criteria-based framework to clarify when such development could be considered acceptable and should be cross-referenced to Draft Policy LP1as a specific exception 	
EDCLP/252 Leicestershire County Council	 Assume any rural economic development would also need to meet requirements on not damaging the environment, meeting net biodiversity gain, mitigating and adapting to climate change etc? 	That assumption is correct, the Draft Local Plan should be read as a whole and relevant policies applied in the overall planning balance.
EDCLP/252 Leicestershire County Council	 Policy PL16 is supported as it provides the opportunity to stimulate economic growth through the diversification of rural farming businesses and the economic use of underutilised assets. 	The support is welcomed.
Q22 - LP17 - Towr	Centres and Retail	A
	comments on this draft policy?	
	with the proposed policy please set out why and what alternative	e approach would you suggest?
	ave missed something?	Noted the policy framework in the draft level plan is as ordinated with
DCLP/6 Mr Robbie Kerr	I applaud the motive and drive for the draft policy. I would suggest the implementation requires thought and better joined-up thinking across Loughborough. There seems to have been a shift in the Business Improvement District towards financing policies that save local businesses money, and less towards encouraging footfall in to the town. There are some very successful initiatives, but I feel the	Noted – the policy framework in the draft local plan is co-ordinated with the Council's corporate approach to economic development and regeneration, and so there is a direct relationship between the local plan's ambitions and those set out in the Economic Development Strategy 2018 – 2020.
	work required to promote a joined up offer needs more direct	The Council acknowledges that residential development will be integral to

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	action. I think it is also important to consider housing under the wider context of the economic value to Charnwood, especially with taxation. Student housing is important to the success of the University, but may not support council tax returns, or indeed a town centre bereft of occupation outside of school term dates. A thriving town economy needs residents all year round, not just for 35 weeks a year.	the future of town centres, and to support vitality and vibrancy. The proposed regeneration and new development opportunity sites are for a mix of student and residential occupation.
DCLP/79 Mr Paul Unwin	I think it is unlikely that a commercially viable town centre is achievable in Shepshed. However, the place, and those who live here, deserve an attractive, accessible and functional centre with a purpose.	The regeneration of Shepshed and promoting Shepshed as a viable urban centre are the primary functions of Draft Policy LP15 and Draft Policy LP17.
DCLP/111 Mr Dennis Marchant	The policy is supported.	Noted – support is welcomed.
DCLP/157 Mr David Campbell-Kelly	Absolutely agree that opportunities for town centre redevelopment for housing should be exploited. Authorities need to recognise that there has been a change from traditional shopping to internet. Provision cannot be made for huge logistics and whilst carrying on blindly believing that the high street will be unchanged.	The Council acknowledges that residential development will be integral to the future of town centres, and to support vitality and vibrancy.
DCLP/231 Mr Gideon Cumming	I disagree with the proposal to allocate space for a new town centre development, until such time as there is greater occupancy of the existing retail spaces. I am concerned that providing a new block of town centre development will further reduce the demand and use of the existing retail spaces.	The Council acknowledges that the role and function of town centres is evolving. As such, there is likely to be a change in the quantity, type, and location of retail units. That said, the Council is determined to support a high quality and diverse retail offer within Loughborough. The Baxter Gate / Pinfold Gate proposal represents an opportunity to add to the success of the existing scheme and boost the vitality and vibrancy of the town centre.
DCLP/237 Mr John Catt	6.61 The town will be easy to access with a well-connected network of vehicular and pedestrian routes. Activity in the town will be supported by a range of events and innovative marketing, business and promotional strategies that will make Loughborough a great place to be. Suggest this should read "a well-connected transport network including routes that will encourage active travel (cycling and walking) and discouraging the use of cars to access the town. Loughborough is largely flat and of a size where all areas are within a reasonable cycle ride. We should be aiming at emulating the university city of Groningen - see https://en.wikipedia.org/wiki/Groningen#Transport and https://www.youtube.com/watch?v=fv38J7SKH_g&t=83s .	Noted – the Council welcomes the proposed changes to the policy wording and supports the aim to promote active travel. Draft Policy LP33 sets out an approach to increase walking and cycling in the borough. This response will be used to inform the next draft of the local plan.
DCLP/362 Mr John Barton	As I said, free parking, safer walking and cycling, and free public toilets. Build them and we shall return to our town centres. Stop	The proposals set out in Draft Policy LP17 aim to make the town centres more attractive and boost activity rates.

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	agonising over all that 'points of arrival' and 'disjointed' stuff.	Those aspects linked to the financial cost of car parking and public conveniences are outside the scope of Draft Policy LP17, but are wider considerations for the Council. This response will be used to inform the Council's corporate approach to these issues.
LDCLP/02 Anonymous	Shepshed needs more development not just in the Bullring & Market Place I would spread the new developments and services to all areas of Shepshed not just the centre. Do you think we have missed something?	Draft Policy LP15 aims to regenerate Shepshed through a range of measures supporting improvements to the town centre, business space, and community facilities. Equally, Draft Policy LP17 identifies measures and improvements which
LDCLP/15 Anonymous	Yes many housing estates need a local spar etc Only comment relating to Baxter Gate is the 'new' leisure/cinema complex now has empty shops that have closed down since the site was built – to develop this area would require careful costing/correct levels of rent fees etc. to ensure occupancy	are not only focused on the district centre. Noted – supporting the future of the Baxter Gate leisure complex and the planned development proposal to the south is a corporate priority.
LDCLP/22 Anonymous	Town centres appear to be dying off – use it for housing	The Council acknowledges that residential development will be integral to the future of town centres, and to support vitality and vibrancy.
LDCLP/34 Anonymous	Could there be a traditional hardware store? A one time, there was at least two. The location of bus stops needs better signage and protection from the weather.	The exact make-up of the town centre, and the occupation of individual retail units is not within the control of the Council, or Draft Policy LP17. However, the proposals in the draft local plan aim to improve the vibrancy and vitality of the town centres to support a diverse range of retail units.
LDCLP/51 Anonymous	Regeneration of towns/centres think about planet sustainability long term. If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? Stop encouraging car driving to go shopping	Promoting greater use of public transport, walking and cycling by improving accessibility to the town centres is a critical aspect of Draft Policy LP14, Draft Policy LP15, Draft Policy LP17, and Draft Policy LP33.
EDCLP/74 Mr Hussain	 6.52 no comment 6.53 Why just main town centres? What about arterial routes leading into the town centre? Disagree with this entirely and feel that this prejudices other businesses; we want to see shop front improvements on all such routes that will create an interesting and alluring build up prior to reaching a magnificent town centre. 6.54 no comment 6.55 no comment 6.56 no comment 6.57 With reference to the Love Loughborough (Business Improvement District) and its activities what exactly is it doing for 	Improving accessibility to the town centres is a critical aspect of Draft Policy LP14, Draft Policy LP15, Draft Policy LP17, and Draft Policy LP33. Similarly, the Council recognises the importance and urgency of delivering the necessary residential development to meet local needs. However, whilst providing safe and secure accommodation for all is a primary concern, the local plan must address other facets of everyday life – including the provision of employment, services, infrastructure, and the promotion of good health and well-being – and must do so for all sections of society.
	the SME, i.e. in what manner is it assisting them and what age groups are being targeted in this activity?6.58 See above comment at 6.536.59 No comment	To approach multi-dimensional challenges from a single-issue point of view would run the risk of inadvertently promoting other issues to arise. The local plan aims to tackle all aspects linked to securing a sustainable future for the borough.

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	 6.60 Worry about the people rough sleeping in it before you start spending money in the town, #housing1st 6.61 Nothing is great nor can it be great until the people are safe and secure in their own adequate homes and their sense of community cohesion, has been given the fullest opportunity to coalesce within the pride of a thriving town. "The purpose of human life is to live happily and to prosper, the function of government is to provide the conditions to allow that to happen". 6.62 no comment 6.63 We have plenty of retail outlets already that can adequately cater for all of Loughborough's inhabitants; this cost is not an urgent issue and nowhere as near as urgent as the housing crisis. This section of the plan fails until people are adequately housed. 6.64 All of these things can and should wait. No cost should divert away from adequate housing within the borough. This section of the plan fails because the development of human beings by placing an adequate and decent roof over their heads will always take precedence above all other things which are meaningless by natural comparison. 6.65 Is this the best our council can come up with? Pop up shops and increasing the size of lanes in and around the town centre at a time when people are dying, living in abject poverty, statutory overcrowded and the untold levels of mental anguish & unnecessary family break ups, then you wonder why society is broken? Charnwood has lost the plot with its priorities in total disarray! 6.66 First fix the run-down commercial premises that there already is in and around the town and get people adequately housed first and foremost above every other consideration for the town. 6.67 See above notes at 6.63 6.86 ea bove notes at 6.57 6.90 ho comment 6.70 Have you actually lost the plot? Housing first for the people, then worry about invigorating the entrepreneurial spirit for district centres. 6.71 Develop your human beings before y	

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	 adequate housing with immediate effect. Everything else is not even a close second thought. 6.74 no comment 6.75 Housing first, create as many corridors as you want to afterwards but housing is and will always carry the largest burden for a responsible authority and must always be given precedence above all other endeavours. 6.76 no comment 6.77 and so they shall continue to do so and no doubt improve themselves as soon as everybody is adequately housed in decent homes. 	
	Draft Policy LP 17 No money should be wasted on any projects, the entire pot has got to address the biggest concern which is housing, the rest will just have to wait until people's mental health and well-being is addressed and that can only happen once people have that home life security.	
	There is only one alternative and that is #Housing1st	
	Do you think we have missed something? Just a little	
EDCLP/95 Barrow Upon Soar Parish	The Policies Map defines the boundary of the Barrow upon Soar District Centre but so does the Barrow upon Soar Neighbourhood Plan.	Noted – the proposed approach is based upon the evidence base from the Charnwood Retail and Town Centre Study 2018.
Council	Barrow upon Soar is identified as a 'District Centre' and as such the threshold for the requirement for an impact assessment is 500m ² (or 300m ² if the proposal is located within 800m). The evidence produced as part of the preparation of the Neighbourhood Plan	The Council's approach conforms with Paragraphs 89 and 90 of the NPPF, in terms of setting a locally defined threshold for applying the impact test.
	identifies that the largest retail unit in Barrow is 285m ² (the Co-Op). Draft Policy LP17 could therefore allow retail provision almost twice as big as the largest exiting retail unit without the need for an impact assessment. A threshold of 200m ² would be more appropriate given the size of the existing retail units.	Furthermore, it must be borne in mind that compliance with the sequential and impact tests does not guarantee that permission will be granted – all material considerations will need to be considered in reaching a decision.
	The Draft Charnwood Local Plan 2019-36 should take steps to ensure that impact assessment thresholds and village centre boundary are aligned or refer to Neighbourhood Plan Policy BuS7.	This response will be used to inform the next stage of the draft local plan.
EDCLP/108 Sue Barry	Affordable rentals for shops. More specialist retail shops to encourage visitors to Loughborough (something can't buy on internet). Board game playing café, community spaces, more green spaces	The Council acknowledges that the role and function of town centres is evolving, and that a 'different' offer will be required to encourage people to continue to use the town centres.
	Doard game playing care, community spaces, more green spaces	

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	in town, trees in centre of town Place where people can learn how to look after the landscape, create green spaces in their gardens, learn how to garden, look after wildlife.	The proposals advocated are well-considered and helpful. Whilst the Council is not in direct control of who occupies individual retail units, the ideas set out in this response will be used to inform the next stage of the local plan and wider corporate approaches to creating vital and vibrant town centres.
EDCLP/121 Marie Birkinshaw	Again support for small businesses is key and training opportunities at various levels to promote jobs.	Draft Policy LP17 aims to promote a diverse range and mix of businesses within the town centre.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We broadly agree subject to addressing clumsy wording. After District and Local Centres all references to 'town centre' and 'town' should be removed.	Noted. Any typographical errors will be amended.
EDCLP/164 Dr S.J.Bullman Storer & Ashby Area Residents Group (SARG)	Do you think we have missed something - Yes – you continue to accept (and thereby promote further) student accommodation proposals in the Town centre. These do not make for " a significant contribution to the regeneration and continued vitality of Loughborough town centre " and the associated bullet points - so the Draft policy should add wording to that effect.	The Council acknowledges that the role and function of town centres is evolving. Residential development (for students and residents) is likely to feature more prominently in the future of town centres, helping increase overall activity rates and helping regenerate key sites across the borough.
EDCLP/165 Dr S.J.Bullman	Do you think we have missed something - Yes – you continue to accept (and thereby promote further) student accommodation proposals in the Town centre. These do not make for " a significant contribution to the regeneration and continued vitality of Loughborough town centre " and the associated bullet points - so the Draft policy should add wording to that effect.	The Council acknowledges that the role and function of town centres is evolving. Residential development (for students and residents) is likely to feature more prominently in the future of town centres, helping increase overall activity rates and helping regenerate key sites across the borough.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife	Planting to benefit wildlife and combat climate change should be considered, how about planting wildflowers to benefit pollinators and more urban trees? Also linking up existing green spaces. Urban areas also contribute to Nature Recovery Networks. Wildlife-	The Council acknowledges that the role and function of town centres is evolving, and that a 'different' offer will be required to encourage people to continue to use the town centres.
Trust	friendly planning in the urban areas would also make them more attractive places to visit, work and live.	The proposals advocated are well-considered and helpful. Whilst the Council is not in direct control of who occupies individual retail units, the ideas set out in this response will be used to inform the next stage of the local plan and wider corporate approaches to creating vital and vibrant town centres.
EDCLP/226 Eleanor Hood	How will you make this happen when you do not control the ground rents the landlords charge for their retail units? Do they pay extra council tax when a retail unit has been unoccupied for more than 12 months?	Draft Policy LP17 is written in order to provide a framework within which developers, landlords, the Council, and private sector partners can operate.
		The Council does not control the occupation or rent level of units that are within private sector ownership. But, the policy can promote and support initiatives that can stimulate activity and interest in town centres.

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Barbara Fisher L	Encouraging people to live in the town centre is admirable. Unfortunately all too often it is student accommodation that is being provided within this area and not affordable housing for residents.	The Council acknowledges that the role and function of town centres is evolving. Residential development (for students and residents) is likely to feature more prominently in the future of town centres, helping increase overall activity rates and helping regenerate key sites across the borough.
CBC dd Neighbourhoods and Community Well Being la L L L L L L L L S S S P L A S S S P L A S S S P L A S S S S P L A S S S S S S S S S S S S S S S S S S	 5.54 We have a hierarchy of centres in Charnwood which perform different functions: Loughborough Town Centre – is the top of our hierarchy of centres, as it is the largest and the main focus for retail, thriving markets, eisure, offices, arts, tourism and cultural activities in Charnwood, particularly the north of the Borough. District Centres – usually comprise groups of shops, often including at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library. Local Centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include a small supermarket, a newsagent, a sub-post office and a oharmacy. Other facilities could include a hot-food takeaway and aunderette. Loughborough Town Centre 5.55 Loughborough's town centre includes a historic Market Place nome to weekly retail, vintage and a farmers markets, a variety of shops and services but faces competition from larger centres like leicester, Nottingham and Derby, along with new models of internet based shopping and other forms of online commerce. 6.56 To help us develop the town centre and ensure its continued <i>viability</i> and vitality we have produced a Loughborough Town Centre Masterplan. It was adopted in April 2018 and presents the spatial vision for the development of Loughborough town centre. It was prepared in consultation with those who visit, work in or run pusinesses in the town centre special: a compact walkable town centre with the Market Place at its heart, which provides an attractive focus for the town; a variety of shops with a mix of high street and independent retailers; 	Noted.

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	 a number of attractive open spaces in the centre including Queen's Park, Southfields Park and Parish Green; Love Loughborough (the Business Improvement District) is delivering a programme of activities and events to enhance the centre and assist businesses; and the presence of civic, cultural, leisure and entertainment facilities within the town centre. 	
EDCLP/202 Planning and Design Group (UK) Limited obo GC No 37 Limited (Godwin Developments)	We are currently entering a period of economic uncertainty. It is incumbent on the Plan to ensure relevant opportunities to support the local economy can be realised without allocation. In its current form, draft policy LP15 does not present sufficient flexibility to approve speculative development proposals in Shepshed, which go beyond the specified policy criteria, to ultimately achieve significant regeneration in the town.	The approach to regeneration in Shepshed is deemed sufficiently flexible to allow for a range of positive development opportunities to come forward. Similarly, the policy requirements in Draft Policy LP17 are flexible to meet the needs of the borough, whilst also directly responding to the instructions set out in the NPPF and PPG.
	Further, potential development proposals that improve access to community facilities particularly for future residents of proposed urban fringe developments, are constrained by the rigid approach of draft policy LP17, presenting a potential for conflict where proposed community facilities are defined 'main town centre uses'.	
EDCLP/192 Severn Trent Water	Severn Trent are unable to provide any specific comments on policy LP17 Town Centres and Retail, but would not raise any objections to the principles of permitting development that will support economic regeneration and enhancement within town centres.	Noted.
ELDCP/159 C.Mulvaney	 22 (a) I agree that there needs to be a significant improvement to the character and appearance of Loughborough town centre. Previous developments have led to an ugly and unappealing town centre and any future developments should add to the character of the town centre. 22 (b) 6.53 We want to see main town centre uses (4) being focussed in our town centres rather than in other locations. The development of such uses outside our town centres will not help us to deliver our vision. So why is the Council allowing Wilson-Bowden to build retail outlets on the land to the east of the M1 and south of the A512 which will further reduce the demand for town centre shopping? 6.61 The town will be easy to access with a well-connected network 	 Draft Policy LP17 does not prejudge any current application. This will be determined in accordance with the development plan, unless material considerations indicate otherwise. Comments relating to accessibility and making provision for cyclists is noted. This will be considered as part of the next draft of the local plan. The Council acknowledges that the role and function of town centres is evolving; and that the centre of gravity of Loughborough town centre changes as new development occurs. It is likely that alternative uses will emerge in the town centre as spending habits and lifestyle choices change.
	of vehicular and pedestrian routes Why is there no mention of provision for cyclists? Promoting cycling	

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	is the way forward and then the weakness in 6.58 of lack of car parking space will be mitigated.	
	6.58 numerous town centre car parks but overall there is a shortfall in parking spaces.Is there a shortfall of parking spaces? Whenever I drive into town, I never have a problem parking.	
	22 (c) I think it is also important to consider the shopping areas of Ward's End in any local plan. There are many independent shops along this stretch of road and this road also has retained much of its old character which makes it an attractive shopping area. The Local Plan should not focus on Baxter Gate to the detriment of businesses on Ward's End.	
	The way we shop is changing, as you state, and we are buying much more online now. One of my personal reasons for this is that I work roughly 9 to 5 and the shops in Loughborough are generally open 9 to 5 and hence when I finish work the shops are shut. Thus, the shops are open while many of us who are earning money are at work and can't get to a shop. While this is something that is maybe beyond the Local Plan, I do think local retailers need to consider changing their opening times to meet with the needs of their potential customers. While shopping habits have changed, many retailers' habits appear not to have done so.	
	The council seems to be keen to broaden shopping areas, while shops in the town centre stand empty. There has been much recent development of The Rushes and Baxter Gate, and thus the main shopping is being dragged to that end of town, to these purpose built shopping areas and Loughborough is looking more like every other middle-sized town. It is often independent retailers that give a town its unique atmosphere.	
EDCLP/253 Ann Irving	The town centre is declining, along with national trends. Is another retail centre really needed? The rising generation is already attuned to online shopping – they don't question the impact of online shopping on the sustainability of communities. For the size of the town centre population [out of term time] there are surely enough supermarkets, while small shops appear to struggle for custom. The town centre balance is increasingly in favour of charity shops and a few national chains. It is hard to see the justification for more retail outlets.	The Council acknowledges that the role and function of town centres is evolving. As such, there is likely to be a change in the quantity, type, and location of retail units. That said, the Council is determined to support a high quality and diverse retail offer within Loughborough. The Baxter Gate / Pinfold Gate proposal represents an opportunity to add to the success of the existing scheme and boost the vitality and vibrancy of the town centre.

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EDCLP/239 Vivienne Barratt- Peacock	Policy supported. Toilets are hard to find in Loughborough, even for disabled people. I pushed my disabled father around Loughborough in his wheelchair trying to find a toilet after being turned away at the Town Hall. The one they suggested was too far for me to get him to in time.	The Council appreciates that access to facilities, such as public conveniences are a principal concern for the public. This response will be used to inform the next stage of the local plan; and also be an input in to future economic regeneration initiatives being delivered by the Council.
EDCLP/149 Andrew Thomas Thomas Taylor	Draft Policy LP17 should be amended to acknowledge that the sequential test implied by Draft Policy LP1 does not apply to applications for small scale rural offices or other small scale rural	The Council expects to implement the sequential test and impact test in accordance with the NPPF and the PPG.
Planning Ltd obo Charnwood Accountants	development; nor to proposals for the refurbishment or redevelopment of existing offices outside town, district and local centres where no material increase in floorspace is proposed; nor	The threshold set out in Draft Policy LP17 is derived from the evidence base, and from the Charnwood Retail and Town Centre Study 2018.
recountants	to proposals which are in accordance with Draft Policies LP12 or LP16 concerning rural economic development or other policies in the draft Plan.	The relationship between Draft Policy LP17, and the intentions set out in Draft Policy LP12 and Draft Policy LP16 is noted. Where appropriate, the policy wording will be amended to improve the overall policy framework for decision-taking.
	NPPF paragraph 89 suggests that impact assessments should be provided for retail and leisure development outside town centres but it also sets out the limited range of circumstances under which these should be sought and it does not require impact assessments to be applied to office-related development.	
	Draft Policy LP17 requires the submission of impact assessments for proposals for office development although the draft Plan provides no justification for requiring office development to be subject to such assessment. The draft Plan also provides no justification for the locally set 500sqm (gross) threshold at which they are to be required - which is significantly below the 2,500sqm threshold set out in paragraph 89 of the NPPF.	
	It is also unclear whether this threshold applies to the amount of floorspace at a site as a whole, or whether it is limited to the net increase in floorspace proposed (which might be the case where a small addition of less than 500sqm is proposed to support expansion of an existing use which together with existing	
	floorspace would exceed the 500sqm threshold). Furthermore, there is no indication as to what the impact assessment is expected to address nor how the results of such an assessment will be	
	objectively used in the determination of such applications. This part of Draft Policy LP17 is unclear and places an unjustified administrative burden on applicants which, without further	
	clarification appears to be of little value to the development management process and will hinder economic development and	

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	the provision of employment in rural areas otherwise supported elsewhere in the draft Plan and the NPPF. TTP/C26 Draft Charnwood Local Plan 2019-2036 Charnwood Accountants Page 4 of 5	
	Draft Policy LP17 should be amended to clarify that impact assessments are not required for applications for office development outside town, district and local centres where they are in accordance with Draft Policies LP12 or LP16 concerning rural economic development or other policies in the draft Plan and that they are not required for proposals for the refurbishment or redevelopment of existing offices outside town, district and local centres where no material increase in floorspace is proposed. Furthermore, in the absence of any firm justification for the use of the 500sqm threshold beyond which an impact assessment is required, the 2,500sqm threshold adopted in the NPPF should be preferred and Draft Policy LP17 should be amended accordingly. If the impact assessment element of Draft Policy LP17 is retained and continues to be applied to office development in rural areas then it should be amended to clarify the required content of impact assessments and to confirm that office development will only be refused where it would have a significant adverse impact on town, district or local centre vitality and viability, (as applicable to the scale and nature of the scheme).	
EDCLP/252 Leicestershire County Council	Should it not also refer to providing infrastructure that encourages the use of electric vehicles be that private vehicles, taxis, buses etc.	Improving and enhancing public transport in the town centres is a primary aim of the draft local plan. This can be seen in overall emphasis of Draft Policy LP1, Draft Policy LP14, Draft Policy LP15, Draft Policy LP17, and Draft Policy LP33.
EDCLP/252 Leicestershire County Council	Query the need for even the remaining non-food allocation given the move to on-line sales and the number of empty units – is there a way of encouraging use of existing empty units before new ones are built?	The Council acknowledges that the role and function of town centres is evolving. As such, there is likely to be a change in the quantity, type, and location of retail units. That said, the Council is determined to support a high quality and diverse retail offer within Loughborough. The Baxter Gate / Pinfold Gate proposal represents an opportunity to add to the success of the existing scheme and boost the vitality and vibrancy of the town centre.
EDCLP/252 Leicestershire County Council	We recognise the intrinsic value of the natural environment, its value as natural capital and the range of ecosystem services that it provides.	Noted – incorporating the natural environment into town centres and maximising their value to the public and to business is a priority for the local plan.
	This is not so evident within the document. Still feels as if the environment is secondary to economic growth and housing development.	

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EDCLP/252 Leicestershire County Council	– how is the plan going to address issues around charity shops a betting shops?	The exact make-up of the town centre, and the occupation of individual retail units is not within the control of the Council, or Draft Policy LP17. However, the proposals in the draft local plan aim to improve the vibrancy and vitality of the town centres to support a diverse range of retail units.
EDCLP/272 Centre for Sustainable Energy via Cllr Needham	Draft policy LP17 is excellent, but development of this scale and i this location should go beyond providing pedestrian links to immediate areas of open space. Your masterplan suggests strategic cycle / pedestrian routes going straight through the centre but the policy doesn't pick up on them. I'm familiar with Loughborough and roads around the town centre seem car dominated and would be off-putting to most cyclists. This is just the sort of location, scale and mix of development whit could support district heating. Your evidence should be explored to see whether district heating would be feasible here, and whether could be made a requirement for these developments. Given the climate emergency and the reductions needed in transport emissions, there are major reservations about planning for a majo new car park in the town centre. The plan should make the most of sustainable locations like this and plan to reduce parking and assume access via public transport, walking and cycling.	 The Council welcomes the constructive feedback and proposed changes to the draft policy. These amendments will be considered as part of the next draft of the local plan. The delivery of additional infrastructure will be considered where it is justified and where it can be delivered without compromising viability.
Q23 - LP18 - Hot I	L Cood Takoowaya	

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If you don't agree	comments on this draft policy? with the proposed policy please set out why and what alternative nave missed something?	e approach would you suggest?
DCLP/42 Ms Suzanne Collington	No comment except car parking is an issue with takeaways - people pull up on double yellow lines.	Noted – the policy sets out mechanisms to consider the impact of car parking.
DCLP/364 Mr John Barton	We need biodegradable packaging. We need more litter bins. In the meantime, we have a fork in the road. I see lots of plastic forks in the road	Noted – the policy cannot directly deal with the issues identified. But, by managing the concentration of premises, indirect issues associated with waste and recycling can also be managed.
LDCLP/02 Anonymous	More rubbish bins Shepshed needs at least a Macdonalds for employment of it young people. Do you think we have missed something? Yes lack of food for young people and employment	Noted – the policy cannot deal directly with waste management. However, stimulating economic growth and employment opportunities is a key part of the draft local plan – see Draft Policy LP1, and Draft Policy LP12 to Draft Policy LP17 for further details.
LDCLP/22 Anonymous	Hot food take aways should be greatly restricted and they should be made responsible for clearing up the rubbish they generate. In particular MacDonalds seems to generate huge amounts of rubbish both packaging and food	Noted – the policy cannot deal directly with waste management. But, by managing the concentration of premises, indirect issues associated with waste and recycling can also be managed.
LDCLP/51 Anonymous	There are too many. Less encouragement of them because of the effect long term on people's health and environment.	Noted – the policy sets out mechanisms to consider the impact on health and the environment
EDCLP/34 Cllr Mary Draycott	There are too many and need to be reduced.	Noted – the policy sets out mechanisms to manage the concentration of establishments.
EDCLP/74 Mr Hussain	6.78 no comment 6.79 More healthy hot food diversity via youth entrepreneurship should play a key role to improvements for healthier options, i.e. Freshly made oatcakes for example ("it's a Stoke-on-Trent thing and can be made very profitable for our youth"). As a responsible authority it is things such as this where it needs to take charge due to the set-up costs and youth guidance. Any empty commercial buildings on a street front would suffice for this type of engagement naturally with modifications done to it to accommodate the activities of the business. #Entrepreneurs all the way!	Noted – the policy cannot deal directly with waste management. However, stimulating economic growth and employment opportunities is a key part of the draft local plan – see Draft Policy LP1, and Draft Policy LP12 to Draft Policy LP17 for further details.
	Do you think we have missed something? Yes, you missed an oatcake outlet that can revolutionise the way Loughborough has early morning breakfast and can be franchised all around the borough and surrounding areas and even further afield. It is a new, healthy and very exciting food for the people of Loughborough and our youth can lead a meaningful way of life from it whilst enjoying the fruits of their labour and if they have any	

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	eruditeness about them, they can take this to an unimaginable level. #HelpOurYouth because they are our tomorrow and from every packet of a dozen oatcakes sold, they can offset a small but meaningful percentage to Animal Welfare organisations who also play such a critical role in our society "as a suggestion". Unless we are different Charnwood, we will be a very boring place to live with hopes and dreams that just pale into insignificance. Is this the kind of Charnwood we want? We have to be multifaceted and bold in our actions to deliver prosperity to our youth and if we don't do this, the youth will maintain a lack of respect for the borough's unwillingness to address issues in which they are too young to address themselves. I want the world to know about Charnwood. We have got talent we need to invoke it and inspire it!	
EDCLP/95 Barrow Upon Soar Parish Council	While supporting Draft Policy LP18 there are other clusters we might wish to avoid such as value retailers, bookmakers and bars. The Draft Charnwood Local Plan 2019-36 should take steps to ensure that Draft Policy LP 18 is aligned or refer to Neighbourhood Plan Policy BuS7.	Noted – the draft local plan will have regard to the policies in the Barrow upon Soar Neighbourhood Plan.
EDCLP/108 Sue Barry	No more Hot food Takeaways please as oversubscribed Healthy eating café/ veggie/ vegan	Noted – the policy sets out mechanisms to manage the concentration of establishments.
EDCLP/121 Marie Birkinshaw	Sounds sensible	Noted – support is welcomed.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	Broadly agreed.	Noted – support is welcomed.
EDCLP/226 Eleanor Hood	No Comment	Noted
EDCLP/192 Severn Trent Water	Severn Trent welcome a policy to manage and control the development of Hot Food takeaways. Due to the nature of their businesses they often involve the use / production of fat, oil and grease. These pollutants often make their way into the sewerage system. Fats, oils and greases are known to have a detrimental impact on the sewerage system resulting in blockages. This is recognised within Building Regulations Part H paragraph 2.21, which requires	Noted – the policy sets out mechanisms to manage the concentration of establishments. STW will be aware that the controls on waste disposal fall within the conditions that may be attached to a permission, and within the Building Regulations.

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	commercial kitchens to be fitted with a grease separator.	
	Whilst the inclusion of grease separator will help to reduce the amount of pollutants entering the sewers, it is unlikely to prevent it all together, therefore if too many commercial kitchens are located in close proximity, there is an increased risk of sewer failure. We are therefore supportive of the principles outlined within Policy LP18.	
EDCLP/239 Vivienne Barratt- Peacock	Takeaways are clustered in Rothley 5 out of 10 shops are takeaways which are generally only open at night. I support this policy of limiting the amount that are close together.	Noted – support is welcomed.
EDCLP/193 Richard Webb	I think there should be some guidance or direction in relation to mitigating the negative effects of the establishments. A written policy or otherwise around the requirements to deal with littering and noise.	Noted – the policy sets out mechanisms to manage the concentration of establishments.
Mr Gideon	l agree.	Noted – support is welcomed.
Cumming		
Chapter 7 - I	Environment	
Do you have any If you don't agree	Iscape, Countryside etc. comments on this draft policy? with the proposed policy please set out why and what alternative have missed something?	e approach would you suggest?
DCLP/19	Much of the proposed housing will take up agricultural and	The SA has considered a series of potential growth options. The SA
Dr Catharine Ferraby	greenfield sites.	includes consideration of land take and the quantum of land that would be lost to development. It is considered that the low growth scenario achieves a more appropriate balance between facilitating growth, whilst minimising impacts on the environment.
DCLP/45	We need to keep the separation of villages by protecting green	The draft local plan identifies and provides a policy framework for 16
Ms Suzanne	spaces not joining villages up in one long sprawl from	Areas of Local Separation. The principle of maintaining these areas is a
Collington	Loughborough to Leicester.	priority for the Council.
DCLP/109 Mr Dennis	It is believed that the Areas of Local Separation should be	The draft local plan identifies and provides a policy framework for 16
Marchant	maintained at all costs and therefore, the proviso that if new development clearly maintains the physical separationshould to prevent confusion be removed.	Areas of Local Separation. The principle of maintaining these areas is a priority for the Council.
DCLP/187	QPC strongly believes that the Areas of Local Separation should be	The suggested amendment to Draft Policy LP19 is noted.
Quorndon Parish	maintained at all cost and therefore, the policy should reflect this	The draft local plan identifies and provides a policy framework for 16
Council	and the statement 'We will protect the predominantly open and undeveloped character of Areas of Local Separation unless new development clearly maintains the physical separation between the	The draft local plan identifies and provides a policy framework for 16 Areas of Local Separation. The principle of maintaining these areas is a priority for the Council.

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DCLP/220 Professor David Infield	built up areas of these settlements' be amended to state: We will protect the predominantly open and undeveloped character of Areas of Local Separation and clearly maintain the physical separation between the built-up areas of these settlements The QPC and the residents via the Neighbourhood Plan consultations have repeatedly made it known that to maintain the AoS is of the greatest importance to them. They want the character, independent rural identity, and distinct features of the village to be separated from adjoining urban areas. Green Wedges are good in principal but have no legal standing. I cannot understand why Charnwood, unlike many other local authorities, makes no use of the Local Green Space Designation. This can be used to protect valuable green spaces from development, in particular within the urban environment. It can be used to protect allotments, green areas within developments, parks, and green corridors alongside roads where they exist. Such designation provides real protection and failing to make use of this valuable designation undermines Charnwood's commitment to	The draft local plan identifies and provides a policy framework for three Green Wedges. The principle of maintaining these wedges is a priority for the Council. Should Draft Policy LP19 form part of the statutory development plan, then the Green Wedges will be afforded status. The Council will be refining the policy in light of this response. LGS are not intended to apply to large areas of green space, such as those identified as Green Wedges. LGS are intended to apply at a local level, providing locally important small-scale green spaces with protected
DCLP/232 Mr Gideon Cumming	sustainable development. In addition to supporting development that retains the open undeveloped character of the green wedge, I would suggest that the policy states that the Council will not permit development that detracts from, or reduces the green wedge.	status. Noted - The Council will be refining the policy in light of this response.
DCLP/285 Natural England	Natural England generally welcomes this policy but suggests that you may want to refer to the National Character Areas.	The evidence base use to inform Draft Policy LP19 is the Landscape Character Assessment (June 2019). The methodology and data used in the Landscape Character Assessment draws down on the National Character Areas.
DCLP/312 Dr Satbir Jassal	 We feel that there are significant shortcomings in ALS1 Loughborough and Woodthorpe. 1. There was no local consultation with the residents of Woodthorpe village in the amendments that were made in April 2018. 2. Reduction in the area of separation proposed would have an adverse effect on the countryside between Loughborough and Quorn. 3. It would have a severe impact on the traffic on Main Street in Woodthorpe 4. It would damage the historical character and integrity of the hamlet of Woodthorpe. 5. It would have a detrimental impact on the recreational activities of the local community who currently use the area for dog walking, cycling, jogging and rambling. 	The Areas of Local Separation have been defined via an evidence-based approach, based upon technical work carried out in 2016.

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	6. Ultimately it would lead to the hamlet of Woodthorpe being assimilated into the town of Loughborough which goes against the vision of maintaining separation and identities of small settlements.7. It would represent only one further short step before Quorn becomes absorbed into the town of Loughborough.	
DCLP/321 and DCLP/322 Mr Phil Sheppard	I strongly support this policy. I think the importance of landscape views should formally be included in the Policy. I know views from individual dwellings can't be protected by planning policies or decisions, but I think general views of importance for well-being, including mental health, can be. It's no good having Local Areas of Separation if development still degrades outstanding views as intangible assets of the Borough. I strongly support new public rights of way. If they aren't created, you will have a situation like that before the Kinder Scout trespass of 1932; people will start to take things into their own hands. But why limit new rights way only to the times and places associated with new developments? I think the policy should also say that the Planning Authority will be proactive in working with local communities and landowners to create sustainable new definitive paths and/or rights of way? A good example of an area which could increase public amenity greatly is Johnscliffe Wood, adjacent to Bradgate Park. We need to spread amenity beyond the honeypot areas.	Protecting landscape character, which includes views, is an inherent part of Draft Policy LP19.
DCLP/366 Mr John Barton	Yes, green spaces and biodiversity. Joined up green corridors are important with semi-wild places – but also well-lit and CCTV protected paths. I can see that over-grown vegetation is off-putting to walkers and cyclists.	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority.
LDCLP/02 Anonymous	Do you have any comments on this draft policy? Yes you are removing the green wedge If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? Less housing on edges of developed areas Do you think we have missed something? Yes, footpaths, cycle routes etc	 Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority. The Council's overall strategy for growth is one of urban concentration and intensification. Policy LP1 specifically aims to deliver the needs of the borough, whilst minimising the impacts of development. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy.
	018	Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work.

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		The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
LDCLP/15 Anonymous	Areas of separation doesn't include Loughborough/Shepshed?	The draft local plan does not identify an ALS between Loughborough and Shepshed.
LDCLP/22 Anonymous	Land should be set aside, landscaped to separate new developments from existing housing stock. It appears from the map that the land set aside for "open space sports pitches" is not in the vicinity of the housing developments	Noted – The three SUEs will be accompanied by Development Frameworks and masterplans, which will help to define landscape corridors, green corridors etc, where necessary.
	which will again increase reliance on the car as a mode of transport.	Other new development will be expected to minimise its impact on landscape and the natural environment, whilst positively delivering the needs and requirements of the borough.
LDCLP/51 Anonymous	We are not valuing it enough for our own survival Less destroying of countryside till we have utilised all of where we have already disrupted.	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority.
EDCLP/07 Mr & Mrs G Allen	We urge you to leave the land along Westfield lane (recently refused planning of 187 houses by Wilson Homes) running up The Ridings between The Ridings and Templar Way Rothley as a separation area and never to built on.	The area identified falls within ALS6 (Thurcaston / Crposton / The Ridgeway Area of Rothley).
EDCLP/31 Barkby & Barkby Thorpe Parish Council	The 4500 houses of the NE of Leicester SUE were sold to local people on the understanding that the new town would obviate the need for other housing in the Barkby, Thurmaston, Queniborough and Syston area. Already there have been developments totally	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority.
	around 1000 houses and the new Local Plan will add a further 1500 at the cost of the reduction of areas of separation and the coalescing together of local communities in direct contradiction of stated policies of the council. To take one example the 747 houses south east of Syston will be within a stone's throw of the northern limit of Thorpebury. Charnwood is proud to claim that Barkby is "the jewel in its crown" but fails to recognise that its rural setting is a good part of that jewel.	ALS12 (Syston / Barkby) and Leicester Hamilton Green Wedge (GW3) continue to provide separation between the village of Barkby and the current and planned new development sites.
EDCLP/32 BABTAG	The 4500 houses of the NE of Leicester SUE were sold to local people on the understanding that the new town would obviate the need for other housing in the Barkby, Thurmaston, Queniborough and Syston area. Already there have been developments totally	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority.
	around 1000 houses and the new Local Plan will add a further 1500 at the cost of the reduction of areas of separation and the coalescing together of local communities in direct contradiction of stated policies of the council. To take one example the 747 houses	ALS12 (Syston / Barkby) and Leicester Hamilton Green Wedge (GW3) continue to provide separation between the village of Barkby and the current and planned new development sites.

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	south east of Syston will be within a stone's throw of the northern limit of Thorpebury. Charnwood is proud to claim that Barkby is "the jewel in its crown" but fails to recognise that its rural setting is a good part of that jewel.	
EDCLP/36 Mr & Mrs Atkins	The 4500 houses of the NE of Leicester SUE were sold to local people on the understanding that the new town would obviate the need for other housing in the Barkby, Thurmaston, Queniborough and Syston area. Already there have been developments totally around 1000 houses and the new Local Plan will add a further 1500 at the cost of the reduction of areas of separation and the coalescing together of local communities in direct contradiction of stated policies of the council. To take one example the 747 houses south east of Syston will be within a stone's throw of the northern limit of Thorpebury. Charnwood is proud to claim that Barkby is "the jewel in its crown" but fails to recognise that its rural setting is a good part of that jewel.	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority. ALS12 (Syston / Barkby) and Leicester Hamilton Green Wedge (GW3) continue to provide separation between the village of Barkby and the current and planned new development sites.
EDCLP/43 Mr & Mrs Cunningham	The 4500 houses of the NE of Leicester SUE were sold to local people on the understanding that the new town would obviate the need for other housing in the Barkby, Thurmaston, Queniborough and Syston area. Already there have been developments totally around 1000 houses and the new Local Plan will add a further 1500 at the cost of the reduction of areas of separation and the coalescing together of local communities in direct contradiction of stated policies of the council. To take one example the 747 houses south east of Syston will be within a stone's throw of the northern limit of Thorpebury. Charnwood is proud to claim that Barkby is "the jewel in its crown" but fails to recognise that its rural setting is a good part of that jewel.	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority. ALS12 (Syston / Barkby) and Leicester Hamilton Green Wedge (GW3) continue to provide separation between the village of Barkby and the current and planned new development sites.
EDCLP/58 Dawn Anker	I would like to express my views against any potential developments in the following areas of Rothley. Rothley has already expanded dramatically with a number of large scale developments and infills. Broad nook is also Due to begin which is a massive development creating a new suburb. The green space between Rothley and Broadnook needs protecting. The fields on both sides of Westfield lane and extending to Ridings and Gypsy lane should also be retained along with the Cricket pitch and paddocks adjoining Rothley Court. Environment: To lose further green space in the village would add to the damage of the environment by creating more pollution.	 Rothley is identified as a Service Centre in the Council's settlement hierarchy and development strategy. Taken together, the six Service Centres are identified to receive 13% of the proposed new housing provision in the borough. Sites proposed in Rothley have been appraised through the site assessment process, via the SHELAA. Impacts on landscape, green spaces, the conservation area, biodiversity, the transport network, and flooding have all been taken into account in the site assessment work.
	The area of Westfield lane is in a conservation area frequented by; walkers, cyclists, horse riders etc Which is beneficial to our air 920	Draft Policy LP19 specifically seeks to protect landscape and areas of

CONSULTEE		
	 quality and wellbeing. These areas have established trees which help minimise pollution. It is also habit for a variety of wildlife and birds with whom we share our world. Rothley is ancient village with Great Central Railway and Rothley Court and it needs to retain this status to continue to attract visitors. The impact of future large scale developments in these and adjoining areas will negatively impact on local schools and doctors which are already full. It would increase the risk of flooding. Mean more roads, cars and light pollution. 	local separation, including the Birstall/Rothley ALS (ALS15).
EDCLP/59 Anonymous	I welcome the prominence given to the natural environment in the draft Plan. I support the emphasis on Areas of Separation together with reference to integration through appropriate green communications. I also welcome the specific designation of these Areas, two of which involve Quorn, and the need to 'protect' their 'predominantly open and undeveloped character' (p.78). Given Charnwood's special position within and adjacent to the National Forest, it would be most welcome if the Plan and its implementation were ambitious in playing a major/leading national role in environmental protection and enhancement (a key strategic objective set out in Chapter 3). In achieving this, all communities in Charnwood, including towns, Service Centres, villages etc. could be charged with designing and delivering a tree planting programme and related activities that are carefully staged to 2036. Although currently untested, Quorn residents might well be pleased to take the initiative in view of the many benefits to Quorn and Charnwood as a whole.	Noted – support is welcomed. Draft Policy LP20 specifically aims to define, protect, and enhance the Charnwood Forest and support the aims of the Natinal Forest. Furthermore, Draft Policy LP23 sets out how the Council will increase the number of trees in Charnwood. This includes measures to provide tree planting on-site and retain existing trees where appropriate.
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	We broadly support this policy, and welcome the recent Green Wedge Review which has resulted in some amendments to the boundaries to the Green Wedge with land which does not provide any Green Wedge functions being removed from the Green Wedge.	Noted – the Draft Policy LP19 is based on the latest evidence.
EDCLP/69 George Dunning	I would like to express my views against any potential developments in the following areas of Rothley. Rothley has already expanded dramatically with a number of large scale developments and infill. Broad nook is also due to begin which is a massive development creating a new suburb. The green space between Rothley and Broaknook needs protecting. The fields on both sides of Westfield lane and extending to Ridings	Rothley is identified as a Service Centre in the Council's settlement hierarchy and development strategy. Taken together, the six Service Centres are identified to receive 13% of the proposed new housing provision in the borough. Sites proposed in Rothley have been appraised through the site assessment process, via the SHELAA.

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	 and Gypsy lane should also be retained along with the Cricket pitch and paddocks adjoining Rothley Court. Environment: To loose further green space in the village would add to the damage of the environment by creating more pollution. The area of Westfield lane is in a conservation area frequented by; walkers, cyclists, horse riders etc Which is beneficial to our air quality and wellbeing. These areas have established trees which help minimise pollution. It is also habit for a variety of wildlife and birds with whom we share our world. Rothley is ancient village with Great Central Railway and Rothley Court and it needs to retain this status to continue to attract visitors. 	Impacts on landscape, green spaces, the conservation area, biodiversity, the transport network, and flooding have all been taken into account in the site assessment work. Draft Policy LP19 specifically seeks to protect landscape and areas of local separation, including the Birstall/Rothley ALS (ALS15).
EDCLP/74 Mr Hussain	 7.1 Then protect it instead of decimating it! 7.2 There is no point in economic investment when half the town is dead or dying or living in misery as a consequence of poor inadequate housing. If the borough wants for communities to live in high quality and a healthy environment then it has a funny way of demonstrating it. This is all platitudes with no real prospect of meaningful change to endorse what the borough is saying. If the borough is serious, then it needs to show it not talk about it, we have had more than enough talk, we have had 10 years of talk, misery and avoidable deaths all around the country as a consequence of homelessness. 7.3 So the whole community all of the sudden now needs more sports and recreational areas, shall we ask the homeless people or people living in squalid conditions if they're mentally up for the physical challenge of a jog around the sports field? I leave the borough to use their own imagination as to what the response would be. #Housing1st, people can jog around a sports field once their minds have achieved a healthier frame of it. Never come across such rubbish! 7.4 no comment 7.5 no comment as I am unfamiliar with the concept of heat island effect. 7.6 no comment 7.7 Are we focusing on our people or a building in the middle of a field somewhere that may or may not get some traction. #PeopleandHousing1st. 7.8 no comment 7.9 no comment 7.10 What about the distinct quality of our people and what is meant by affordable housing in these rural areas and will these so- 	Attempting to deliver sustainable development requires the Council (and all other stakeholders) to balance social, economic, and environmental aims and objectives. On occasion, the aims of each of the aspects which define sustainable development compete and conflict. In such circumstances, measures are required to ensure that impacts are satisfactorily mitigated. Protecting and enhancing the natural environment contributes toward Charnwood being known for a high quality of place and a high quality of life for residents and businesses. Stimulating a higher quality of life and a higher quality of place has been shown to provide the context to allow people and business to flourish. The Council is determined to meet its housing needs. This will be achieved through the policy framework set out in the draft local plan – in particular, Draft Policy LP1 and Draft Policy LP3.

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	called affordable housing be socially stratified in terms of social housing uniformity. Not good enough for the people of Loughborough especially if these rural areas are about to have the physiognomy of the landscape altered to accommodate any type of housing that will not support social housing in the main. This section of the plan fails unless the construction of new homes supports the higher needs of the community for social housing purposes only. 7.11 no comment 7.12 Which part of the community is concerned? Are we talking about community members from low income backgrounds in need of social housing or are we talking about community members already living in affluent areas of the borough who require no social housing? If it is the latter, then they have no viable argument because these will be the fools who have previously agreed to the decimation of our landscape for private housing. Their argument is left in the chaos it needlessly created to our environment. 7.13 no comment 7.14 no comment 7.15 no comment 7.15 no comment 7.17 no comment 7.17 no comment	
	There is only one approach and that is, whatever the borough is proposing to decimate by way of our biodiversity then it must only do so once the current housing stock wherever it is currently under development or developed is used for social housing purposes only. Once families are adequately housed with all modernised standards and in accordance with building regs to lead a healthy lifestyle with a healthy mindset, then and only then should the destruction of our environment take any further and serious consideration. #EnvironmentCrisis	
	Do you think we have missed something? Just a little	
EDCLP/86 Rothley Parish Council	7.15 RPC welcomes the proposed AoLS as shown on the interactive map. It is important to ensure that the historic views and vistas of this area are protected, including Rothley Park and its historic assets and views.	Noted - support is welcomed.
EDCLP/97 Marrons on	The Charnwood Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Study (2016)	Noted – the extent of the AoLS has been drafted based on the technical evidence prepared to inform the local plan.

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REPRESENTATION SUMMARY and an Addendum to that Report (May 2019) which considers comments made in response to an earlier round of consultation through the Council's Towards a Local Plan for Charnwood paper (2018) provide the Council's evidence for Draft Policy 19. The Study considered the Sileby-Cossington Area of Local Separation as ALS-D. However, the Study also considered the 'purpose' of ALS-D and concluded it to be Moderate - provides the gap between Sileby and Cossington, preventing further ribbon development along Cossington Road and ensuring that the integrity of the gap is maintained. (p.43). The Study recommended that the "Designation [be] retained and extended to strengthen boundaries to the south-west. This change would also enhance the integrity and logic of the designation and ensure the narrow gap between Cossington and Sileby is not compromised." (p.86).	OFFICER RESPONSE Based upon the information in this response, the boundary edge of HS66 will be reviewed as part of the next draft of the local plan. The Council welcomes the opportunity to engage with Clarendon Land and Development Ltd to discuss the site and to consider the proposed amendments.
To re-iterate, we do not object to the principle of ALS4. However, it is our view that the boundary of allocation HS66 has been drawn without regard to defensible physical boundaries or coherent landscape features. We note that Council's assessment of the Area of Local Separation recommended an extension to ALS4 to the south west (which has been implemented for the proposed designation) but did not recommend an extension to the south/south-east beyond the brook and vegetation that provides the boundary of existing designation or the proposed ALS4. Whilst there may be a case to manage the periphery of any built development that takes places within the allocation that should	
ordinarily, be considered through a master plan approach which seeks to understand the relationship between the Area of Local Separation, the landscape features provided by the brook and in this case the brook and vegetation that provides the boundary of ALS4. The Draft Plan proposals map (p.128) shows that the boundary of the allocation has been drawn to not only leave designated countryside between the south-eastern boundary of ALS4 and the north western boundary of HS66 but to also provide for a buffer around the allocation (identified as Strategic Landscaping Open	
	 and an Addendum to that Report (May 2019) which considers comments made in response to an earlier round of consultation through the Council's Towards a Local Plan for Charnwood paper (2018) provide the Council's evidence for Draft Policy 19. The Study considered the Sileby-Cossington Area of Local Separation as ALS-D. However, the Study also considered the 'purpose' of ALS-D and concluded it to be Moderate - provides the gap between Sileby and Cossington, preventing further ribbon development along Cossington Road and ensuring that the integrity of the gap is maintained. (p.43). The Study recommended that the "Designation [be] retained and extended to strengthen boundaries to the south-west. This change would also enhance the integrity and logic of the designation and ensure the narrow gap between Cossington and Sileby is not compromised." (p.86). To re-iterate, we do not object to the principle of ALS4. However, it is our view that the boundary of allocation HS66 has been drawn without regard to defensible physical boundaries or coherent landscape features. We note that Council's assessment of the Area of Local Separation recommended an extension to ALS4 to the south west (which has been implemented for the proposed designation) but did not recommend an extension to the south-south-east beyond the brook and vegetation that provides the boundary of existing designation or the proposed ALS4. Whilst there may be a case to manage the periphery of any built development that takes places within the allocation that should, ordinarily, be considered through a master plan approach which seeks to understand the relationship between the Area of Local Separation has been drawn to not only leave designated countryside between the south-eastern boundary of ALS4.

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	between the north east of the HS66 boundary and the field boundary and also to the south west of the HS66 boundary and Humble Lane with the buffer also extending around these sides of the allocation (see Appendix A).	
	Neither the commentary in the Area of Local Separation Study or the Draft Local Plan reasoned justification explain the rationale for drafting the HS66 allocation boundary in this way. The Area of Separation Study was clear that ALS-D (what has become ALS4 in the plan) should not be extended further south/south-east. The Draft Policy LP3 text is clear that development should clearly maintain the physical separation between the built up areas of these settlements. Draft Policy LP3 recognises only the Charnwood Forest Regional Park as an area that it deserves mention as an area for particular protection. The use of a buffer within the allocation in relation to the Area of Separation is understandable but why there would then be a 'stand-off' area of designated open countryside in addition is not clear, particularly in the absence of evidence to justify that decision. The effect of the above will be to contrive a buffer of strategic landscaping together with a narrow gap of land with no economic purpose which together could result in an awkward relationship in a sensitive area where the transition from Sileby, through the ALS and beyond the brook to Cossington will, as a result, lack coherence.	
	An indicative layout has been prepared for Clarendon Land Ltd and is attached at Appendix B. The layout appropriately respects the area shown for built development by the proposed allocation boundary for HS66 and manages the landscape buffer through the provision of new strategic green infrastructure so it is coherent in its relationship with the brook and the boundary of ALS4 (to the north west), the field boundary (to the north east) and to Humble Lane (to the south). The layout responds appropriately to the area's sensitive context of the linear village and its landscape setting as required by Draft Policy LP3.	
	To clarify, the residential area that results from this is consistent with the extent of the allocation shown for HS66 on the draft proposals map in its relationship with ALS4, the field boundary to the north east and Humble Lane. However, the landscape buffer is slightly more extensive in the north west than the Strategic	

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	REPRESENTATION SUMMARY Landscape Open Space shown on the proposals map which allows for positive planning for the relationship with the brook and the use of this part of the site as multifunctional green infrastructure. This would comprise new planting and habitat creation to provide biodiversity benefits and new accessible green space for recreational pursuits. The landscape area to the north east and south west is consistent with the Strategic Landscape Open Space shown on the proposals map. CONCLUSION The Draft Plan appropriately seeks to protect settlement identity including through the designation of Areas of Local Separation and designation of the land between Sileby and Cossington as Area of Local Separation 4 is supported in principle. The only matters between the Council and our client relates to the boundary of the allocated site at allocation HS66 Land rear of Derry's Garden Centre and the Area of Local Separation (ALS9) in respect of the arrangements for Strategic Landscaping and the development yield for the site at 70 homes which we do not consider would make effective use of the allocation. The Charnwood Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Study (2016) and an Addendum to that Report (May 2019) which considers comments made in response to an earlier round of consultation through the Council's Towards a Local Separation in two parts: ALS-J (land north of the A607 and north, west of south-west of Queniborough)	OFFICER RESPONSE Noted - the extent of the AoLS has been drafted based on the technical evidence prepared to inform the local plan. Based upon the information in this response, the boundary edge of HS72 will be reviewed as part of the next draft of the local plan. The Council welcomes the opportunity to engage with Hallam Land Management Ltd to discuss the site and to consider the proposed amendments.
	The allocated site lies within ALS-J. However, the separation between East Goscote and Queniborough is defined by land in both ALS-I and ALS-J.	
	The Study noted the northern parcel (reference ALS-I) to be strongly bounded by the Queniborough Brook to the north, the A607 to the south, Melton Road to the east and the Melton- Leicester railway line to the west. In considering alternative boundaries it found that "as the AoLS is already strongly defined,	
	boundaries it found that as the AOLO is already strongly defined,	

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	and no Zones of Weakness or Extension Opportunity	
	Areas are identified, no change is proposed" (p.72). However, the Study also considered the 'purpose' of the ALS-I and concluded it to be Moderate - forms part of an important physical gap between Queniborough and East Goscote, playing a role in preventing their coalescence (p.45) The Study recommended retaining the designation with no amendments (p.87).	
	ALS-J presents a different prospect for Queniborough in that the tract of land assessed is extensive and covers land to the north, west and southeastern side of the settlement. The Study noted that the "AoLS predominantly strongly bounded by defensible features, consisting of roads, railway lines, established hedgerows along field boundaries and well defined settlement edges. However, the boundary of the AoLS to the east of Melton Road and north of the A607 is weakly defined and does not appear to follow any readily recognisable features". In considering alternative boundaries it found that "In the north-east of the AoLS, the boundary should be realigned with the prominent settlement edge of East Goscote, Melton Road and the edge of a wooded plantation. In the west, at the edge of Syston, the boundary should be amended to reflect the two outstanding residential planning permissions. It is suggested that the boundary is aligned with a mixture of robust planted buffers at the edge of the Queniborough Lodge site and, south of Melton Road, well defined property edges and, subject to possible further refinement, the edge of the residential application site" (p.73). The Study also considered the 'purpose' of ALS-J and found it to be Strong - provides the essential gaps between East Goscote, Queniborough and Syston, restricting development which would lead to the merging of these settlements are visually and functionally separate, with unique characteristics (p.45). The Study recommended that the designation partially retained with boundary amendments to exclude two Zones of Weakness in the west at the edge of Syston and incorporate an Extension Opportunity Area in the north-east at the edge of East Goscote (p.87). The "Proximity of Neighbourhoods" for the Areas of Local Separation has also been considered (Annex A of the 2016 Study. In respect of ALS-J it concluded that:	
	"The gap between Queniborough and East Goscote is physically very narrow (around 400m at its most narrow), it feels like a much	
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	more substantial break as a result of the physical and visual severance created by the A607, as well as the stronger functional and landscape relationship between this area and the wider countryside" (p124- 125).	
	It goes on to say that "The A607, which has a dense planting buffer and elevated position for much of its length, increases the perceived distance between Queniborough and East Goscote". We agree with this assessment and having examined the landscape note a clear physical and perceptual separation between Queniborough and East Goscote provided by the embanked and tree lined corridor of the A607, that gently rises above and between the two settlements, and by established vegetation of mature trees along Queniborough Brook.	
	Built development on the HS72 and indeed within the landscape up to a point commensurate with the northern extent of New Zealand Lane would not undermine the function or the integrity of the Area of Local Separation policy. There is significant separation between Queniborough and East Goscote and, in fact, development through a master plan approach will provide an opportunity to strengthen this separation and preserve "settlement identity"; for example, through design approaches such as new woodland planting and increased tree cover. This would also be consistent with the specific guidelines for development in this landscape as set out in the Council's 2019 Landscape Sensitivity Assessment (p.106) which states that any future development within the area should "increase tree cover at the settlement edges to enhance the well wooded character of Queniborough village and self-contained character of the Wreake Valley". This is in accordance with the Council's Landscape Character Assessment (2012), and in particular, the specific landscape guidelines for the 'Wreake Valley Character Area' which includes: "Enhance the Wreake Valley landscape character around the fringes of the existing larger settlements by increasing tree cover".	
	To re-iterate, we do not object to the principle of ALS9. However, it is our view that the assessment of ALS-J has considered too large an area and that a more granular assessment is required. It is our view that for the land closely associated with the north of HS72 and to the east of New Zealand Lane that a more granular, detailed	

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	assessment would have: recognised the areas of ALS-J with a strong purpose being to the north of the A607 Melton Road roundabout and the southern areas of land associated with Syston; recognised the parcels adjacent to the eastern part of New Zealand Lane as Moderate at best and certainly not Strong; recognised the ability in which to create a better relationship between the built form at New Zealand Lane and Melton Road through new development, which can be designed so that it does not extend the settlement any further north than the current built edge of Queniborough at New Zealand Lane; recognised that development provides an opportunity in which to strengthen the strong sense of separation that already exists by providing green infrastructure to include woodland planting around the site's northern and eastern boundaries, reinforcing the existing containment and separation created by the embanked A607 and tree cover within this landscape; and concluded that the gap between Queniborough and East Goscote could be respected by an alternative boundary that maintains the separation. It is important to recognise that the Council's assessment of the character for ALS-J is heavily influenced by the greater part that lies between Queniborough and Syston to the south. Any development to ubund any further north than the current built edge at New Zealand Lane (within ALS-J) will have no impact upon the gap between Queniborough and Syston., Built development would not extend any further north than the current built edge at New Zealand Lane and would effectively be hidden by the existing built up area. Woodland planting and increased tree cover incorporated around the development's northern and separation between Queniborough and East Goscote, providing long term benefits. Put simply, the expanse of land associated with the wider ALS designation can still fulfil its function without the need to retain the land previously promoted by Hallam Land Management (P/18/0611/2) from development (see Appendix A – Development Fr	
	The Draft Plan appropriately seeks to protect settlement identity	

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EDCLP/99 Marrons on behalf of Nottingham Community Housing Association (NCHA)	 including through the designation of Areas of Local Separation and designation of the land between Queniborough and East Goscote as Area of Local Separation 9 is supported in principle. The only matter between the Council and our client relates to the boundary of the allocated site at allocation HS72 Threeways Farm and the Area of Local Separation (ALS9). In our view the boundaries should be modified through an amended boundary which would reinforce the built form and not materially impact the Area of Separation. LAND AT HOMEFIELD ROAD, SILEBY The site is located on the western edge of Sileby and accessed from Homefield Road which in turn provides access to Seagrave Road and the Sileby local centre to the south east. The site is immediately adjacent to residential development to the north, Redlands primary school to the east and a railway cutting to the south and as such sits within a small pocket of countryside which penetrates this part of Sileby and in the Countryside on the Draft Plan Policies Map. Although the land falls away to the north-west and south-east, giving this part of Sileby an elevated feel, site levels are consistent with existing development to the north and there are no landscape designations. The site is identified on the Draft Plan Policies Map as part of an area of local separation (ALS5 - Sileby/Barrow upon Soar). The western edge of the site falls within the proposed Area of local Separation ALS5 - Sileby/Barrow on Soar under Draft Policy LP19. The western edge of the site falls within the proposed Area of local Separation ALS5 - Sileby/Barrow on Soar under Draft Policy LP19. The site is within the scar Valley Character Area as defined by the Charnwood Landscape Character Assessment (2012). The report concludes that the strength of this landscape character Area is "moderate". The assessment notes that the Soar Valley "is the most urbanised area of Charnwood Borough, with Loughborough in the north, 	Noted – the extent of the AoLS has been drafted based on the technical evidence prepared to inform the local plan. The Council acknowledges the submission of the alternative site at Homefield Road, Sileby. The detailed information in this response, and the site itself will be assessed as part of preparing the next draft of the local plan. The Council welcomes the opportunity to engage with Nottingham Community Housing Association to discuss the site.
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	substantial settlements to both east and west sides of the river corridor, and the influence of Leicester City to the south". The report states that "villages are large and stretch along the higher ground either side of the valley". Sileby, like many of the other villages, occupies the valley slopes above the lower lying floodplain of the river Soar. The existing built- up area of Sileby, adjacent to the site, is a typical case in point. Housing at Park Road and Homefield Road extends on the valley slopes between 60-85 AOD (Above Ordnance Datum). The site occupies land at 60m AOD, which would mean that new housing upon it would occupy a similar landform as the existing housing. The report notes that "Any new built form on the valley slopes should be assimilated into its surroundings by careful scale, layout, siting, and design, and the use of materials and associated landscaping". Design and mitigation measures can be developed to ensure that new housing is sensitively assimilated into the landscape and the built context within which the site is located. This can include, for example, the introduction of new woodland planting around the site perimeter to 'soften' and filter views of built development, and an appropriate design response with regards to layout, scale and materials.	
	As previously noted the site is identified on the Draft Plan Policies Map as part of an area of local separation (Sileby/Barrow upon Soar (ALS5)). The Draft Plan indicates that their main purpose is preserving settlement identity, and they are based on landscape character, the visual appearance of the area and maintaining landscape connectivity. The Charnwood Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Study (2016) considered the Area of Local Separation as ALS-E. The Study also considered the 'purpose' of ALS-E and concluded it to be Moderate and recommended that extensions to the east and south be considered to ensure the wider integrity of the gap and strengthen its boundaries. The recommended boundary follows the backs of properties on Homefield Road and the field boundary further south. This results in the Area of Local Separation penetrating further east	
	than the rear of properties on Homefield Road.	

The surrounding landscape is not considered to be 'out of the ordinary' in landscape terms, being neither distinctive nor special in

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	 its character. The site, which is not publicly accessible and forms two grazing fields, lies within the context of adjacent housing and the railway to the south. Development on the site would be observed within that context and would not be an uncharacteristic feature in this landscape and, in this regard, does not offer a strong contribution to the separation between Barrow and Sileby. Suffice to say that at this stage we do not agree that the area of separation should extend so far to the east and in effect penetrate the area between the railway and the existing development to the north which forms a logical western extent of Sileby. The scheme proposed is consistent with the existing settlement edge provided by Homefield Road and does not penetrate into the countryside further west than that built form. In our view, the site has the capacity to absorb well-designed and wellplanned development through a master planning process which considers the layout, scale and design response to the landscape. 	
EDCLP/108 Sue Barry	Not leaving big enough space villages becoming joined together. Encouraging more flooding when losing open spaces Yes to more parks, biodiversity, wildlife areas to be left, open countryside spaces, flood plains. More tree / hedgerow planting. create more National Forest areas for people to care for and visit.	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority.
EDCLP/121 Marie Birkinshaw	Actively promote and invest in walking and cycling opportunities (health and wildlife benefits are key) The information given in the Environment chapter of the Plan is of absolute key importance to all the housing and development plans given earlier (as this section states). Is there any way that this section could appear earlier to set the Environmental context which this chapter so rightly states is of vital importance.	 Draft Policy LP19 is primarily focussed on protecting and enhancing the natural environment and its assets. However, the Council acknowledges the relationship between access to the natural environment, and health and well-being. This response will help share revisions to the policy, including making stronger cross-references to inter-linked policy areas.
EDCLP/122 James Singer	fThe Green Space around Loughborough seems, in general terms, to be radically eroded in the Draft Local Plan to an alarming extent. Is the degree of erosion in line with Government Guidelines or does it exceed these?	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority.
EDCLP/125 Tim Birkinshaw	Green wedges perform an important function and should be protected and retained. Large-scale building (as HS35, HS36) should not be allowed. Developments in Green Wedges should be very exceptional and only small scale.	Noted - the Draft Policy LP19 has been drafted to protect and enhance the landscape, countryside, Green Wedges, and Areas of Local Separation; an objective the Council has identified as a high priority.
EDCLP/126 Silver Fox Development	We are supportive of developments which lead to wider improvements to quality, quantity and accessibility of public open space.	Noted – the extent of each ALS has been determined based upon the evidence that supported the draft local plan.

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Consultancy on behalf of Mr. Tony Shuttlewood	Areas of Separation should be the minimum required to enable the objectives of the policy to be achieved.	Draft Local Policy 19 is clear that the extent of each ALS will be protected, and new development will be subject to the clause requiring the physical separation between the built up area of the relevant settlements.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We agree broadly agree but question the wording of the first bullet point. By definition, new development in the countryside cannot protect landscape character. We suggest rewording as follows: <i>'requiring new development to respect and preserve landscape</i> <i>character and etc'</i> However we consider that development within Areas of Separation and Green Wedges should be restricted to recreational activities not requiring built infrastructure. There needs to be precise guidance regarding acceptable development or otherwise in these areas.	Noted – Draft Policy LP19 has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority. The proposed revised wording will be considered as part of the next draft of the local plan.
	Another CPRE concern is the lack of national designations to protect the countryside of both Leicestershire and Charnwood. There are no Green Belts, National Parks or ANOBs in the county and within Charnwood only a number of SSSIs and relatively small National Nature Reserves are protected. Accordingly CPRE consider that the Local Plan should emphasise policies which enhance protection of the countryside, biodiversity and green spaces.	
EDCLP/152 Adam Murray	Finally, in respect of Draft Policy LP19: Landscape, Countryside, Green Wedges and Areas of Local Separation, we object to the	Noted – the proposed extent of the AoLS have been defined based on the technical evidence, plus addenda.
Andrew Granger & Co Ltd obo landowner clients	proposed designation of our client's land as an Area of Local Separation. Paragraph 7.13 of the Draft Plan identifies that the main purpose of Areas of Local Separation is 'preserving settlement identified; and they are based on landscape character, the visual appearance of the area and maintaining landscape connectivity'. Similar to the Limits to Development, it is our view that Rothley Brook provides a more permanent, defensible boundary upon which to base the designation. Rothley Brook provides a natural barrier to development to the west of Thurcaston and appropriate reflects the extent to which existing properties and planning approvals have extended the village envelope to the west. As such, we propose the removal of our client's land to the west of Anstey Lane from the Thurcaston/Cropston/Rothley Area of Local Separation.	The information in this response will be used to review the policy and Policies Map and inform the next draft of the local plan.
EDCLP/157	The Parish Council very strongly supports the Local Plan policies	Noted – support is welcomed.
Lorraine Davies	as drafted in connection with: 933	

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Mountsorrel Parish Council EDCLP/163 Liz Hawkes	 * Countryside and Landscape * Charnwood Forest and National Forest * River Soar and Grand Union Canal Corridor * Biodiversity and Geodiversity * Tree Planting * Heritage * Healthy Communities, Open Space, Sport and Recreation * Indoor Sports Facilities * Protection of Community Facilities and the very important provisions and priorities identified - which must be strictly applied in order to protect the Borough's environmental assets and the health and well-being of Charnwood's communities. The Parish Council particularly welcomes the introduction of the new policy on Tree Planting and trusts that the Borough Council will lead on this in a big way. APC strongly supports the proposals for, and the need for, areas of local separation (ALS). These are areas of open countryside with 	Noted – support is welcome.
Liz Hawkes Anstey Parish Council	 the purpose of preserving settlement identity. One such area is ALS13 between Anstey and Newtown Linford. Anstey PC also strongly supports the development and preservation of Green Wedges, specifically GW1 - Leicester (Beaumont Leys)/Birstall/Thurcaston/ Cropston/Anstey/Glenfield/Groby. The Parish Council would like to see an ALC between Anstey and Groby. Draft Policy LP 19 asks for relevant local Landscape Character Assessments (LCA) and Anstey PC request that the LCA drawn up for Anstey is considered for development with Anstey. Anstey Landscape Character Assessment 2014 is attached to this response. 	Draft Policy LP19 has been drafted on the basis of the latest evidence in the Landscape Character Assessments (June 2019). Anstey falls within Local Character Assessment Area 9 - Rothley Brook Lowland Farmland. For the avoidance of doubt, the character assessments are drawn up based on the type, nature, role and function of the various landscapes across the borough. As such, Anstey falls within the wider context of the Rothley Brook Lowland Farmland landscape.
EDCLP/165 Dr S.J.Bullman	 Point 7.8 says: "Countryside is defined in Draft Policy LP1" I struggled to find such in the presented Draft LP1, just a mistaken reference to Policies 18&19 (should have been 19 & 20). This is a self-referencing circle. Point 7.10 says: "Our proposed strategy and draft policy support our rural communities' needs for affordable housing, facilities and services" I don't think it does. See answer to Q9a 	Draft Policy LP1, under the 'Environment' sub-heading, states that the concept of 'Countryside' is a designation identified on the Policies Map. The Council acknowledges that the clarity of purpose between what is written in Draft Policy LP1, and what is subsequently written in Draft Policy LP19, and the spatial extent of the designations shown on the Policies Map, could be clearer. This representation will inform further revisions to the policies.
EDCLP/180	Draft Policy LP 19 sets out the Council's proposed approach	Draft Policy 19 should be read in conjunction with Draft Policy 1 and Draft
Alex Prowse	towards development proposals in the Countryside. In doing so, it	Policy 8 to gain the full policy framework for responding to proposals for

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Astill Planning Consultants obo Mr Fothergill	sets out the types of development that will be allowed in the Countryside. Given the growing demand for self-build and custom- build housing in the Borough, and the need for the Council to comply with the 'Duty to grant planning permission etc', it is suggested that Draft Policy LP 19 should be amended to allow small-scale opportunities for self- build and custom-build housing schemes to come forward on sites in the Countryside that are adjacent to the existing built form of settlements (including those without Limits to Development) where there is evidence that the demand for this type of housing is not being met. A justification for incorporating this approach into the new Local Plan is provided above in the response to Question 13.	self-build and custom-build. However, the Council will use the information in this response to review the policy wording and establish whether it is sufficient to give clear direction to those seeking to deliver self-build and custom-build.
EDCLP/187 Jim Smith	There would appear to be no planned separation between Sileby and Seagrave, despite these settlements having completely different characters.	The role, function and extent of the AoLS are based upon the Council's technical evidence base.
EDCLP/189 Alan Siviter Pegasus on behalf of Singh Family	My clients the Singh Family, the occupants of 380 Bradgate Road, Newtown Linford, LE6 0HA wish to object to the proposed Limits to Development around the settlement of Newtown Linford proposed in the Draft Charnwood Local Plan (2019 – 2036). The objection relates to draft policies LP1 and LP19. In summary, the Limits to Development need to be extended on the eastern edge of the village to incorporate the residential curtilage of 380 Bradgate Road, Newtown Linford. The dwelling is clearly located within the settlement of Newtown Linford and provides a clearly defined edge to the built form of the settlement. The dwelling is a gateway location into the settlement. Reference should be made to the 2016 Green Wedges and GI assessment by ARUP that includes the review of all Area of Local Separation (Annex A page 152). The summary contained within the document states: "Area of Local Separation M (ALS-M) lies between Anstey and Newtown Linford. The parcel is situated on the eastern edge of Newtown Linford and on the north-western edge of Anstey. Bradgate Road cuts across the centre of the area. Ribbon development along Bradgate Road adjoins the eastern and western boundaries. The area is bounded by countryside to the north and south."	The ALS and Limits of Development have been defined based upon the technical evidence that has been prepared to inform the local plan. The Council will review the extent of ALS13 and the limits to development at Newton Linford to ensure that there are no unintended errors. The detailed information in this response will be used to inform that review and will inform the next stage of the draft local plan.
	Following the recent review, the assessment confirms that 380 Bradgate Road is not located within the Area of Local Separation	

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	(specifically ALS13 Anstey to Newtown Linford) as it clearly does not offer the appropriate value to qualify, being an already developed parcel of land. Areas of Local Separation are areas of open countryside that separate two neighbouring settlements. Their main purpose is preserving settlement identity, and they are based on landscape character, the visual appearance of the area and maintaining landscape connectivity.	
	By not identifying the site as an Area of Local Separation it would suggest that ALS13 identifies 380 Bradgate Road as part of the settlement of Newtown Linford, and therefore should be incorporated into the limits to development for the settlement. It is unclear as to why the settlement boundary assessment contradicts the preceding evidence prepared by professional consultants on behalf of Charnwood Borough Council.	
	If the site is not an ALS but is located on the edge of the settlement, and is a developed property, why is it not included in the settlement boundary? It is considered that the findings of the recent settlement boundary assessment are misguided and contradicts the evidence base of Charnwood Borough Council.	
	Respectfully, it is requested that the Limits to Developments at Newtown Linford are re-evaluated and redrawn to incorporate 380 Bradgate Road as shown below in Figure 1, to be consistent with Policy ALS13 (Area of Local Separation).	
	If in the meantime you require any further information, please do not hesitate to contact me on the details listed below.	
	Figure 1 – Proposed Revision to the Newtown Linford Limits to Development [Image available]	
EDCLP/191 Stephen Harris Emery Planning on behalf of Hollins Strategic Land	Policy LP19 is a permissive policy in that it allows development in the Green Wedges provided all three criteria in the policy are met. It is necessary for Policy LP19 to have that flexibility and a restrictive designation upon land which is not necessary to be retained in its totality to maintain the strategic gaps between settlements would be contrary to the NPPF – particularly in relation to paragraph 78, which seeks to promote sustainable development	Noted – support is welcomed.
	by locating housing where it will enhance or maintain the vitality of rural communities. It is supported on that basis.	

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Guy LongleyFPegasus oboftDavidsonsT	We have set out above the potential for development at Groby Road, Anstey to be accommodated without impinging on the function of the wider Green Wedge between Anstey and Glenfrith. The Green Wedge shown on the Proposals Map should be amended to remove land to the south of Groby Road and include	The Council acknowledges the submission of the alternative development proposal at Groby Road, Anstey. This site will be assessed as part of the SHELAA. The site assessment and the information in this response will be used to
EDCLP/216ATom CollinsreNinteen47 oboirDavidsons &toRedrowp	hat land as an allocation on Draft Policy LP 3. As well as supporting developments which have a strong relationship with the operational requirements of land-based ndustries, this policy should also support developments which lead to wider improvements to the quality, quantity and accessibility of public open space, and can be successfully integrated into their andscape setting.	inform the next draft of the local plan. Noted – the overall policy framework set out in the draft local plan is flexible to support sustainable development, and allow acceptable development to protect and enhance the natural environment.
EDCLP/221 F Nick Baker th Lichfields on a behalf of CEG S T L V th g T C T T ir e G G t t S S T L V t t S S T L V t t S S T L V t t S S S T L V t t S S S T T L V t t S S S T T L S S S S S T T L S S S S S S	Andscape setting. Related to the proposed housing allocations within and adjacent to the Leicester Urban Area is the challenge of maintaining appropriate Areas of Local Separation and Green Wedges. CEG supports the identification in Draft Policy LP 19 of Areas of Local Separation (ALS) and Green Wedges (GW), including the Syston/ Thurmaston and Syston/Barkby Area of Local Separation and the Leicester Hamilton Green Wedge (GW3). We note that the Leicester Hamilton Green Wedge (GW3) reflects the extent of the area previously referred to as PGW-1 (potential green wedge), whilst the area of land between Syston and Thurmaston was previously referred to as Green Wedge 3 is now covered by an Area of Local Separation. These allocations help to identify important areas of green nfrastructure which are necessary to maintain the local environment and promote sustainable patterns of development. Given the quantum of development which has been permitted in his area of the Borough close to the Leicester Urban Area, CEG suggests that greater ALS and GW in this area should be maintained and the number of housing allocations in this location or delivery in the next plan period reduced. CEG is also concerned that the full extent of the Syston/ Thurmaston and Syston/Barkby ALS is difficult to identify on Policies Map 1. It is unclear for instance how the ALS relates to proposed housing site allocation 6 (HS6). CEG consider that the ALS should apply to this area and that this should be made clear in the next version of Policies Map 1.	Noted – support is welcomed. The extent of the AoLS are based on the technical evidence base prepared to inform the local plan. The Policies Map and the overall visibility of the AoLS will be reviewed prior to the next stage of the local plan being produced. Where additional clarity can be provided, it will be included in the next draft of the local plan.

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EDCLP/225	As a key stakeholder and delivery partner for Thorpebury, CEG would welcome the opportunity to discuss any of the matters raised above with the Council if its further input would support the plan preparation process and assist the delivery of this important strategic development. Please contact me or my colleague Nick Baker should you wish to discuss these representations. We welcome and applaud the recognition of the importance	Draft Policy LP22 sets out the Council's approach to conserving and
John Clarkson Leicestershire & Rutland Wildlife Trust	and character of the green infrastructure of the area, whether it be areas of separation or green wedges, and the policy objective to protect that character and beauty. However, the very nature of that character and beauty is created by	enhancing the natural environment, which includes protecting and enhancing biodiversity, habitats, and ecological networks. This response will be used to inform further reviews of the policy
	the biodiversity that occupies that space. We therefore request that there is a reference to ensuring high quality habitats within the green infrastructure, too	framework. Where appropriate, stronger links will be made between certain policies (e.g. LP19 and LP22). Draft Policy LP22 sets out the Council's approach to securing biodiversity
	Ensure that green wedges contribute to Nature Recovery Networks (some sort of habitat connectivity exercise would need to be done to establish the most valuable areas to focus habitat creation work or maintain as green space).	net gain. Protecting and enhancing geodiversity interests is a main component of Draft Policy LP22.
	New developments should only be permitted if they provide a net gain for biodiversity. Mitigation should be used to make existing high quality habitats bigger, better, more and joined. Has this plan complied with the NPPF which states in paragraph 174, that 'to protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'?	The Charnwood Forest is mentioned in Draft Policy LP20 and Draft Policy LP22. The Council notes the comment about the Soar and Wreake Living Landscape project. Reference to this project will be added to the reasoned justification where appropriate.
	7.3 – we do not think the value of the area for geology and wildlife is fully appreciated in this section. The geology of Charnwood Forest is of international importance and it contains a variety of wildlife habitats that are considered to be of national, regional and	

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	local importance. Semi-natural ancient woodland, pasture woodland, unimproved neutral grassland and marsh are the most valuable habitats.	
	7.6 Neither the Charnwood Forest or Soar and Wreake Living Landscape projects are mentioned. These are long-term, landscape-scale projects led by LRWT in areas chosen for their value to wildlife. The current biodiversity crisis is not mentioned, nor how to tackle it – development proposals should provide a net gain for biodiversity.	
EDCLP/226 Eleanor Hood	If you are allowing development in villages, there must be adequate public transport provided too, otherwise you are encouraging more	Noted – Draft Policy 33 set out the Council's policy approach for improving the delivery of sustainable transport across the borough.
EDCLP/246 Andrew Collis Gladman Developments Ltd	car use. As drafted the policy conflicts with national planning policy. Paragraph 170 b) of the 2019 NPPF sets out that the intrinsic character and beauty of the countryside is to be <u>recognised</u> through policies and decision making. The policy diverts from this by setting out that development will be carefully managed to "protect" the intrinsic character and beauty of the countryside thereby applying a higher test. This is not justified and should be amended to apply the cited approach of the NPPF. Gladman consider that subsequent bullet points connected to this are sound provided this first change is made. The supporting text lists 16 Areas of Local Separation which under Policy LP19 will remain predominantly open and undeveloped in character with physical separation between built up areas maintained. Reference to the draft Policies Map shows that the Areas of Local Separation identified cover extensive parts of the Borough, affecting some of the most sustainable locations of Charnwood.	 The Council considers that the wording in Draft Policy LP19 is in accordance with Paragraph 170 of the NPPF. The AoLS are long established policies and Draft Policy LP1 reiterates the role and function they continue to play in shaping the spatial pattern of development in the borough. As noted in Draft Policy Lp19, development in the AoLS is not prohibited. But, new development must clearly maintain the physical separation between the built up areas of the settlements. The information in this response will be used to review the extent of the AoLS, and will be used to inform the next draft of the local plan.
	Gladman is concerned that the approach taken by the Council to the designation of these areas amounts to a quasi-Green Belt policy placing a significant restriction on new development within the Borough. Examining the draft Policies Map, Gladman do not consider that the extent of Areas of Local Separation is justified considering the distance and character of the gaps between settlements which are sought by the policy to be protected. Connected to this, Gladman question the need for ASL6, ASL9, ASL13 in their entirety and consider that other policies including the Council's approach to areas outside settlement boundaries could	

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	afford adequate protection against inappropriate development in these areas. In line with comments submitted in response to Policy LP3 above, Gladman consider that ASL8 should be revised to exclude HS67 in its entirety.	
EDCLP/237 P.Williams	Generally speaking the whole document seems to be focused on how the environment looks and not enough on how it works in terms of carbon, water, energy and waste cycles and very little specificity on these issues throughout the document.	The role and function of the Green Wedges, and their purpose in shaping the intended spatial strategy for the borough, is set out in Draft Policy LP1.
	The Green Wedge policy doesn't actually say it will protect the open character of Green Wedges - only that it will support development that retains open and undeveloped character of the Green Wedge which seems somewhat internally contradictory.	
EDLCP/231 CBC Neighbourhoods and Community Well Being	We welcome Draft Policies LP 19 – LP28 which support the aims and objectives of the Council's adopted Open Space, Playing Pitch and Indoor Built Sports Facilities Strategies. The Chapter promotes the creation of a high quality and healthy local environment and the inclusion of specific Charnwood Forest/National Forest (LP 20), Biodiversity (LP 22) and Tree Planting (LP 23) Policies are welcomed and supported.	Noted – support is welcomed.
EDCLP/228 Haddon Way Residents Association	We are pleased to see that Charnwood has recently reviewed the existing areas of local separation. We are pleased to see that they have identified areas to protect Loughborough from merging into Woodthorpe and Quorn and we welcome these areas in particular. However, it appears that although an area of separation has been	As is set out in Draft Policy LP19, development is not excluded from the AoLS. But, the open and undeveloped character of the AoLS will be protected unless new development clearly maintains the physical separation between the built up areas of settlements.
	identified, according to the Policies Map 1 part of site HS35 sits within this area of separation. We question why an area of development is being suggested in an area that has been identified as an area to separate Loughborough and Woodthorpe from Quorn. We urge the council to reconsider this particular allocation.	
EDCLP/203 Leicestershire and Rutland Bridleways Association	Q24 LP19. Green Wedges. Public access to Green Wedges, green corridors etc. should not be only on foot or bicycle. It should be for ALL the 'non-motorised', otherwise known as Vulnerable Road Users (VRUs). Signage and path furniture should not deter such users; good design can indicate "motors not wanted here".	Agreed – access should be inclusive and open to all non-motorised users.
EDCLP/192 Severn Trent Water	Policy LP19 Landscaping, Countryside, Green Wedges and Areas of Local Separation, identifies the need to protect the landscape and natural settlement boundaries from development, Severn Trent would not raise any objection to these principles, but would note	Noted – development proposals would only be acceptable if they are in accordance with the policies in the local plan. Where infrastructure is shown to be needed, it would be required to mitigate its impacts.

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	that policy wording should not be so restrictive that it would prevent the development of flood alleviation schemes within these areas. This is because the development of green flood alleviation schemes or traditional flood alleviation schemes are unlikely to have any significant impact on the appearance of the local area, and could introduce new areas for amenity and biodiversity. Para 7.15 I welcome the proposed AoLS as shown on the interactive map. I would like to ensure that we protect the historic views and vistas of this area, to ensure that the land known as PSH300 and PSH377 in the preferred options document are included in the areas of separation. I would like that all paddocks / fields / Cricket pitches to the rear of the present houses on Wellsic Lane Rothley to Rothley Court are included in these areas of separation and the land off Westfield lane to the Primrose Hill Estate now in Mountsorrel. I would like to ensure the protection of Rothley Park and its historic assets and views.	The spatial extent of the AoLS is defined based upon the technical evidence base prepared to inform the local plan.
	I agree with the comments made by the inspector of the Core Strategy stating There are commitments for around 3,500 homes in the Service Centres. This is sufficient to meet the levels of planned provision and we only expect to see small scale windfall developments within the settlement boundaries between 2014 and 2028. (4.45, Charnwood Local Plan 2011 - 2028 Core Strategy Adopted November 2015) – I believe all remaining areas around Rothley should be protected and included as areas of separation.	
EDCLP/239 Jonathon Barratt- Peacock	I support ALS3 and ALS 15 as shown on the Policies Map. ALS 3 is essential to protect the historic Grade 1 listed Rothley Court and its parkland and the far reaching open views which form an essential part of the Rothley Ridgeway Conservation Area. Local Plan Policies CT4 and CT5 previously provided specific protection this area so we are pleased that you are continuing to safeguard this area from inappropriate development. We would like the wording from CT5 to be included in the new Local Plan as we do not consider that the protection of the general countryside policy of the Core Strategy are sufficient.	Noted – the Council has defined the AoLS based upon the evidence base prepared to inform the draft local plan. Protecting and enhancing the natural environment is a main priority of the local plan, and Draft Policy LP19 and Draft Policy LP22 provide a series of measures to protect and enhance the environment.
	ALS15 is essential to minimise the huge impact that the very large development at Broadnook will have on existing residents of Rothley and Thurcaston and the setting of Rothley Court.	

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EDCLP/239 Vivienne Barratt- Peacock	I support ALS3 and ALS 15 as shown on the Policies Map. ALS 3 is essential to protect the historic Grade 1 listed Rothley Court and its parkland and the far reaching open views which form an essential part of the Rothley Ridgeway Conservation Area. Local Plan Policies CT4 and CT5 previously provided specific protection this area so we are pleased that you are continuing to safeguard this area from inappropriate development. We would like the wording from CT5 to be included in the new Local Plan as we do not consider that the protection of the general countryside policy of the Core Strategy are sufficient. ALS15 is essential to minimise the huge impact that the very large development at Broadnook will have on existing residents of Rothley and Thurcaston and the setting of Rothley Court.	Noted – the Council has defined the AoLS based upon the evidence base prepared to inform the draft local plan. Protecting and enhancing the natural environment is a main priority of the local plan, and Draft Policy LP19 and Draft Policy LP22 provide a series of measures to protect and enhance the environment.
EDCLP/193 Richard Webb	I would like to see greater protection for green space and areas of local separation. Mandating and wording against any development except as a last resort.	Noted – the AoLS are defined based upon the evidence base prepared on this issue.
EDCLP/204 Guy Longley Pegasu s obo Davidsons Development Ltd (Rothley)	The proposed Area of Local Separation between Birstall and Rothley should be amended to remove land south of Brookfield Road from the designation. The land south of Brookfield Road, including land within Rothley C of E School grounds, does not form part of the wider area of separation between Rothley and Birstall. We are proposing that the land at Brookfield Road should be allocated under Draft Policy LP 3 to provide for an extension to the school along with additional housing. The development would not impact on the wider Area of Separation which should be amended to allow for the proposed development.	The AoLS are defined based upon the evidence base prepared on this issue.The AoLS between Birstall and Rothley will be reviewed to ensure that there are no errors and to aid interpretation.The submission of the alternative housing site is noted, and this will be considered through the site assessment process, via the SHELAA.
DCLP 265 Silver Fox obo Ms J & Ms A Kimber	We are supportive of developments which lead to wider improvements to quality, quantity and accessibility of public open space. 2.9.2 Areas of Separation should be the minimum required to enable the objectives of the policy to be achieved.	The AoLS are defined based upon the evidence base prepared on this issue. The policy framework aims to facilitate the wider objectives of the local plan, and to meet objectively assessed needs.
DCLP 266 Leicester City Council	City Council have set out response to Green Wedge designations as part of Appendix A to their representation. The City Council would welcome clarification within this draft Policy	The Council acknowledges the submission of the additional information regarding the cemetery proposal. The Council is working directly with LCC to reach a conclusion on this

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or its supporting text that cemetery use is, in principle, on land designated as countryside, Green Wedge and areas of local separation.	matter. The sit and the proposal for the cemetery will be analysed through the site assessment process via the SHELAA.
Question 24 - The recognition both of the importance of enhancing and protecting our environment and local biodiversity, as well as the need to keep the distinct character of our countryside and villages is extremely important and in this context I highlight the importance of 7.12	Noted – the Council agrees that the protecting and enhancement of the natural environment is a main priority.
Landscape, Countryside, Green Wedges and Areas of Separation This policy deals with a number of issues but it is not clear where the various parts of the policy apply and so whether there is any	Noted – the spatial definition of the policy requirements is intended to be set out in the Policies Map.
potential for overlap. Whilst Policy LP1 indicates that these areas will be identified on the	The Council will review the policy wording to make sure there is no potential for confusion or misinterpretation.
Policies Map, it is suggested that these areas are defined in words within either Policy LP1 or LP19. This is because the Policies Map	
The following Areas of Local Separation are material to draft	The additional information submitted in relation to HS6 is noted.
Syston/Thurmaston (ALS11) Syston/Barkby (ALS12)	The Council will use this information as an input into further site assessment work, and to assist in the preparation of the next draft of the local plan.
The Opportunities and Constraint Plan submitted in support of these representations demonstrate how this draft allocation could be brought forward broadly in line with the AoLS set out above. However, there are minor discrepancies, most notably in the site's	
north eastern comer. The potential developable area illustrated on the Constraints and Opportunities Plan does, however, ensure that separation is maintained between Syston, Thurmaston and Barkby and has been designed to reason to Level Landscope Character	
Assessments; and re-inforce landscape character and local distinctiveness. The submitted Landscape and Visual Assessment provides further details.	
The Rothley Brook Green Wedge (Charnwood plan designation GW1) falls within both Hinckley and Bosworth and Charnwood (and	Noted – support is welcomed – the Council would appreciate the opportunity for further engagement with Hinckley and Bosworth on cross-
also the administrative areas of Blaby and Leicester). Since Green	boundary issues, such as the role and function of Green Wedges and Areas of Local Separation.
Plan in 1987 they have remained an important policy tool guiding development across the HMA. Hinckley and Bosworth Borough	
prevent the merging of settlements, to guide development form, to	
	or its supporting text that cemetery use is, in principle, on land designated as countryside, Green Wedge and areas of local separation. Question 24 - The recognition both of the importance of enhancing and protecting our environment and local biodiversity, as well as the need to keep the distinct character of our countryside and villages is extremely important and in this context I highlight the importance of 7.12 Landscape, Countryside, Green Wedges and Areas of Separation This policy deals with a number of issues but it is not clear where the various parts of the policy apply and so whether there is any potential for overlap. Whilst Policy LP1 indicates that these areas will be identified on the Policies Map, it is suggested that these areas are defined in words within either Policy LP1 or LP19. This is because the Policies Map is not defined as a Development Plan Document. The following Areas of Local Separation are material to draft allocation HS6: • Syston/Thurmaston (ALS11) • Syston/Barkby (ALS12) The Opportunities and Constraint Plan submitted in support of these representations demonstrate how this draft allocation could be brought forward broadly in line with the AoLS set out above. However, there are minor discrepancies, most notably in the site's north eastern comer. The potential developable area illustrated on the Constraints and Opportunities Plan does, however, ensure that separation is maintained between Syston, Thurmaston and Barkby and has been designed to respond to Local Landscape Character Assessments; and re-inforce landscape character and local distinctiveness. The submitted Landscape and Visual Assessment provides further details. The Rothley Brook Green Wedge (Charnwood plan designation GW1) falls within both Hinckley and Bosworth and Charnwood (and also the administrative areas of Blaby and Leicester). Since Green Wedge policies were introduced in the Leicestershire Structure Plan in 1987 they have remained an important policy tool guiding development across the HMA. Hinckley and Bosw

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	resource. The Borough supports policy LP19 and the designation of green wedges in Charnwood Borough, in particular GW1.	
EDCLP/252 Leicestershire County Council	ADD Protecting landscape character and biodiversity	Protecting landscape character is a main component of Draft Policy LP19.
EDCLP/252 Leicestershire County Council	Further to comment on the intrinsic value of the environment and natural capital LP19 does not include ref to this and instead pics out the intrinsic character and beauty of the countryside – which is not the same thing. This needs to be addressed	Biodiversity issues are set out within Draft Policy LP22. Aspects of intrinsic value and natural capital are captured in Draft Policy LP22.
EDCLP/252 Leicestershire County Council	It would be helpful if the final version of Policy LP19 made clear that it would be acceptable for essential infrastructure (including for transport) to be provided across green wedges and areas of	Noted – the acceptability of development proposals will be considered via a number of policies, including Draft Policy LP1.
	separation where necessary to facilitate the development. An example where this might apply is the proposed allocation site HS5.	Development would need to accord with the policies in the plan in order to be acceptable.
EDCLP/252 Leicestershire County Council Strategic Land	Environment Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	Noted – support is welcomed.
EDCLP/272 Centre for Sustainable Energy via Cllr Needham	Policy LP19 appears to support "small scale new build development" in the open countryside without any restriction on the uses that would be supported. This seems to conflict with policy LP1 and raises concerns about the potential for unsustainable, car dependent patterns of development.	The Council does not consider that Draft Policy LP19 is in conflict with Draft Policy LP1; or policies aimed at facilitating rural development (e.g. Draft Policy LP5).
• • • • • •	Supporting development for the reuse and adaptation of rural buildings and small scale new built development adverse environmental effects; rnwood Forest and the National Forest comments on this draft policy?	
	with the proposed policy please set out why and what alternative	approach would you suggest?

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Do you think we	have missed something?	
DCLP/108 Mr Dennis Marchant	The policy is supported.	Support is noted.
DCLP/290 Natural England	Natural England welcomes this policy.	Support is noted.
DCLP/367 Mr John Barton	Places need to be accessible for off-road cycle ways as well as plenty of places for a day out and a nice cup of tea.	The policy supports sustainable small scale tourism proposals while the Local Plan's sustainable transport policy will encourage developments to make provision for cycling routes.
LDCLP/02 Anonymous	Priorities should be more footpaths that are regularly managed and more cycle routes in the countryside Reference to public rights of way and local areas of nature is needed.	The Borough Council will work with partners to promote the use of Charnwood Forest in a sustainable way. The policy specifically references a network of public rights of way. Other policy guidance on the issues is included elsewhere in the plan.
LDCLP/15 Anonymous	Not sure you are supporting Charnwood forest by building houses on its edges/inside its boundary, and does this support the plans for Charnwood regional park and its investment in the area?	The process for selecting sites for housing has had regard to a wide range of sustainability considerations. The policy seeks to protect and enhance the distinctiveness of Charnwood Forest.
LDCLP/22 Anonymous	The Charnwood and National Forest should be developed as much as possible with areas opened for public access.	The Borough Council will work with partners to promote the use of Charnwood Forest in a sustainable way. The policy specifically references a network of public rights of way while policy guidance on the other issues is included elsewhere in the plan.
LDCLP/34 Anonymous	The matter of the National Forest needs more attention to detail. The matter of thinning out as the trees grow needs to be a systematic process to ensure sustained timber crops and regulated growth of individual trees.	The policy makes clear its support for the woodland economy. The policy does not seek to set out guidance on detailed issues of forestry management but this matter is referred to elsewhere in the local plan, specifically in the policy on tree planting.
LDCLP/51 Anonymous	The whole of the area should be made as an SSSI site.	It is not the responsibility of the Borough Council to designate a Site of Special Scientific Interest (SSSI). Natural England will select and notify an area as a new SSSI when it
EDCLP/74	Concerns are expressed about the priorities of the plan which do	believes the land's wildlife, geology or landform is of special interest. The plan's policies also seek to conserve and enhance biodiversity and geodiversity with specific reference to Charnwood Forest.
Mr Hussain	not sufficiently prioritise the provision of decent modern homes for all sections of the population, particularly the most deprived sections of the population. The single most important issue for the whole of the borough should be housing	The issues raised relate to the overall strategy and priorities of the Local Plan rather than Charnwood Forest.

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	Concerns are raised about the priority given to protecting heritage features and promoting tourism when some people have no home to live in or are living in overcrowded situations with stress and anxiety. It is stated that Charnwood Forest is always going to be important to the people of Charnwood but the people of Charnwood need homes before they can enjoy the benefits of walking around our forest areas.	The plan needs to set out policies for the full range of issues. We make provision for homes elsewhere in the plan. We do not agree that our policy for Charnwood Forest in any way conflicts with our policies for housing.
EDCLP/101 Tim Jarram	I agree with the policies. Please implement them, but bear in mind the following [see Q8 HS33 and HS34] and remove sites HS33 and HS34 from the Local Plan.	Comment is noted.
EDCLP/108 Sue Barry	Keep extending forest areas and create new ones	Comment is noted. Reference should also be made to the local plan's positive policy for tree planting.
EDCLP/121 Marie Birkinshaw	Ensure good public access without cars especially to Charnwood Forest from Loughborough.	The policy for Charnwood Forest needs to be read in conjunction with other policies in the plan such as the policy for sustainable transport.
EDCLP/125 Tim Birkinshaw	Securing an improved network of public rights of way in the Forest is important, especially for walking and cycling.	Comment is noted. While the policy includes reference to an improved network of public rights of way it is also important to note that other policies in the plan positively promote sustainable transport.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We agree that the importance of Charnwood Forest must be recognised and that visitor growth and access to the countryside needs to be managed in a way that protects its special and unique character. We agree with draft policy LP20. We note that the Landscape Partnership Scheme runs to 2025 and the current National Forest Strategy until 2024 while this Local Plan runs to 2036. The Plan needs to include some indication, at least in the commentary if not the policy itself, of the approach between 2025 and 2036.	Support for the policy is welcomed. The wording of the explanatory text will be reviewed to improve clarity where appropriate.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	The Parish Council very strongly supports the Local Plan policies as drafted in connection with Charnwood Forest and the National Forest	Support of Mountsorrel Parish Council for the policy on Charnwood Forest is welcomed.
	The very important provisions and priorities identified are supported	

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	and these must be strictly applied in order to protect the Borough's environmental assets and the health and well-being of Charnwood's communities. The Parish Council particularly welcomes the introduction of the new policy on tree planting and trusts that the Borough Council will lead on this in a big way.	
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	This policy should support developments which deliver improvements to Charnwood Forest and the National Forest.	The wording of the policy sets out the priorities for which will be supported.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	Reference should be made to the Charnwood Forest Living Landscape project which is a long-term, landscape-scale project led by LRWT. This area was chosen for the project due to its high value for wildlife and geology. This should perhaps be mentioned under 7.21 which describes The National Forest. Reference should also be made to the internationally important geology and lichens. The policy only mentions woodland but should also refer to geology and other habitats of importance. Proposals for development should also provide a net gain for biodiversity	The wording of the policy and supporting text will be reviewed to improve clarity where appropriate.
EDCLP/226 Eleanor Hood	You refer a lot to 'supporting', but nothing on 'insisting' or 'ensuring and hence the policy seems too weak.	Planning policy should be clear, positive, relevant and capable of being delivered as policies need to steer planning decision making. In this particular case the Borough Council would need to work in partnership with other partners to implement the policy so words such as 'insisting' or 'ensuring' would not be appropriate.
EDCLP/237 P.Williams	Why can't improved access be secured by means other than development? Should highlight opportunity for additional access through new tree planting.	Improved access can take place either by the local authority or private landowners but such schemes usually take place when another development takes place. The plan provides separate policy guidance on tree planting which applies to the Borough.
EDCLP/231 CBC Neighbourhoods and Community Well Being	In Para 7.20 a correction should be made to the effect that HLF money has been secured towards the development and submission of a stage 2 bid. Funding for a Landscape Partnership Scheme has not yet been secured as stated.	Paragraph 7.20 will be amended to incorporate this correction.
EDCLP/203 Leicestershire	Concerned that the policy does not include reference to the needs of resident equestrians and the significant potential for horse	Consideration will be given to the needs of equestrians in reviewing the plan.

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and Rutland Bridleways Association	 tourism. It is mentioned that guided rides in Charnwood Forest could be attractive to visitors, but there is no establishment offering this, nor a good network of bridleways/very quiet roads where this could be run. Encouragement of such an establishment, possibly near to the country parks, could be an element in the Plan. There is strong pressure on the 2 pairs of country parks – Beacon/Broombriggs and Bradgate/Swithland – from riders seeking off-road riding, however, there is no off-road link between them and a target for creating an off-road link between the two sets of parks would be helpful to walkers and cyclists as well as riders. Concern was also raised about traffic because the proximity of the M1 junction 22 and the narrow and verge-less roads in the Forest tend to be busy and high speed. Woodhouse parish has up to 38,000 vehicles per week using the Forest/Beacon road, mainly cars and vans as this is a non-HGV route and HGVs tend to slow down other traffic. Most of the roads in the Forest need behind-thehedge/wall routes beside them to take vulnerable road users out of the traffic. Even short disconnected lengths can be a welcome respite and could eventually grow into a proper alternative network. 	The local plan's policy on sustainable transport sets out policy priorities for walking, cycling and public transport. Comments on traffic are noted but Leicestershire County Council is the responsible authority for highway matters.
EDCLP/192 Severn Trent Water EDCLP/159	Severn Trent have no objection to the principle of protecting the Charnwood Forest and the National Forest as identified within Policy LP 20 Charnwood Forest and the National Forest. We are also generally supportive of the planting of trees as they can have a positive impact of flood risk, water quality and climate change, but we would note that trees should not be planted within close proximity of any underground sewers to prevent damage to the sewerage network. Development of sites HS33 and HS34 that border Burleigh Wood,	Support for the policy is welcomed and reference to tree planting is noted. Any development taking place at these two sites would need to have
C.Mulvaney	part of the Charnwood Forest hardly meets with the proposal LP20 to "protect and enhance distinctive Charnwood Forest landscape".	regard to the characteristics of the location and the surrounding landscape.
DCLP-425-470 Environment Agency	We have the following comments to make on paragraph 7.20: The Environment Agency supported the Regional Park and the Chronicles of Charnwood bid. We are proposing to work with the National Forest Company on a Chronicles of Charnwood NFM project within the overall bid with project delivery 2020-22.	Comments are welcome and will be taken into account in reviewing the wording of the plan.
EDCLP/253 Ann Irving	Overall, the plan appears to respect the integrity of the Borough, adjacent to some of the most special places in the region e.g. the National Forest, Charnwood Forest, and the aspiring Regional	Comments are welcomed. The Draft Policy on Charnwood Forest and the National Forest explicitly recognises the importance of protection and enhancement.

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	Park. This spatial context is part of the tourist attraction and in the face of the so-called housing crisis, it needs protection if the region is to avoid coalescing into another Birmingham.	Comments on traffic are noted but Leicestershire County Council is the responsible authority for highway matters.
	What makes Charnwood special is its open and green spaces and what keeps it so is modest growth in commuter and through traffic. Keeping the balance is challenging, but vital, otherwise the area character will change.	
EDCLP/253 Ann Irving	Green space and wedges seem to be jewels in Charnwood's crown. It is good to see that they will be protected. As a leader in local campaigning for speed reductions and road traffic incident	The Draft Policy on Charnwood Forest and the National Forest explicitly recognises the importance of protection and enhancement.
	reductions, I welcome the focus on improving the opportunities for walking, cycling, and horse riding, all of which can be dangerous activities on parish roads. The Regional Park has similar proposals. The challenge will be to find ways to do these things without introducing greater urbanisation e.g. the Regional Park idea is to increase verges in the countryside but this can urbanise it and destroy the flora and fauna on rural verges that make them so pleasant to travel along. So, road safety for vulnerable road users would seem to be worth including in the plan. Collisions on parish roads can quickly cause them to be completely blocked.	Comments on traffic are noted but Leicestershire County Council is the responsible authority for highway matters.
DCLP/260 National Forest Philip Metcalfe	Draft Policy LP 20 will need to be updated to reflect our emerging Vision. As set out above, we would welcome the opportunity to discuss this further in due course.	Additional wording will be considered to better reflect the importance of the issues raised.
	Notwithstanding the need for future changes, the following amendments are considered necessary at this time. The first bullet should require new tourism proposals to reflect the character of the National Forest and Charnwood Forest through their setting, design, materials, the provision of information and links to experience providers. Further guidance will be provided in the National Forest Company's Sustainable Tourist Accommodation Design Guide which will be launched Summer 2020.	
	The third bullet should also encourage improved access between all settlements and the surrounding natural environment.	
	An additional bullet should require all development that comes forward within the National Forest to enhance the emerging character of the Forest by adopting a National Forest-inspired	

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	character and provide a link to the NFC's Design Charter which explains how this can be achieved.	
EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst	Support is welcomed.
	promoting its leisure and economic potential.	
	r Soar and Grand Union Canal Corridor comments on this draft policy?	
	with the proposed policy please set out why and what alternative	e approach would you suggest?
	nave missed something?	
DCLP/97 Mr Dennis Marchant	The policy is supported.	Support is welcomed.
DCLP/286 Natural England	Natural England generally welcomes this policy but suggests that it should be viewed in the context of the wider Green Infrastructure network.	Support for the policy is welcomed. We acknowledge that the policy for the River Soar and Grand Union Canal needs to be seen as an important green infrastructure corridor. The plan's policies do however need to be considered together rather than in isolation and the plan includes other policies to this effect on biodiversity, tree planting and open spaces.
DCLP/323 Mr Phil Sheppard	Strongly support	Support for the policy is welcomed.
LDCLP/02 Anonymous	Need to manage it	Comment is noted.
LDCLP/34 Anonymous	Riverbanks and canal banks are a haven for wild flowers and wild creatures of all kinds. Every effort must be made in terms of protection and generation. Again, education is the key combined with understanding. Based on enthusiasm.	Comment is noted. The plan includes a separate policy for conserving and enhancing biodiversity
LDCLP/51 Anonymous	Plan for increased sea level and more rain run off. Do not do any more building on low lying land	Comment is noted. A strategic flood risk assessment has been commissioned which will inform the development of policy.
EDCLP/83 Berrys on behalf of Moss Solicitors	The Council's draft policy River Soar and Grand Union Canal Corridor (Draft Policy LP21) is wholly supported. The policy seeks to provide high quality walking and cycling links between the corridor and the borough's towns and villages (including Barrow upon Soar); protect and enhance the River Soar; to deliver hubs	Support for the policy is welcomed. We note the reference to sites at Barrow upon Soar and the reference to improved links as part of any development proposal.
	and tourist accommodation opportunities linked to the River Soar at Barrow upon Soar (amongst other settlements); and actively seeks opportunities to enhance the entire corridor.	
	Land at 83 ('Northfield') and 87 Cotes Road lies close to the	

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EDCLP/95	eastern bank of the River Soar as it flows through Barrow upon Soar. The site is well located to provide a walking and cycling link towards the eastern bank of the River Soar in accordance with the draft policy. The link will be designed to form an integral part of the wider link within the designated Corridor. The link will be well designed and incorporated into the wider development proposals for the site to provide walking and cycling opportunities between the centre of Barrow upon Soar and the wider countryside. The Parish Council is concerned that there is an element of	The legal plan's policies need to be read together and any form of conflict
Barrow Upon Soar Parish Council	duplication and conflict between Draft Policies LP 21 and LP 16 (Rural Economic Development) in relation to tourism development in the River Soar and Grand Union Canal Corridor.	The local plan's policies need to be read together and any form of conflict or unnecessary duplication in policy wording would not be appropriate. However, this does not apply with respect to the policies on rural economic development and the River Soar which are complementary.
	 Proctors Park is situated on land between Barrow upon Soar and Quorn and is accessed by a road into the site from Bridge Street. The site is bounded by the River Soar to the south and west and includes several lakes formed from disused gravel workings. Part of the land comprises Barrow Gravel Pits, a Site of Special Scientific Interest (SSSI). During the preparation of the Barrow upon Soar Neighbourhood Plan, many residents expressed concern about the appearance of the site. The Parish Council is keen to ensure that Draft Policy LP 16 support for tourism and leisure facilities is compatible with nature conservation interests and, in the case of Proctors Park takes opportunities to achieve net environmental gains such as habitat creation, landscaping or improve public access to the countryside. The Draft Charnwood Local Plan 2019-36 should take steps to ensure that Draft Policy LP 21 is aligned, or refers to Neighbourhood Plan Policy BuS2 	Reference to the local significance of Proctors Park is welcome. We will consider alignment and consistency with neighbourhood plans in reviewing the plan.
EDCLP/108 Sue Barry	Dredge rivers, concern re plastic pollution. Ongoing clean up to preserve wildlife and environment	Dredging, plastic pollution and cleaning up are all important management issues which affect the quality of the local environment.
EDCLP/121 Marie Birkinshaw	As above [Q24] – show convincing maps of biodiversity corridors and actively promote good stewardship with landowners who are linked to this and note its implications for farming and land use.	The need for graphical representation is noted and will be considered as part of the overall presentation of the plan, but any illustrations must add value to the policy and the focus must remain on the wording of policy.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	This policy focuses on the use of the corridor for recreational and tourism activities. Despite suggesting in para 7.24 that the corridor "contains significant wildlife habitats" and being recognised in para 7.32 as "having high value for wildlife because of the quality of existing habitats", there is nothing in the policy about protecting and enhancing biodiversity and wildlife in the corridor. For instance, the Leicestershire and Rutland Wildlife Trust have been involved in	Detailed policy guidance on flood risk management is set out in a separate policy, but we agree that the nature of the corridor merits a specific mention of the issue.

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	creating living landscapes through its reserves along the corridor. This policy LP21 needs to be amended to include reference to wildlife habitats, biodiversity and ecological dimensions. In addition, there should be appropriate flood protection and mitigation measures associated with any developments along the corridor.	
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	The Parish Council very strongly supports the Local Plan policies as drafted in connection with River Soar and Grand Union Canal Corridor * and the very important provisions and priorities identified - which must be strictly applied in order to protect the Borough's environmental assets and the health and well-being of Charnwood's communities. The Parish Council particularly welcomes the introduction of the new policy on Tree Planting and trusts that the Borough Council will lead on this in a big way.	Comments are noted
EDCLP/200 Ian Dickinson Canal & River Trust	The Trust welcomes the explicit support for the River Soar and Grand Union Canal Strategy, produced by the River Soar and Grand Union Canal Partnership, which includes both the Borough Council and the Canal & River Trust. Draft Policy LP21 provides a supportive policy framework to help realise the aims of the Strategy in improving and promoting this important waterway corridor where it passes through the Borough.	Support of the Canal and River Trust is welcomed.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	Concern that there is no reference to wildlife, biodiversity, habitat connectivity or nature recovery networks and there is no reference made to the Soar and Wreake Living Landscape, a long-term, landscape-scale project led by LRWT, wildlife corridors, habitat connectivity, a nature recovery network or biodiversity	The plan needs to be read as a whole and also contains policies on biodiversity and geodiversity which needs to be taken into account for any development proposal. We will also review the reference to the Living Landscape Project.
EDCLP/226 Eleanor Hood	The policy states "We will 'only support development proposals which harm'. Shouldn't this say 'which do NOT harm' or 'REJECT development proposals which harm'? [Think this should be for Q27 so also added there]	Comment is noted.
EDCLP/237 P.Williams	I'm surprised the policy says nothing about protecting and enhancing the critical role of the valleys as flood plains	Detailed policy guidance on flood risk management is set out in a separate policy and the entire plan will be subject to a Strategic Flood Risk Assessment.
EDCLP/231 CBC Neighbourhoods and Community Well Being	We welcome Draft Policies LP 19 – LP28 which support the aims and objectives of the Council's adopted Open Space, Playing Pitch and Indoor Built Sports Facilities Strategies. The Chapter promotes the creation of a high quality and healthy local environment and the inclusion of specific Charnwood Forest/National Forest (LP 20), Biodiversity (LP 22) and Tree Planting (LP 23) Policies are welcomed and supported.	Support is welcomed.
EDCLP/203 Leicestershire	Concerned about restrictions imposed on the use of the canal system for ridden horses, either through bylaws or physical	Comments are noted.

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and Rutland Bridleways Association	obstructions such as locks or bridges. However, the river and canal should not be an un-crossable barrier. It should be part of the policy that crossing points should not be constructed, furnished, or signed to deter any non-motorised vulnerable road user.	
EDCLP/192 Severn Trent Water	Severn Trent are generally supportive of the principles outlined within policy LP21 River Soar and Grand Union Canal Corridor, to support and enhance the existing wildlife corridors for the Grand Union Canal and River Soar. There may be a number of benefits though the development of these Bluegreen corridors including water quality improvements. It is noted that one of the objectives is to improve green travel opportunities through these areas, it is recommended that any impermeable area created as part of this approach are drained through the utilisation of SuDS techniques that discharge to a watercourse and that no additional connections are made to the sewerage system for surface water of this type.	Severn Trent Water's comments are welcomed.
DCLP-425-470 Environment Agency	The Environment Agency supports the work of the Soar Catchment partnership which is working closely with the Soar River Corridor group to coordinate and target effort appropriately. With the exception of the third bullet point this Policy is silent on environmental issues such as flood risk mitigation opportunities and how waterways provide important links, habitat and pathways for wildlife. We therefore consider that the Policy should expanded to cover these issue's.	The comments of the Environment Agency are welcomed. Appropriate changes are proposed to the policy to incorporate these views:
EDCLP/193 Richard Webb	The policy is fully supported.	Support for the policy is welcomed.
EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	Support for the policy is welcomed.
DCLP 266 Leicester City Council	The City Council considers that the supporting text to draft Policy LP21 should include a reference to the National Cycle Network routes 6 and 48.	Additional wording will be added to the explanatory text to reference the National Cycle Network.
Do you have any If you don't agree	iversity and Geodiversity comments on this draft policy? with the proposed policy please set out why and what alternative nave missed something?	approach would you suggest?
DCLP/98 Mr Dennis	The policy is supported.	Noted – support is welcomed.
Marchant DCLP/288 and	Natural England welcomes the approach that this policy has taken	Support for the principle of biodiversity net gain is welcomed.

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DCLP/295 Natural England	with respect to the protection and enhancement of biodiversity and geodiversity. In particular we are pleased to note that Biodiversity Net Gain features strongly within both the policy wording itself and the accompanying text. We welcome the intention within the policy wording to prepare a Supplementary Planning Document on Biodiversity Gain and we would be pleased to work with the Council	The Council would welcome the opportunity to engage with NE on the Biodiversity Opportunity Mapping. The objectives to support and enhance GI are embedded throughout the plan, at both a strategic policy level, and a site-specific policy level. The
	and other stakeholders to further this aim. You may want to consider the use of Biodiversity Opportunity	Council is willing to discuss the idea of a specific GI policy with NE.
	Mapping to help identify areas where net gain could be most effectively used to enhance the ecological network of the Borough. We would also suggest that there should be links within this policy to the Council's approach to Green Infrastructure. We suggest that there should also be a separate policy on Green	BMV land is considered as part of the site assessment work in the SHELAA, and the appraisal work in the SA. The policy basis for BMV land is clearly set out at a national level, and there is no need to repeat this policy in the draft local plan.
	Infrastructure which references the Council's strategy to Green Infrastructure and takes a strategic approach to GI across the Borough. Natural England advises that the protection of Best and Most	
	Versatile (BMV) agricultural land (ALC grades 1,2 and 3a) should be given full consideration within the Plan either within this policy or ideally as a separate policy.	
DCLP/369 Mr John Barton	Yes, OK. There's a difficult trade-off here. Don't get too hung up on individual species or trees. The climate is changing anyway and there's nothing we can do locally to stop that. Also, there's a danger that environmental surveys can slow down new-build, adding to cost and continued homelessness.	Noted – the Draft Policy LP22 has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority.
LDCLP/02 Anonymous	All of this development will impact the local areas wildlife and woodlands If you don't agree with the proposed policy please set out why and what alternative approach would you suggest?	Noted – the Draft Policy LP22 has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority.
	More sure natural areas are given a space to breath in the housing areas Do you think we have missed something? Yes management and local woodlands/trees are protected	Draft Policy LP22 will be applied in conjunction with Draft Policy LP19, LP20, and LP23 to provide effective management and protection of the environment, woodlands, and trees.
LDCLP/15 Anonymous	Don't agree with supporting development proposals that harm bio/geo diversity at all, irrespective of exceptional circumstances.	Noted – the Draft Policy LP22 has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high
	Some on the proposed building sites are examples where you are interfering with well developed habits and not supporting the landscape.	priority.
LDCLP/22	It seems strange that although you seek to build a great swathes of	Noted – the Draft Policy LP22 has been drafted to protect and enhance
Anonymous	green field land with huge loss of hedgerows, trees & fields your draft policy reports a net gain in biodiversity – old established trees can't simple be replaced by new young small trees that residents	the natural environment; an objective the Council has identified as a high priority.

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	then cut down. The new developments should be designed incorporating existing older trees into communal areas open land streets, parks & not	Where trees are protected with TPO status, these will be retained and/or appropriately replaced.
	removed to make way for the houses. Do you think we have missed something? Yes. Land set aside for flood defences behind St Hildas Close in Syston could have been planted with trees/hedgerows and opened to the public but one area is fenced & gated off while the other has no planting at all. This land was set aside following previous building developments in the area.	Developments will be required to accord with Draft Policy LP30, LP31, and LP32. Together, these policies will ensure that flood risk management, and necessary flood defences and sustainable drainage systems will be put in place, where required.
LDCLP/34 Anonymous	Everyone needs to be made aware of the richness of the Charnwood environment – what role should the Charnwood museum and town hall play in this awareness.	The draft local plan has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority.
LDCLP/51	Keep destroying it at our peril	The draft local plan has been drafted to protect and enhance the natural
Anonymous	Encourage every natural and sustainable use of both	environment; an objective the Council has identified as a high priority.
EDCLP/39 Lynda Needham	This is a case for ignoring CB own policies especially where Garendon green wedge and Shepshed is being targeted again. Habitats, mature trees have been ripped out and no provision to	The draft local plan has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority.
	reduce the impact of greenhouse gasses. West of Loughborough, around M1 J 23 will be an unhealthy area with no prevision to offset the amount of devastation that the developments proposed and approved as set in the 2015 local plan. CB needs to change direction now	Each of the SUEs is required to prepare both a Development Framework and Green Infrastructure Strategy to ensure that appropriate management and mitigation measures are in place.
EDCLP/108 Sue Barry	Yes very much needed to protect planet Keep Planting more trees and shrubs, in all areas needed on new housing estates	Noted – support is welcomed.
EDCLP/115 Charnwood Constituency	All developments whether residential, commercial or industrial should satisfy the requirements of Planning Policy Schedule 9. This requires that a developments carry out a detailed biodiversity	The Government has captured the principles of PPS9 in the NPPF (2019) and the accompanying PPG.
Labour Party	survey, and that permission is granted only on condition of a demonstrably enhanced biodiversity during and after the development is concluded.	The draft local plan has been prepared in accordance with both the NPPF and PPG.
	The presumption being retention of trees, hedgerows, above ground non culverted water courses and bodies of water and marsh land.	In combination, Draft Policy LP22, along with LP19, LP20, LP23, LP31, and LP32 will provide the policy framework for preserving and enhancing the natural environment.
	Tree surveys to include presumption that "poor quality' trees be retained due to the significant reliance of many insect, bird bat species of dying and decaying older trees. Ditto ivy, mistletoe and other, 'parasites.' Which provide valuable habitat.	
	Commercial and industrial development which contain large	

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	warehouse type structures shall be required to have green roof structures integral to development. Wild flower green roofs will take their place in the effort to reverse the catastrophe decline of wild flowers and associated insect and bird species across Charnwood.	
EDCLP/121 Marie Birkinshaw	7.28 and 7.31 are vitally important and public awareness of this context is key again. The section about exceptional development in 7.36 (that would at some point eliminate the protection of special	Noted – the Draft Policy LP22 has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority.
	zones) is very worrying and would seem to negate the full vision of this section. Perhaps public benefit needs to be addressed in a fuller picture of what nature as a whole ecosystem needs and recognise that public human 'need' is not always the deciding feature.	The Council will consider whether Draft Policy LP22 can be re-drafted to add clarity on the matter of exceptional circumstances
EDCLP/125 Tim Birkinshaw	Although, in principle, this is a good idea, and of vital importance, it must be recognised that any biodiversity gains are hypothetical until after a development is complete and established. Any claims of gain should be treated with caution, few sites (with the exception	Noted – the Draft Policy LP22 has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority.
	of some brown field ones) can ever be improved by being 'developed". All gains should be on site or on adjacent sites; remote 'gains' should be discounted or not allowed. Development proposals which harm internationally, nationally or	The draft local plan, and this specific policy have been prepared in accordance with both the NPPF and PPG. Both the NPPF and PPG allows for off-site mitigation.
	locally designated biodiversity and geodiversity sites and/or Charnwood's priority habitats and species must be opposed in all circumstances as environmentally damaging. Ancient and veteran trees should be included.	Ancient woodland is a national priority habitat and therefore covered by both national policy and by Draft Policy LP22.
	It is not possible to provide a measurable net gain in biodiversity at any site until long after a development has taken place. (Only a possibility of net gain can be postulated). As such this part of the policy is a nonsense. Biodiversity offsetting should never be	
	appropriate, except on an adjacent site. The accompanying Interim Biodiversity Assessment Report is difficult to follow (no obvious key) – more explanation is needed in a readily digestible form.	
EDCLP/126 Silver Fox Development	Biodiversity Net Gain – such a requirement should not be introduced by SPD, unless only aspirational.	The principle of providing measurable net gains in biodiversity – either on-site of through biodiversity off-setting is a corporate priority.
Consultancy on behalf of Mr. Tony Shuttlewood		The ability to achieve this aim via an SPD, versus a more detailed policy in the draft local plan is noted.
EDCLP/130 Lee Perkins	All developments whether residential, commercial or industrial should satisfy the requirements of Planning Policy Schedule 9. This requires that a the authority carry out a detailed biodiversity	The Government has captured the principles of PPS9 in the NPPF (2019) and the accompanying PPG.

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	survey, and that permission is granted only on condition of a demonstrably enhanced biodiversity during and after the development is concluded. The presumption being retention of trees, hedgerows, above ground non culverted water courses and bodies of water and marsh land. Tree surveys to include presumption that "poor quality" trees be retained due to the significant reliance of many insect, bird and bat species on dying and decaying older trees. Ditto ivy, mistletoe and other 'parasites', which provide valuable habitat.	The draft local plan has been prepared in accordance with both the NPPF and PPG. In combination, Draft Policy LP22, along with LP19, LP20, LP23, LP31, and LP32 will provide the policy framework for preserving and enhancing the natural environment.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	The important and urgent ecological and biodiversity emergency with the loss of habitats and extinction of species needs much greater recognition. Leicestershire has seen a significant loss of habitats and species over the last 50 years. Therefore enhancing biodiversity and reversing this decline should be a key policy objective. However, the approach in Policy LP22 appears to be much more about maintaining and protecting existing features such as protecting and enhancing national and local priority habitats and species rather than reversing their decline. Unless very carefully controlled, development will continue to threaten elements of the natural environment. The idea of Biodiversity Gain could be a positive step forward in the planning system in arresting the loss of habitats and species. But that depends on how the idea is interpreted and applied. We have concerns about the way in which off-site compensation might be applied. For example, compensating for the loss of mature trees in one development by planning new trees elsewhere is unlikely to be a biodiversity gain. We would like to see a much stronger reference to applying principles of biodiversity gain in this policy. As it is a relatively new concept the policy should include guidance as to how it may be implemented. Accordingly, we support the commitment in Policy LP22 to produce a Supplementary Planning Document on Biodiversity Net Gain. It would be good if a draft was available for discussion at the plan's examination in public. Another CPRE concern is the lack of national designations to protect the countryside of both Leicestershire and Charnwood. There are no Green Belts, National Parks or ANOBs in the county and within Charnwood only a number of SSSIs and relatively small National Nature Reserves are protected. Accordingly CPRE consider that the Local Plan should emphasise policies which	Noted – the Draft Policy LP22 has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority. Further guidance is expected to be provided via an SPD.

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	enhance protection of the countryside, biodiversity and green spaces.	
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	The Parish Council very strongly supports the Local Plan policies as drafted in connection with: * Countryside and Landscape * Charnwood Forest and National Forest * River Soar and Grand Union Canal Corridor * Biodiversity and Geodiversity * Tree Planting * Heritage * Healthy Communities, Open Space, Sport and Recreation * Indoor Sports Facilities * Protection of Community Facilities and the very important provisions and priorities identified - which must be strictly applied in order to protect the Borough's environmental assets and the health and well-being of Charnwood's communities. The Parish Council particularly welcomes the introduction of the new policy on Tree Planting and trusts that the Borough Council will lead on this in a big way.	Noted – support is welcome,
EDCLP/200 Ian Dickinson Canal & River Trust	Draft Policy LP22 seeks to conserve and enhance the natural environment and the Trust is pleased that the River Soar corridor is specifically referred to within the policy. We suggest that this could include reference to the Grand Union Canal as well; although the canal is an artificial waterway, it nonetheless provides a valuable habitat for local wildlife.	Noted – agree that Draft Policy LP22 should be updated to included reference to the Grand Union Canal, as per the policy intention set out in Draft Policy LP21.
EDCLP/216 Tom Collins Ninteen47 obo	If a local target for Biodiversity Net Gain is to be introduced ahead of the forthcoming requirement within The Environment Bill then this should be included within the Local Plan in order that it can be	The principle of providing measurable net gains in biodiversity – either on-site of through biodiversity off-setting is a corporate priority.
Davidsons & Redrow	fully examined. It is not appropriate for an SPD to introduce requirements which can have a significant impact on developments without having been subject to proper examination, and inclusion in the whole-plan viability testing. However, it is considered most appropriate that requirements for biodiversity net gain are left to the separate legislation which is already being brought forward, with any SPD advising only on how it may be brought forward within the Borough.	The ability to achieve this aim via an SPD, versus a more detailed policy in the draft local plan is noted.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	We would like a reference being made to the mitigation hierarchy, and to ensuring that developers work through that hierarchy in making their proposals for development? What about managing habitats and monitoring them after the development is finished to see if the development has supplied a	Biodiversity management and monitoring plans are to be agreed with the developer through the Development Management process. It is common that such items and expectations are conditions attached to the terms of the planning permission.
	net gain for biodiversity and the habitats are of high quality?	The comments on the parameters for, monitoring and measuring

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	 7.28 – good 7.30 – good 7.29 – what about the internationally important geology? 	biodiversity net gain, are noted. The Council would welcome engagement with L&R WT on the preparation of the SPD.
	7.31 – don't just limit damage and habitat fragmentation; allow the recovery of species and development of functioning ecological networks to allow our wildlife to prosper in the future. This needs to go further and promise a net gain in biodiversity, recovery of our ecological networks and enhancing them so that they function as they should. A stronger commitment to our natural world is needed.	
	7.32 – what about the Charnwood Forest and Soar and Wreake Living Landscapes – areas chosen for their value for wildlife?	
	7.33 and 7.34 – what about the other important habitats in the Charnwood Forest? Ancient woodlands and trees are very important, but there are other, equally valuable, rare habitats that deserve a special mention. The geology of Charnwood Forest is of international importance and it contains a variety of wildlife habitats that are considered to be of national, regional and local importance. Semi-natural ancient woodland, pasture woodland, unimproved neutral grassland and marsh are the most valuable habitats.	
	7.34 – what about the veteran trees of the future?	
	7.35 – great. We welcome this. The recent Habitat Network Mapping Exercise for the CFRP HLF project should help to inform decisions and, in the remainder of the area, effort should be made to 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation' as per the NPPF.	
	7.36 – you should aim for a net gain in biodiversity, not 'development proposals avoid any impact on biodiversity'. This would be in line with the NPPF.	
	Biodiversity Net Gain - Avoid the loss of irreplaceable habitats including ancient	

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	species rich grasslands, ancient woodland, veteran trees and	
	 wood pasture. Avoid loss of LWS 	
	- Enhance connectivity not just by removing barriers, create	
	good quality habitat.	
	- Natural regeneration should be considered as an alternative to	
	tree planting	
	New NPPF guidance – swifts and hedgehogs	
EDCLP/226	The policy state proposalsment is statement is surely incorrect. It	Noted – the wording in Draft Policy LP22 is correct, as the intention is
Eleanor Hood	says you will 'only support development proposals which harm'.	that exceptional circumstances must apply, and that there are criteria
	Shouldn't this say 'which do NOT harm' or 'REJECT development	which must be met in order to the Council to confirm that exceptional
	proposals which harm'?	circumstances have been demonstrated.
	With tree planting could you have a system of insisting on a certain	However, the Council does acknowledge that the policy wording could be
	number of trees being planted in new developments, especially	misconstrued, and will consider alternative wording to improve clarity.
	bigger ones and ones by the M1. [Think this should be for Q27 so	
	also added there]	
EDCLP/254	Rainier agree that biodiversity and Geodiversity are important	Noted – support is welcome.
Ian Deverell	considerations in the development of sites and should be	
Turley on behalf of Rainier	considered from the outset as part of the development of any design proposals for sites. It is welcomed that the proposed policy	
Developments	includes suitable flexibility to allow those sites which are unable to	
Ltd)	provide a net gain across the site to make an offsite contribution	
	where appropriate.	
	Rainier have considered the conservation and enhancement of	
	biodiversity and geodiversity throughout the preparation of their	
	proposals for the site and the illustrative masterplan enclosed	
	within the Vision Document provides a significant proportion of the	
	site for open space and ecological enhancement.	
EDCLP/255	Rainier agree that biodiversity and Geodiversity are important	Noted – support is welcome.
Ian Deverell	considerations in the development of sites and should be	
Turley on behalf of Rainier	considered from the outset as part of the development of any design proposals for sites. It is welcomed that the proposed policy	
Developments	includes suitable flexibility to allow those sites which are unable to	
Ltd (Wymeswold)	provide a net gain across the site to make an offsite contribution	
	where appropriate.	
	Rainier have considered the conservation and enhancement of	
	biodiversity and geodiversity throughout the preparation of their	
	proposals for the site and the illustrative masterplan enclosed	
	within the Vision Document provides a significant proportion of the	
	site for open space and ecological enhancement.	
EDCLP/241	Provision for nature and wildlife needs to be improved. You should 960	Noted – the Draft Policy LP22 has been drafted to protect and enhance

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L. Tomalin	not cut down natural habitats for wildlife such as the wanton destruction that has occurred at the M1 junction 24.	the natural environment; an objective the Council has identified as a high priority.
EDCLP/231 CBC Neighbourhoods and Community Well Being	We welcome Draft Policies LP 19 – LP28 which support the aims and objectives of the Council's adopted Open Space, Playing Pitch and Indoor Built Sports Facilities Strategies. The Chapter promotes the creation of a high quality and healthy local environment and the inclusion of specific Charnwood Forest/National Forest (LP 20),	Noted – support is welcome. At present, it is not felt that every asset should be listed in the draft policy.
	 Biodiversity (LP 22) and Tree Planting (LP 23) Policies are welcomed and supported. Text should reference the full SSSI name of Outwoods complex (Beacon Hill, Hangingstone and Outwoods SSSI). Also, no mention of heathland and parkland landscapes such as Bradgate. E.g. Many of the veteran trees are associated with former deer parks/woodpasture. 	The various types of landscapes across Charnwood are captured within the local Landscape Character Assessments. Draft Local Policy LP19, specifically references that new development should protect landscape character and to reinforce sense of place and local distinctiveness by taking account of relevant local Landscape Character Assessments.
EDCLP/203 Leicestershire and Rutland Bridleways Association	Q27 LP22 Biodiversity. Grazed grassland has its own valuable ecology which is being lost as grazing fields are converted to arable. One way of saving this ecology, at least partially, is to mow roadside verges to their full width so that blackthorn etc does not take over, and maintain them so that they can be used by walkers and horse-riders. This would contribute to road safety as well as ecology.	Noted – the Draft Policy LP22 has been drafted to protect and enhance national and local priority habitats and species. This response will inform the final drafting of the policy.
EDCLP/192 Severn Trent Water	Severn Trent are supportive of the principles outlined within Policy LP22 conserving and Enhancing Biodiversity and Geodiversity.	Noted – support is welcome.
DCLP-425-470 Environment Agency	((7.36 - Biodiversity Net Gain Box) - Reference should be made to river restoration within this box. River restoration brings a number of wide-ranging benefits and hence deserves a mention here).	Noted – the list of measures in Para. 7.36 are examples of interventions. There is nothing to preclude river restoration schemes.
	We welcome the wording of this policy but make the following comments: Bullet point 2 should be expanded to read: "River Soar and Wreake corridors (including their tributaries) and Charnwood Forest".	The Council agrees that the wording under Bullet Point 2 can be expanded to reference: "River Soar and Wreake corridors (including their tributaries) and Charnwood Forest".
	Biodiversity Net Gain should be required for all developments as standard. This would help Charnwood Borough Council meet its duty under Section 40 of the Natural Environment and Rural Communities Act 2006.	
DCLP 265 Silver	Biodiversity Net Gain – such a requirement should not be	The principle of providing measurable net gains in biodiversity – either

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Fox obo Ms J & Ms A Kimber	introduced by SPD, unless only aspirational.	on-site of through biodiversity off-setting is a corporate priority.
		Draft Policy LP22 stipulates that development will be supported that provides a measurable net gain in biodiversity. The Council is not solely introducing the requirement by SPD.
DCLP/261 Edward Argar MP	Question 27 - The recognition both of the importance of enhancing and protecting our environment and local biodiversity, as well as the need to keep the distinct character of our countryside and villages is extremely important and in this context I highlight the importance of 7.12	Noted – support is welcome.
DCLP/260 National Forest Philip Metcalfe	The NFC supports this policy which seeks to conserve and enhance the natural environment.	Noted – The Council acknowledges that increasing resilience of the natural environment is an important component of managing the impacts of development and climate change.
	However, the NFC considers that this should go further and seek to increase the resilience of the natural environment in order to cope with the proposed growth expected through the plan period. This could be delivered through a re-writing of this policy or through amendments to other policies, such as LP3 as set out above.	The Council would welcome the opportunity to work with the National Forest to ensure resilience is featured in the draft local plan and/or included in Draft Policy LP22.
EDCLP/252 Leicestershire County Council	Not sure LP22 adequately recognises the intrinsic value of the natural environment, its value as natural capital and the range of ecosystem services that it provides and therefore is unlikely to protect it.	Noted - the Draft Policy LP22 has been drafted to protect and enhance the natural environment; an objective the Council has identified as a high priority.
EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	Noted – support is welcome.
Q28 - LP23 - Tree	Planting	
How do you think DCLP/50	we can best achieve our aspiration of significantly increasing the	
Ms Suzanne Collington	Sponsorship or lottery funding so people could be encouraged to plant trees in designated areas for good causes.	The comment is noted. Sponsorship and lottery funding could help support policy implementation.
DCLP/99 Mr Dennis Marchant	The policy is supported.	Support for the policy is welcomed.
DCLP/164	The Borough needs to play its part in seeing at least 300,000	Comments are noted.
County Councillor	hectares of woodland are planted annually in the UK. This is the	The Council agreed a motion on 24 th June 2019 to enhance its existing
Max Hunt	Government's minimal target though it can only be achieved with local partnerships and plans. Charnwood should consider setting targets or requirements within the Plan. Perhaps, the maps associated with this Plan should include areas where woodland can	Carbon Management Plan and green impact policies and support new ones, such as to get 100,000 trees planted over the next 4 years.

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	be created, more or less in the same way that wind can be exploited.	
DCLP/287 Natural England	Natural England welcomes the intention of the Plan to increase the number of trees across Charnwood but would advise that this should not be to the detriment of other important natural habitats and that appropriate native tree species are used.	This sound advice is welcomed, however, the policy already recognises that tree planting will not be suitable in all areas and specifically refers to the impact upon habitats and biodiversity.
DCLP/370 Mr John Barton	Supports more tree planting.	Support is welcomed.
LDCLP/02 Anonymous	More trees which will not have to be cut down due to being the wrong type of tree	Comment is noted.
LDCLP/22 Anonymous	Existing established/old trees should be preserved within the developments. Also hedgerows should be preserved.	Comments are noted.
,		The policy refers to maintaining tree cover and retaining existing trees as well as planting new trees.
LDCLP/34 Anonymous	Encourage schools to plant more trees. Encourage churches to plant more trees. Encourage sports clubs to plant more trees. Plant more trees in private gardens. Plant more trees on roadside verges. Ensure acorn and horse chestnuts are planted whenever possible.	The suggestions as to how the Borough can effect a step change in tree planting are welcomed.
LDCLP/51 Anonymous	Every little area that has no other use should be looked at for tree planting.	The comment is noted but tree planting will not necessarily be suitable on every site so we will seek to balance tree planting against other important site considerations including its impact on habitats and local biodiversity.
EDCLP/34 Cllr Mary Draycott	It's great to increase the number of trees, however some honesty is needed in the Plan because any new development means trees, hedges etc get cut down. The rule of bird nesting is rarely applied. In addition when infrastructure goes in such as the current A512/Jct 23 road works for the Garendon Estate, hundreds of trees are chopped down and it was and still is shocking. There needs to be a figure acknowledging in any development how many trees, bushes etc will be lost.	Comments are welcomed. It is true that major developments may involve tree loss but a strong positive policy in the local plan can help to ensure that tree retention and new planting are prioritised in the consideration of a planning application.
EDCLP/52 Shepshed Town Council	'We are proposing to work with our partners to achieve high levels of tree planting across the Borough'.Our experience in Shepshed is of destruction of trees, not planting. We would appreciate details of plans to achieve high levels of tree planting.	Comments are noted. It is true that major developments may involve tree loss but a strong positive policy in the local plan can help to ensure that tree retention and new planting are prioritised in the consideration of a planning application.
EDCLP/59 Anonymous	Summary (for Draft Policy LP23 only)	Comments on community involvement in tree planting are welcomed.

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	In achieving this, all communities in Charnwood, including towns, Service Centres, villages etc. could be charged with designing and delivering a tree planting programme and related activities that are carefully staged to 2036. Although currently untested, Quorn residents might well be pleased to take the initiative in view of the many benefits to Quorn and Charnwood as a whole.	
EDCLP/74 Mr Hussain	 This is such an important and critical initiative in which everybody in the borough should rightly be concerned about and it is an initiative that will require a significant amount of consistent marketing and utilising a good marketing mix to get the importance of the message through. There are various angles to promote things such as this and some really enjoyable ones "if you will only but see common ground for community cohesion". However, as important as the trees may well be and they are 	The Local Plan seeks to meet housing needs in the Borough by making provision for new homes including affordable housing for those who cannot afford market prices. The plan does however provide guidance for a wide range of other issues including tree planting so as to enhance our natural environment and address climate change.
	 critical to our survival as a species, the issue of housing still takes precedence in order to remove the misery from people's lives so that they may have other and more important things to contemplate over instead of the misery that dwells within their inadequate surroundings. Subsequently, the contemplation of trees, is one that every "household" must consider as their duty to engage with the significance of its ongoing development. However; the key word is "household" so precedence is once again taken by housing. 	
	Man will only engage in meaningful contemplation when his surroundings are fit to contemplate in. The psychology of an individual's hopeless existence has got to be reversed so that society has been given the fairest opportunity to release the hidden potential buried deep within the shackles of poverty it too has needlessly created. Reverse the psychology and build a better future for our children.	
EDCLP/108 Sue Barry	Yes to more and more tree planting, encourage everyone to plant a tree as absorbs water. Tree lined streets. Stop developers removing established trees at Junction 23.	Support for the policy is welcomed. The removal of trees in the proximity of Junction 23 of the M1 was necessitated by the highway scheme to improve access in this area. The policy does not mean that no trees will be removed in all circumstances but it does signal the Council's intent to promote tree

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		planting across the Borough and to protect existing trees whenever possible.
EDCLP/121 Marie Birkinshaw	Consider doing something similar to 'Naturehood' projects run by the EarthWatch Institute in Oxford and Swindon where neighbours work together to develop a thriving network of wildlife-rich green spaces that benefit both people and nature.	The comments are welcomed as it is useful to look at best practice elsewhere. The Local Plan will also seek to conserve and enhance biodiversity and
	· · ·	green infrastructure.
EDCLP/125 Tim Birkinshaw	Tree planting will become increasingly necessary to try to mitigate against climate change.	Comments are noted.
	Tree planting should be encouraged, even enforced, not only street trees (on both new and established streets) but also to create windbreaks, screens and new areas of woodland and extend	The policy wording expresses a presumption that tree planting will take place on site.
	existing areas. Planting should also include hedging, and should be of native species. <i>Leylandii</i> and other non-native conifers should be forbidden as they reduce biodiversity.	The Council agreed a motion on 24 th June 2019 to enhance its existing Carbon Management Plan and green impact policies and support new ones, such as to get 100,000 trees planted over the next 4 years.
	Commuted sums should only be used as a last resort and only then for tree planting on nearby sites.	
	The Borough should be ready to support national tree planting initiatives to try to mitigate against climate change.	
EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	This policy is supported.	Support for the policy is welcomed.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We agree with the aspiration to increase the number of trees in Charnwood. The Council should proactively engage with local landowners, farmers and organisations like the Leicester and Rutland Wildlife Trust, Woodlands Trust, community organisations, schools and Parish Councils to investigate, incentivise and run tree planting schemes. Neighbourhood planning groups should identify suitable sites for tree planting in their neighbourhood.	Comments are welcomed.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	The Parish Council very strongly supports the Local Plan policies as drafted in connection with Tree Planting and the very important provisions and priorities identified - which must be strictly applied in order to protect the Borough's environmental assets and the health and well-being of Charnwood's communities.	Comments of Mountsorrel Parish Council are welcomed.

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EDCLP/163 Liz Hawkes Anstey Parish Council	The Parish Council particularly welcomes the introduction of the new policy on Tree Planting and trusts that the Borough Council will lead on this in a big way. Tree Planting is documented in draft policy LP 23. Areas within Anstey for tree planting are identified as Link Road Playing Field, the Bottom Green at Leicester Road and Mitchells Field along the Cropston Road. These areas will be given further considerations during the development of Anstey's Neighbourhood Plan.	Comments of Anstey Parish Council are welcomed.
EDCLP/187 Jim Smith	In chapter 7 (Environment) much is said about protecting the natural heritage, especially trees, and yet currently a development is in progress locally where authority has been given (apparently) for the destruction of several mature trees.	The policy does not mean that no trees will be removed in all circumstances but it does signal the Council's intent to promote tree planting across the Borough and to protect existing trees whenever possible.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	Natural regeneration should be considered as a more appropriate option before taking a decision towards planting plantations. Any trees that are planted should not be done so at the expense of other, more valuable, habitats such as species rich grassland, waterbodies, heathland. Trees shading waterbodies / courses and outcrops can also damage these habitats and the organisms that live on / in them e.g. lichens. There are other habitats that sequester carbon just as much or even more than plantations (<u>Carbon storage by habitat - Natural England</u>) 7.40 what about natural regeneration to create woodland? This may be better than planting.	Comments are welcomed. Separate policy guidance is provided on conserving and enhancing biodiversity.
EDCLP/226 Eleanor Hood	With tree planting could you have a system of insisting on a certain number of trees being planted in new developments, especially bigger ones and ones by the M1.	The Council agreed a motion on 24 th June 2019 to enhance its existing Carbon Management Plan and green impact policies and support new ones, such as to get 100,000 trees planted over the next 4 years. The scope for tree planting will be considered as part of each planning application as this will vary depending on the characteristics of the site and the nature of the development proposals.
EDCLP/254 Ian Deverell Turley on behalf of Rainier Developments Ltd)	While we appreciate that the protection and enhancement of the natural environment through additional tree planting is a key strategy for Charnwood, the wording of this policy is unable to recognise wider ecological benefits of proposed developments. For example, a site which is providing open space in excess of policy requirement together with areas of ecological rich grassland may be delivering a net gain in biodiversity across the site, but fall foul of an net gain in the planting of new trees. Rainier consider that draft Policy LP23 should be suitably flexible	The scope for tree planting will be considered as part of each planning application as this will vary depending on the characteristics of the site and the nature of the development proposals Separate policy guidance is provided on conserving and enhancing biodiversity.

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	and able to recognise wider ecological and biodiversity improvements associated with development.	
EDCLP/255 Ian Deverell Turley on behalf of Rainier	While we appreciate that the protection and enhancement of the natural environment through additional tree planting is a key strategy for Charnwood, the wording of this policy is unable to recognise wider ecological benefits of proposed developments. For	The scope for tree planting will be considered as part of each planning application as this will vary depending on the characteristics of the site and the nature of the development proposals
Developments Ltd (Wymeswold)	example, a site which is providing open space in excess of policy requirement together with areas of ecological rich grassland may be delivering a net gain in biodiversity across the site, but fall foul of an net gain in the planting of new trees.	Separate policy guidance is provided on conserving and enhancing biodiversity.
	Rainier consider that draft Policy LP23 should be suitably flexible and able to recognise wider ecological and biodiversity improvements associated with development.	
EDCLP/241 L. Tomalin	Provision for nature and wildlife needs to be improved. You should not cut down natural habitats for wildlife such as the wanton destruction that has occurred at the M1 junction 24.	The removal of trees in the proximity of Junction 23 of the M1 was necessitated by the highway scheme to improve access in this area.
		The policy does not mean that no trees will be removed in all circumstances but it does signal the Council's intent to promote tree planting across the Borough and to protect existing trees whenever possible.
EDCLP/237 P.Williams	Why no targets for tree coverage? Why no comments on appropriate species?	The Council agreed a motion on 24 th June 2019 to enhance its existing Carbon Management Plan and green impact policies and support new ones, such as to get 100,000 trees planted over the next 4 years.
		The scope for tree planting will be considered as part of each planning application as this will vary depending on the characteristics of the site and the nature of the development proposals
EDCLP/231 CBC Neighbourhoods and Community	We welcome Draft Policies LP 19 – LP28 which support the aims and objectives of the Council's adopted Open Space, Playing Pitch and Indoor Built Sports Facilities Strategies. The Chapter promotes the creation of a high quality and healthy local environment and the	Comments are noted. The detailed information on Ash dieback is welcome.
Well Being	inclusion of specific Charnwood Forest/National Forest (LP 20), Biodiversity (LP 22) and Tree Planting (LP 23) Policies are welcomed and supported.	Paragraph 7.42 was worded as part of the consultation and will be amended for the next version of the plan.
	Para 7.39 - Needs to reference more recent concerns over Ash Die Back and potential losses to approximately 60-90% of ash throughout the UK. First confirmed in Britain in 2012, ash dieback is a disease of ash trees caused by a fungus called Hymenoscyphus	
	fraxineus. A high proportion of ash trees in Northern Europe have	

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	been infected and the disease is now widespread in England.	
	Ash dieback is evident in ash trees in parts of Leicestershire and the National Forest. The fungus is spread by the wind or by the movement of diseased ash trees.	
	There are no exact figures of the number of ash trees in Leicestershire, but it's estimated there are over 500,000 in the county. The long-term impact of ash dieback is likely to be: •loss of up to 90% of ash trees, with significant long-term impact on our woodland landscapes •probable replacement of ash woodland by scrub and other tree species •an associated loss of biodiversity •dying trees (that can become a danger) and the need for replacement trees	
	 loss of trees can also impact on flooding and climate change Para 7.42 - The wording of this paragraph seems strangely phrased– Seems to pose a question and not sure this is appropriate? 	
	Para7.41/7.42 and Draft Policy LP 23 - Policy unclear and too open to interpretation. Outside of Charnwood Forest area what level of tree planting will be expected and how are off-site commuted sums going to be calculated e.g. National Forest rate?	
	Tree planting rates should be linked to clear strategic objectives and evidence. E.g. existing canopy cover of trees/other vegetation across the Borough to enable a realistic target to be set for new development. This is being successfully implemented in Wycombe <u>https://www.wycombe.gov.uk/pages/About-the-council/Have-your- say/Consultations/Consultation-Canopy-Cover-Supplementary- Planning-Document.aspx</u>	
	Charnwood Borough currently has a canopy cover of 13.361% which ranges from 28.978% tree cover for Bradgate ward to 5.93% for Syston East. The Forestry Commission recommends setting a canopy cover target of at least 20% for UK towns and cities.	
EDCLP/203 Leicestershire	Where there is mass tree planting, the usual space between the trees and the field boundary alongside a road should be made	We welcome the detailed comments on maintaining trees and vegetation so as to not obstruct movements by horse riders and other vulnerable

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and Rutland Bridleways Association	 available to VRUs – see Q25 above. So often one rides along a road and sees fenced-off planting some metres beyond the field's boundary hedge or wall and wishes it was possible to get off the road for that length instead of being vulnerable in the traffic. That any roadside or edge-of-planting trees which might (however rarely) be ridden under should have a minimum mature lower-branch clearance of at least 3 metres so that they do not prevent walkers or riders using any verge or require them to veer out into the traffic to pass a tree. The rules about hedges not hanging out and obstructing footways 	road users. It is the responsibility of the County Council to maintain the safe operation of the highway and the level of detail is too detailed for the Local Plan.
	in towns should also be applied to rural verges so that the full width of the public highway is available to travellers. Verges are the 'life savers' for VRUs.	
EDCLP/192 Severn Trent Water	Severn Trent are supportive of the approach to plant more trees, as detailed above, we are aware of the potential positive impacts that planting trees can have on water quality, flood risk and climate change. It may be difficult to encourage large areas of the new development sites to be planted with trees, however the use of source control SuDS techniques such as tree-pits could increase the benefits and uptake of trees within new development, as they will be providing multifunctional space, with the potential to reduce the size of the site control SuDS such as attenuation basins. Promoting the use of trees, the benefits through inclusion as part of the surface water solution, may help with the affordability of additional trees within development.	The comments of Severn Trent are welcomed. The Local Plan also includes policies om Flood Risk Management and Sustainable Drainage Systems which these comments relate to.
EDCLP/159 C.Mulvaney	There are many areas where we can increase the number of trees in the Borough, for example, on Leconfield Road and Nanpantan Road there are wide grass verges where tress could easily be planted. In addition, any planning permissions for new build must stipulate that the developer include areas for trees, for example, in car parks etc. The car park at Holywell Park is a great example of a green, forested car park.	Comments are welcomed.
EDCLP/253 Ann Irving	My parish has several large sites that could be at risk but which would be ideal locations for large increases in tree cover. The National Forest is doing what it can, but policies to support tree planting instead of alternative development on those vulnerable sites would not only be in tune with the 'Forest' name but also on land that lends itself to forestation. The sites include Welbeck: the	Comments are welcomed.

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	Defence Sixth Form College, Beaumanor, and Maplewell Hall. There is also considerable farm land and, if farms become unsustainable, forestation would be a fitting alternative use, or provide suitable diversification for the landscape. It is too valuable to be turned into concrete.	
EDCLP/ 245 Avison Young obo Loughborough University	The University believes that the policy, as currently worded, strikes an appropriate balance between delivering new tree planting as part of development proposals and ensuring that those existing trees that are worthy of retention within development sites are retained where appropriate.	Support for the policy is welcomed.
EDCLP/239 Vivienne Barratt- Peacock	Prevent development whereby established/ancient trees would need to be felled to allow access/building. The Free trees scheme is great but collection is difficult. Allowing trees to be collected from a greater variety of locations (eg Parish councils) would really help.	The policy does not mean that no trees will be removed in all circumstances but it does signal the Council's intent to promote tree planting across the Borough and to protect existing trees whenever possible.
EDCLP/193 Richard Webb	There should be a net increase target here. If, through development for housing, commercial or infrastructure, there is a need to remove any tree, regardless of size, then it is replaced with at least one other of (similar size where possible).	Comments are noted.
DCLP 265 Silver Fox obo Ms J & Ms A Kimber	This policy is supported.	Support for the policy is welcomed.
DCLP/260 National Forest Philip Metcalfe	Naturally, the NFC supports the purpose of this policy which seeks to maintain and extend tree cover. The NFC considers that more detail is required regarding the Planting Guidelines including an indication of the scale and type of development that will trigger these and where the Guidelines can be found. A link could be provided to our guidance or the key details in an Annex to the Local Plan, which is an approach adopted by other Local Authorities. Alternatively, Table 6, which lists open space requirements could be expanded to include the proportion if the site to be woodland planting and landscaping.	Comments of the National Forest Company are welcomed.
	The policy should be clear that where the National Forest planting guidelines apply they take priority and that the remainder of the policy applies outside of the National Forest. This will ensure that developers are clear how much tree planting they are expected to accommodate and which commuted sum methodology will apply.	

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	The Borough Council should consider undertaking an iTree assessment of canopy cover within its main urban area. This would provide a baseline and comparable figures for tree cover across the Borough. This policy could then be tailored to focus more tree planting where canopy cover is low and be used as justification for retaining existing trees in those areas. The iTree results could also feed into other Borough Council tree planting initiatives.	
EDCLP/252 Leicestershire County Council	Not sure LP22 adequately recognises the intrinsic value of the natural environment, its value as natural capital and the range of ecosystem services that it provides and therefore is unlikely to protect it.	The scope for tree planting will be considered as part of each planning application as this will vary depending on the characteristics of the site and the nature of the development proposals Separate policy guidance is provided on conserving and enhancing biodiversity.
EDCLP/252 Leicestershire County Council	Leicestershire County Council would welcome involvement in the production the SPD on Biodiversity Net Gain recognising that habitat networks are cross district and therefore a strategic approach to the production of the SPD is essential.	Comment is noted.
EDCLP/252 Leicestershire County Council	LCC would be keen to ensure our Tree Implementation Plan is connected to Charnwood Tree Strategy	Comment is welcomed. Work will progress to ensure that the linkage is established.
EDCLP/252 Leicestershire County Council	The CHA acknowledges the role that trees can play in enhancing the quality of the area and helping to tackle climate change, including those planted as part of new developments. However, for these benefits to be realised in practice, it is vital that any newly planted trees that are likely to interact with the public highway are covered by effective management and funding arrangements for the lifetime of the development. Either through additions or amendments to the draft policy, or through supporting text, the CHA would expect the Local Plan to set out how this is expected to be achieved (e.g. through commuted sums and management companies/trusts).	Comments of Leicestershire County Council as highway authority are welcomed.
EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	Support for the policy is welcomed.
EDCLP/272 Centre for Sustainable	We would suggest amending the text of policy LP 23 to refer specifically to the role of tree planting in climate change adaptation, as discussed in the supporting text, see below.	We acknowledge the important role of trees in climate change adaptation and will review the plan's wording to this effect.

 clear how contributions would be calculated from your policy, as no target is included for how much on-site planting is required. The policy should go further to require replacement planting where planning applications propose tree removal. Reference is made to Bristol City Council's policy which requires multiple trees to be planted to compensate for trees being removed, according to the size of the tree lost. Bristol City Council Draft Policy LP23 	DECONNEE NO		
 Energy via Cllr Needham Whilst the principle of funding off-site planting is supported, it is not clear how contributions would be calculated from your policy, as no target is included for how much on-site planting is required. The policy should go further to require replacement planting where planning applications propose tree removal. Reference is made to Bristol City Council's policy which requires multiple trees to be planted to compensate for trees being removed, according to the size of the tree lost. Bristol City Council Draft Policy LP23 		REPRESENTATION SUMMARY	OFFICER RESPONSE
We will seek to protect and enhance our natural environment, and increase our resilience to the impacts of climate change by increasing the number of trees in Charnwood. We will do this by supporting development proposals which maintain and extend tree cover through: • Maximising Previding tree planting on-site where consistent with other policies; and • Retaining existing trees where appropriate. • Providing, funding the provision of replacement trees, including street trees, where the loss of or impact on trees in a development is considered acceptable. Where on-site planting is not possible due to the size of site, its characteristics or the impact upon habitats and biodiversity we will encourage trees to be planted at a suitable location outside the site either directly, or through a commuted sum. Within the area of Charnwood Forest we will support development proposals which follow the latest National Forest planting guidelines. We will encourage neighbourhood plans to identify suitable locations for additional tree planting.	Energy via Cllr	 clear how contributions would be calculated from your policy, as no target is included for how much on-site planting is required. The policy should go further to require replacement planting where planning applications propose tree removal. Reference is made to Bristol City Council's policy which requires multiple trees to be planted to compensate for trees being removed, according to the size of the tree lost. Bristol City Council Draft Policy LP23 Draft Policy LP23 Tree Planting We will seek to protect and enhance our natural environment, and increase our resilience to the impacts of climate change by increasing the number of trees in Charnwood. We will do this by supporting development proposals which maintain and extend tree cover through: Maximising Providing tree planting on-site where consistent with other policies; and Retaining existing trees where appropriate. Providing, funding the provision of replacement trees, including street trees, where the loss of or impact on trees in a development is considered acceptable. Where on-site planting is not possible due to the size of site, its characteristics or the impact upon habitats and biodiversity we will encourage trees to be planted at a suitable location outside the site either directly, or through a commuted sum. Within the area of Charnwood Forest we will support development proposals which follow the latest National Forest planting guidelines. We will encourage neighbourhood plans to identify suitable locations for additional tree 	Signposting to the policies of other plans is appreciated as it is useful to

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	In the first of these cases the council will locate replacement tree planting in areas of hard standing as close as reasonably practical to the development site; and in the second of these cases the Council will implement tree planting in specific locations identified through the planning approval process. The number of trees required to compensate for loss of existing trees depends upon the size of the trees to be lost. This is set out in the following table: Trunk Diameter of Tree lost to development Number of (cm measured at 1.5 metres above ground level) Replacement Trees (ess than 15 0 - 1 1 2 0 - 29.9 1 - 20 - 29.9 1 2 0 - 29.9 1 - 20 - 29.9 1 - 20 - 29.9 1 - 20	
EDCLP/159 C.Mulvaney	As an aside, I thank the Council for making available several thousand trees for local residents. Maybe this is something that can be repeated.	Your comment is welcome. The initiative was well received and is part of the Council's commitment to tree planting.
If you don't agree Do you think we h	age comments on this draft policy? with the proposed policy please set out why and what alternative nave missed something?	
DCLP/51 Ms Suzanne Collington	Heritage is important and should be protected.	Noted – support for objectives of policy is welcomed.
DCLP/107 Mr Dennis Marchant	The policy is supported.	Noted – support is welcomed.
DCLP/135 Mr Martin Peters	 The need to preserve and protect our heritage is essential. Increasing public awareness of heritage assets can be an important tool in achieving this. Therefore, it would be good to see a commitment to improving and increasing public access as part of this strategy. 	 Noted – support for objectives of policy is welcomed. Public access cannot be controlled through the planning system. The Council will consider whether it can do more to present the evidence regarding the Borough's heritage assets in a more accessible way to promote understanding of them.
Mr Gideon Cumming	Policy to protect non-designated heritage assets is supported.	Noted – support is welcomed.
DCLP/371 Mr John Barton	Forget heritage. We have a housing emergency and a climate 973	Conserving and enhancing heritage assets is an important part of sustainable development and brings many benefits.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	emergency. We cannot afford much heritage!	 The Local Plan seeks to achieve a balance between meeting housing needs, addressing climate change, conserving and enhancing heritage assets and a number of other matters.
LDCLP/02 Anonymous	 New buildings and modifications to existing buildings should reflect or complement the character of the area. More maps and signage identifying heritage assets could be produced. 	 Respecting and responding to existing character is an important part of good design and is reflected in this policy, the policy on design and the adopted supplementary planning document on design. The Council will consider whether it can do more to present the evidence regarding the Borough's heritage assets in a more accessible way to promote understanding of them.
LDCLP/51 Anonymous	 More understanding and preservation of our heritage than has been advocated is needed. 	 The Local Plan is informed by both the policy requirements set out in the NPPF and an understanding of the Borough's heritage assets. The policy follows the requirement of NPPF. The Council will consider whether it can do more to present the evidence regarding the Borough's heritage assets in a more accessible way to promote understanding of them.
EDCLP/34 Cllr Mary Draycott	 The inclusion of Nottingham Road, Loughborough as a gateway to the town centre with links to industrial heritage. Thousands of people from the railway station use this road and it could be improved with the provision of, for example, flower baskets and more litter bins. 	 Noted – support for objectives of policy is welcomed. The comments regarding public realm improvements are welcomed and will be considered.
EDCLP/74 Mr Hussain	 Identifies a tension between protecting heritage and addressing what are seen as more immediate and pressing concerns of the need for housing, through homelessness and overcrowding, poverty, domestic violence and the impact on mental wellbeing of these and other issues. 	 Conserving and enhancing heritage assets is an important part of sustainable development and brings many benefits. The Local Plan seeks to achieve a balance between meeting housing needs, conserving and enhancing heritage assets and a number of other matters.
EDCLP/80 Historic England	 Historic England promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The historic environment should therefore play a critical role in sustainable development at the heart of all spatial planning work, as reflected within the National Planning Policy Framework (NPPF). We recommend that local authority conservation expertise should be used in relation to all heritage assets. In particular professional archaeological expertise will also be required given the comments raised in relation to archaeology for proposed site allocations; in any case archaeological advice should be sought together with that of your local authority conservation expertise in relation to both local plan policies and all site allocations. 	 Noted and agreed. Noted – heritage and archaeological evidence has formed part of the sustainability appraisal of the plan policies and site allocations. Work is being undertaken to present the results of this work in a more accessible way. Noted – support is welcomed. Noted – wording will be reviewed. Noted – wording will be reviewed.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 The Heritage section within Chapter 7 and LP24 (in particular the first paragraph) are strongly welcomed. Reference to the term non-designated heritage assets should also be included, perhaps within paragraph 7.48. Although the final three paragraphs of LP24 refer to the NPPF, in isolation they are not of sufficient strength and require clarification, particularly with reference to 'harm'. Historic England would be very happy to advise further on detailed wording. 	
EDCLP/86 Rothley Parish Council	 It is important to ensure that the historic views and vistas of this area are protected. To fully appreciate our heritage assets it is important to ensure that their setting is respected. This may include a variety of views of the asset and surroundings and the Local Plan should ensure that they are not compromised. The specific examples of Rothley Court and Rothley Park are given. The parish council would like to see Rothley Court specifically identified in the reasoned justification for the policy. The Sustainability Appraisal report states that 'at Rothley, the potential for negative effects is higher, as development could cut into Rothley Park, which provides the setting for a range of historic assets'. 	 Noted – support for objectives of policy is welcomed. The policy ensures that the settings of heritage assets are considered in planning decisions. The reasoned justification can only provide examples of the Borough's heritage assets. The Council will consider whether the examples are fully representative and whether it can do more to present the evidence regarding the Borough's heritage assets in a more accessible way to promote understanding of them. The draft local plan does not contain any proposals for housing allocations in the vicinity of Rothley Park. The park and the surrounding area are designated as an area of local separation.
EDCLP/96 Marrons on behalf of UCR Construction and Development Ltd	 Points out apparent inconsistencies in wording between policy and its reasoned justification and the National Planning Policy Framework. The apparent inconsistency relates to the test for development that would lead to less than substantial harm to the significance of a designated heritage asset or its setting. The wording in question refers to public benefits and optimum public use. Paragraph 196 of the Framework says that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Draft Policy LP24 should be amended to align with this accordingly. 	 Noted – wording will be reviewed.
EDCLP/108 Sue Barry	Garendon Park should not be built upon.	• A sustainable urban extension of 3,200 homes located to the west of Loughborough formed part of the Core Strategy adopted in 2015 and has received outline planning permission. The development seeks to protect and enhance the heritage assets of the Triumphal Arch and the Temple of Venus within Garendon Park and the park itself and development is directed to the north of the park.
EDCLP/125 Tim Birkinshaw	 Sympathetic re-use of buildings is good. New buildings and modifications to existing buildings near to 	 Noted – support for objectives of policy is welcomed. Respecting and responding to existing character is an important part

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 Iisted buildings should be in a similar or complementing style. We agree broadly with the policy as set out. However we would want the policy to set a two year time period for establishing that no viable use has been found through marketing for a particular asset. 	 of good design and is reflected in this policy, the policy on design and the adopted Supplementary Planning Document on design. The policy on heritage makes clear that the impact on the setting of heritage assets should be a factor in decision making. Noted – support is welcomed. The wording in the policy regarding viable uses reflects that in the National Planning Policy Framework and enables each case to be considered on its own merits.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	The policy is strongly supported.The provisions of the policy should be strictly applied.	 Noted – support is welcomed.
EDCLP/164 Dr S.J. Bullman Storer & Ashby Area Residents Group (SARG)	 It is totally unclear what aspects of "character and appearance" and "local distinctiveness and sense of place" should be maintained and what can be changed when assessing planning applications in a Conservation Area. I have experience of roof tile colour being deemed important for change by enforcement at the building stage, but introduction of window colour (not present anywhere else in an area) being deemed unimportant at the application stage. You need to have much clearer guidelines on this published on your website. 	 Further guidance is provided in the Council's supplementary planning document on design, the Government's National Design Guide and conservation area character appraisals, all of which are material considerations in determining planning applications and should be read alongside the local plan. However, it is important that development proposals are considered in the context of what is locally important. The Council will consider whether additional supplementary planning documents are required to provide guidance on the policies set out in the local plan. These will be set out in the Local Development Scheme and be the subject of public consultation.
EDCLP/165 Dr S.J. Bullman	 It is totally unclear what aspects of "character and appearance" and "local distinctiveness and sense of place" should be maintained and what can be changed when assessing planning applications in a Conservation Area. I have experience of roof tile colour being deemed important for change by enforcement at the building stage, but introduction of window colour (not present anywhere else in an area) being deemed unimportant at the application stage. You need to have much clearer guidelines on this published on your website. 	 Further guidance is provided in the Council's supplementary planning document on design, the Government's National Design Guide and conservation area character appraisals, all of which are material considerations in determining planning applications and should be read alongside the local plan. However, it is important that development proposals are considered in the context of what is locally important. The Council will consider whether additional supplementary planning documents are required to provide guidance on the policies set out in the local plan. These will be set out in the Local Development Scheme and be the subject of public consultation.
EDCLP/187 Jim Smith	• If this section of the draft plan is to have any credibility, then the current framework needs to be followed with more rigour. Example given of requirement to reinstate listed structure which is still outstanding, and which has not been enforced.	 Decisions on planning enforcement are taken in accordance with relevant legislation, the Council's enforcement policy and the Council's scheme of delegation. The enforcement team will investigate all cases that are submitted to it.

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/226 Eleanor Hood	No Comment	Noted
EDCLP/246 Andrew Collis Gladman Developments Ltd	• To ensure full alignment with National Planning Policy and prevent the policy from conflicting with itself, it is recommended that the wording of the first bullet point is amended to read "support development proposals that protect". The current wording requiring development proposals "to protect and enhance heritage assets" is considered to conflict with national planning policy, as set out later in the policy, with regards to the treatment of developments which result in less than substantial harm and substantial harm to heritage assets. Clearly a development resulting in some level of harm to a heritage asset would not pass the first part of the policy under the current wording and as such the latter parts of the policy, as set out in the NPPF could not be applied.	 Noted – wording will be reviewed.
EDCLP/231 CBC Neighbourhoods and Community Well Being	 The Chapter promotes the creation of a high quality and healthy local environment. The conservation, protection and enhancement of all heritage assets should be encouraged, not just those at risk. Increasing public awareness of heritage assets is an important part of preserving and protecting them. There should therefore be a commitment to improving and increasing public access to heritage assets. 	 Noted – support for objectives of policy is welcomed. The policy relates to all heritage assets. Public access cannot be controlled through the planning system. The Council will consider whether it can do more to present the evidence regarding the Borough's heritage assets in a more accessible way to promote understanding of them.
EDCLP/158 Mrs J Brettle- West	 I would like to see Rothley Court specifically identified in paragraph 7.52. To fully appreciate our heritage assets it is important to ensure that their setting is respected. This may include a variety of views of the asset and surroundings and the Local Plan should ensure that they are not compromised. The Sustainability Appraisal report states that 'at Rothley, the potential for negative effects is higher, as development could cut into Rothley Park, which provides the setting for a range of historic assets'. 	 The reasoned justification can only provide examples of the Borough's heritage assets. The Council will consider whether the examples are fully representative and whether it can do more to present the evidence regarding the Borough's heritage assets in a more accessible way to promote understanding of them. Noted – support for objectives of policy is welcomed. The policy ensures that the settings of heritage assets are considered in planning decisions. The draft local plan does not contain any proposals for housing allocations in the vicinity of Rothley Park. The park and the surrounding area are designated as an area of local separation.
EDCLP/239 Jonathon Barratt- Peacock	 Rothley Temple is Grade 1 listed. It is of International importance due to it being the location for the drafting of the bill for the Abolition of Slavery and the earlier use by the Knights Templar. Please could it be added to you list of Grade 1 listed buildings in paragraph 7.44. The parkland setting of Rothley court is equally important and should be protected. 	 The reasoned justification can only provide examples of the Borough's heritage assets. The Council will consider whether the examples are fully representative and whether it can do more to present the evidence regarding the Borough's heritage assets in a more accessible way to promote understanding of them. The draft local plan does not contain any proposals for housing allocations in the vicinity of Rothley Park. The park and the

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
EDCLP/239 Vivienne Barratt- Peacock	 The policy is strongly supported. Rothley Temple is Grade 1 listed. It is of International importance due to it being the location for the drafting of the bill for the Abolition of Slavery and the earlier use by the Knights Templar. Please could it be added to you list of Grade 1 listed buildings in paragraph 7.44. The parkland setting of Rothley court is equally important and should be protected. 	 surrounding area are designated as an area of local separation. The policy ensures that the settings of heritage assets are considered in planning decisions. Noted – support is welcomed. The reasoned justification can only provide examples of the Borough's heritage assets. The Council will consider whether the examples are fully representative and whether it can do more to present the evidence regarding the Borough's heritage assets in a more accessible way to promote understanding of them. The draft local plan does not contain any proposals for housing allocations in the vicinity of Rothley Park. The park and the surrounding area are designated as an area of local separation. The policy ensures that the settings of heritage assets are considered in planning decisions.
EDCLP/252 Leicestershire County Council (Highway Authority)	 Supports the principle that developments should contribute towards the quality of the area and for that to be over the lifetime of the development. Would expect the Local Plan to set out how this is expected to be achieved in practice, in terms of the use of any non-standard materials or items proposed to be used within the public highway (e.g. through the use of commuted sums). 	 Noted – support for the principles of the policy is welcomed. Noted – consultation will take place with the Highway Authority regarding any proposals affecting the public highway including any requirements for developer contributions.
EDCLP/252 Leicestershire County Council Strategic Land	 Policy is seen as sound and meeting the requirements of the NPPF. • 	 Noted – support is welcomed.
EDCLP/272 Centre for Sustainable Energy via Cllr Needham	 The retrofitting of historic and traditional buildings to reduce their energy use is not considered and would benefit from being given a more detailed policy all of its own. An example of a policy, SPD and guidance from Bath and North East Somerset Council were provided. 	 The comments are welcomed and the suggestions will be considered.

POLICY CP1: Retrofitting Existing Buildings – Bath and North East Somerset¹⁰

Retrofitting measures to existing buildings to improve their energy efficiency and adaptability to climate change and the appropriate incorporation of micro-renewables will be encouraged.

Priority will be given to facilitating carbon reduction through retrofitting at whole street or neighbourhood scales to reduce costs, improve viability and support coordinated programmes of improvement. Masterplanning and 'major development' (as defined in the Town & Country Planning (Development Management Procedure (England) Order 2010) in the District should demonstrate that opportunities for the retention and retrofitting of existing buildings within the site have been included within the scheme. All schemes should consider retrofitting opportunities as part of their design brief and measures to support this will be introduced.

Retrofitting Historic Buildings

The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings and buildings of solid wall or traditional construction) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy. The policy will be supported by the Council's Sustainable Construction and Retrofitting Supplementary Planning Document.



https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planni ng-and-Building-Control/Planning-Policy/Sustainable-and-Retrofitting/scrf_adoption_draft_spd.pdf

https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planni ng-and-Building-Control/Planning-Policy/Sustainable-and-Retrofitting/listed building guidance - energy.pdf

Q30 a-c - LP25 - Open Spaces, Sport and Recreation

Do you have any comments on this draft policy?

If you don't agree with the proposed policy please set out why and what alternative approach would you suggest?

Do you think we have missed something?

<i></i>		
DCLP/8	There are barely enough green areas in the local area to service	Comment is noted. The Local Plan is underpinned by an evidence
Mr Corey Taylor	the needs of the current residents let alone thousands more	base which assessed the amounts and types of open space for the
	people!	current population as well as planned growth.

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DCLP/20 Dr Catharine Ferraby	We need more swimming pools!	Comment is noted. Policy will be developed in accordance with the assessment of need.
DCLP/102 and DCLP/105 Mr Dennis Marchant	The policy is supported.	Support for the policy is welcomed.
DCLP/173 County Councillor Max Hunt	 It is essential to address ownership and management of open spaces and recreational areas in more detail and this policy needs to be reviewed in that light. 1. It is not clear whether the use of the term 'our open space' mean that helpen is a the policy of the term 'our open space' mean 	The policy recognises the importance of ownership and management of areas of open space. Consideration will be given to the need to strengthen wording if it is appropriate.
	that belonging to Charnwood BC, or the wider embrace of 'our community'. It may refer only to the Borough Council (and not Parish, Town Council or Management Companies) but this needs to be clear.	The reference to open space includes all public open space, not just that in the ownership of Charnwood Borough Council. Further consideration will be given to the wording on maintenance of open space.
	2. The <i>responsibilities</i> of public open spaces which are owned by Management Companies should be clearer and publicly <i>accountable</i> eg setting standards or regulations. In present circumstances enforcement of maintenance standards as well as others on the Open Spaces Strategy may become costly and not easily put into effect.	Access to privately owned land would require the agreement of a landowner but this can be subject to negotiations as a part of detailed consideration of a planning application.
	3. The access to public open space which is privately owned (eg by a management company and see 7.65) needs to be ensured without the need for litigation or the unnecessary cost of officer time. This is best served by maintaining a record of all public open space, as specified in the original planning consent.	
DCLP/180 Mr Joseph Hall	Requirements for developments to contribute towards open space, sport and recreation facilities is welcome.	Support for the policy is welcome.
DCLP/194 Miss Shirley Dixon	We should be protecting green spaces and farm land and using more brown sites and "other settlements". The loss of wildlife, increase in flooding, struggling services due to large influx of new	The plan's policies on open space were informed by a thorough assessment of provision and need.
	builds needs to be considered.	The plan includes separate policies to protect and enhance the countryside including landscape, countryside, green wedges and areas of local separation and conserving and enhancing biodiversity.
	980	The assessment of sites for development and the plan's policy on flood

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		risk has been underpinned
		by a strategic flood risk assessment.
DCLP/238	Suggest that there should be a commitment to improve access to	Comment is welcomed. The policy for open spaces needs to be read in
Mr John Catt	quiet roads for cycle touring as this is an excellent form of exercise,	conjunction with the policy for sustainable transport which promotes
DCLP/289	particularly for those of mature years. Natural England suggests that this policy should be linked or seen	walking and cycling routes Further consideration will be given to how the plan references green
Natural England	within the context of a wider approach to Green Infrastructure.	infrastructure.
DCLP/372	Outdoor gyms are fun and free but as a top priority we need to	Comments are welcome.
Mr John Barton	make active transport more pleasant and practical.	
DCLP/423	All communities must be healthy. More work required for develop	Comment is welcomed. The policy for open spaces needs to be read in
Mr Martin Smith	cohesive urban and green spaces. More targeting and planning for	conjunction with the policy for sustainable transport which promotes
	an ageing population and a climate emergency	walking and cycling routes.
LDCLP/02	To develop Shepshed's green space's and park with up to date	Comments are welcomed. The policy seeks to protect existing, provision,
Anonymous	equipment. Building more of this to allow all residents to enjoy it More equipment for the OAPs and older teenagers	enhance it where required and provide new provision where it is needed.
LDCLP/22	Some areas should be made "car free" to preserve air quality,	Comment is welcomed. The policy for open spaces needs to be read in
Anonymous	reduce sickness and global warming. We may have to provide	conjunction with the policy for sustainable transport which promotes
	houses we don't have to accommodate cars.	public transport, sustainable, walking and cycling.
LDCLP/51	Encourage less use of the car and everything will follow.	Comment is noted. The policy for open spaces needs to be read in
Anonymous		conjunction with the policy for sustainable transport which promotes
		public transport, walking and cycling.
EDCLP/03	Paths make an important contribution to people's opportunities to	The policy for open spaces needs to be read in conjunction with the
Leicestershire	enjoy informal recreation and take exercise as well as providing	policy for sustainable transport which promotes public transport, walking
Local Access	links to other communities, to other paths and roads, shops and	and cycling. The provision of walking and cycling routes is a key part of
Forum	other facilities. Leisure walking is widespread and we are	this policy.
	increasingly encouraged to use this free facility both for exercise and a means to get out into the countryside for our general health	It is recognised that policy implementation will take place through
	and wellbeing. Walking is inexpensive but a major health benefit.	decisions on planning applications and the involvement of the Local
		Access Forum in discussions is welcome.
	Any development must take note of existing paths (which are not	This is likely to include detailed consideration of layout and maintenance.
	necessarily recorded as right of way) through, beside or near to the	
	site and consider adequate and attractive access points to use	The Borough Council endorses the multi faceted benefits of open space
	them. Cycleways should also be introduced whenever practical and	provision including facilitating more active lifestyles.
	in more rural areas, bridleways. Even where any development	
	cannot provide access to the wider path network due to different	We recognise the many important roles that open space can play and
	ownerships, the design and location of open spaces should be	welcome the comments.
	such that any future link is not precluded	Commente of the Local Access Forum are welcome. We share your
	Paths should not be contained within high fences, nor should they	Comments of the Local Access Forum are welcome. We share your objectives for establishing a well connected network and will work to
	be alongside a hedge which is bound to grow out over the path.	achieve this through the planning system. Accomplishing this will
	Any proposed building near a path should not be of such mass as	however require a number of organisations working together including
		newever require a number of organizatione working together including

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	 to be oppressive. Paths in urban areas should not have dog legs where people can be out of sight as that encourages wrong-doing. Paths should wherever possible be in green corridors making them more attractive but also assisting the migration of wild species. These should link open spaces to the wider countryside where possible. Public open space that is attractive and safe to use can help facilitate more active lifestyles. Green infrastructure is an essential part of any modern development including paths and parks, playing fields and woodland. It should have environmental benefits and facilitate walking and cycling. Trees and shrubs also help remove CO2 and particulates from the air improving public health. We are generally supportive of this draft document which addresses most of our concerns but would expect planning officers to adhere to these guidelines fairly robustly. Ultimately we are looking for well connected walking and cycling routes linking a number of multi-functional open spaces encouraging people to walk rather than drive. 	Leicestershire County Council as highway authority.
EDCLP/71 William Davis Ltd	 WDL supports the additional guidance set out within Table 6 of the DLP. It is considered this provides certainty for both the Council, Private Sector and new residents as to what is expected in terms of developments. However, Table 5 has doubled the requirement for Amenity Green Space and Parks and Gardens required under the extant Core Strategy (1.4Ha per 1000 population against the existing Policy quality standard of 0.78Ha). Having reviewed the supporting Open Spaces Assessment Study, it is unclear and not justified as to why this drastic increase has been applied. The change is not in accordance with stakeholder views as most people surveyed felt that there was enough formal parks and gardens, and access to amenity green space was not considered a priority. In addition the existing Policy guidance being 0.46Ha. It is clear the supply is well in excess of demand giving no justification for altering the Policy. WDL accepts the Study shows an undersupply of Parks across the District as a whole. However, as many areas with an under 	Support for the guidance in Table 6 is welcomed. The standards for open space provision were derived from the Open Space Assessment undertaken by consultants on behalf of the Council. They were then set out in the Borough Council's Open Space Strategy, 2018 - 2036 which was approved by Cabinet in January 2019. Recognising that Parks also function as Amenity Green Space (but not vice versa), it was recommended that a combined standard for these typologies of Open Space was adopted. When combined the current provision in Charnwood for these typologies is 1.35 hectares per 1000 people. This is close to the Fields in Trust (FiT) standard of 1.4 hectares per 1000 when Parks and Amenity Green Space are combined (0.8 ha per 1000 from Parks and 0.6 ha per 1000 from Amenity Green Space). The Council's 2013 standards for Parks and Amenity Green Space (0.32 ha per 1000 for Parks and 0.46 ha per 1000 for Amenity Green Space) is significantly lower than current provision in the borough and the FiT recommendations. For this reason and the close relationship between the two classifications of open space a combined standard is proposed.

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	 provision are within smaller settlements, which have not been allocated any homes within the Draft Plan, it is unclear how the Policy will address the issue as provision will not be made for parks where no homes are to be built. Therefore, it can be accepted there is no clear need for doubling the provision of such spaces; and the application of the Policy would ultimately not be in conformity with the NPPF's requirement to make effective use of land (Paras 117 and 118 refer.) Furthermore, the evidence base Study notes that achieving an increased quantity of open space in the more urban areas is extremely difficult as it conflicts with the delivery of much needed homes in otherwise sustainable locations (para 7.8.) Moreover, the Viability Assessment has not tested the quantum of delivering this increased provision. The evidence base applies the Fields in Trust (FiT) standard without providing any supporting viability study. 	From a planning perspective, a combined standard for Parks and Amenity Green Space offers flexibility for development management to provide open spaces that are suited to the specific needs and requirement of the site. The policy expresses the Borough Council's intention to protect, enhance and where appropriate provide for new open space. The Local Plan will be subject to a viability assessment which will consider all of the policies therein.
EDCLP/74 Mr Hussain	 Why is the borough unnecessarily opening up competition for the sports and recreational centres? These current businesses need to be given the fullest opportunity to develop and thrive, you have to ask yourself, are these sports centres already fully occupied during the course of the opening hours and if not, then why not? This endeavour fails to override the immediate needs of adequate housing. Sports centres and fitness centres can be created as and when healthier minds prior exist. Remove the mentally challenging environment in which people are being forced to live in prior to even thinking about opening parks & relevant facilities. The insanity of it baffles me! None of this actually matters today does it? Absolutely none of it! Stop wasting our money and follow through with high quality time binding efficiencies for family life in order for families to lead a more productive and meaningful way of life. Housing is the cure to much of society's problems, understand that! 	Comments are noted.
EDCLP/95 Barrow Upon	Draft Policy LP 25 does not address Local Green Spaces which may be designated because of their beauty, historic significance,	Comments are noted. The scope for referencing open space identified in Neighbourhood Plans will be considered.
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Soar Parish Council	tranquillity or richness of its wildlife as well as recreational value. The Draft Charnwood Local Plan 2019-36 should take steps to ensure that Draft Policy LP 25 is aligned or refer to Neighbourhood Plan Policy BuS5.	
EDCLP/108 Sue Barry	There could be spaces, which are instead of new housing development spaces community gardens, garden areas in town, more park areas, open areas for children to play sport etc. Put on fun how to get healthy, eat healthy courses.	Comments are noted.
EDCLP/115 Charnwood Constituency Labour Party	Ownership of green space to be passed to the authority and managed in a manner designed to enhance biodiversity.	Reference to management and maintenance is included within the draft policy. While the Borough Council will become responsible for the management and maintenance of many areas of local open it would not be appropriate to be prescriptive in the policy as this will need to be considered in case by case basis so that the most appropriate arrangements are set in place for each development.
EDCLP/121 Marie Birkinshaw	Timescale of commitments is vital for both nature and humans – the time to act and get people actively involved is now.	The local plan sets out a strategy for development over a timescale to 2036 while recognising that decisions made now will affect the Borough over this timescale.
EDCLP/125 Tim Birkinshaw	Open spaces, especially play areas, should be central to developments (not peripheral as is often the case) to provide a better sense of community to new developments. Facilities for new developments must also provide for existing areas where amenities may be lacking; this will help integration of old with new.	Comments are welcomed. The inclusion of areas of open space is an integral part of the development process and our standards will be provide the basis for that provision
EDCLP/130 Lee Perkins	Ownership of green space to be passed to the authority and managed in a manner designed to enhance biodiversity.	Reference to management and maintenance is included within the draft policy. While the Borough Council will become responsible for the management and maintenance of many areas of local open it would not be appropriate to be prescriptive in the policy as this will need to be considered in case by case basis so that the most appropriate arrangements are set in place for each development. The plan also contains policy on conserving and enhancing biodiversity
EDCLP/134 RCA Regeneration Limited on behalf of Mr and Mrs Gamble	We are broadly supportive of this policy, and in particular are of the view that more natural areas of play should be supported within new housing schemes, in order to minimise the impact on the established character and appearance of the area.	and geodiversity. Support for the policy is welcomed.
EDCLP/143	We consider that the council should be pro-active in these	Charnwood Borough Council will implement this policy through

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CPRE Leicestershire and its Charnwood District Group	endeavours. Another CPRE concern is the lack of national designations to protect the countryside of both Leicestershire and Charnwood. There are no Green Belts, National Parks or ANOBs in the county and within Charnwood only a number of SSSIs and relatively small National Nature Reserves are protected. Accordingly CPRE consider that the Local Plan should emphasise policies which enhance protection of the countryside, biodiversity and green spaces.	development management decisions. The Local Plan includes a policy on landscape, countryside, green wedges and areas of local separation aswell as a separate policy on conserving and enhancing biodiversity and geodiversity. These are also important policies which will help shape development decisions.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	The Parish Council very strongly supports the Local Plan policies as drafted in connection with Healthy Communities, Open Space, Sport and Recreation, Indoor Sports Facilities and the Protection of Community Facilities. The very important provisions and priorities identified - which must be strictly applied in order to protect the Borough's environmental assets and the health and well-being of Charnwood's communities. The Parish Council particularly welcomes the introduction of the new policy on Tree Planting and trusts that the Borough Council will lead on this in a big way.	The support of Mountsorrel Parish Council is welcomed.
EDCLP/178 Mark Rose Define obo Bloor Homes	The provision of an appropriate quantum and type of open space in association with development is supported. However, the NPPF (para. 96) requires Local Plan policies to determine what provision is needed based on a robust and up to date assessment of the local need for open space, that identifies deficits and surpluses in existing provision and takes account of opportunities for new provision. The Charnwood Local Plan must, therefore, clearly set out all of the requirements, and in respect of off-site provision, the mechanism(s) for securing the required contributions so that developers can proceed with some certainty and ensure that the required development is not unnecessarily delayed.	 We welcome support for the inclusion of an appropriate quantum and type of open space within the policy. Full details of the assessment of local open space are contained within the Open Space Assessment Study, 2017. This study informed the Borough Council's Open Spaces Strategy, 2018. It is a robust and up to date assessment of the local need for open space, that identifies deficits and surpluses in provision. A whole plan viability study will be undertaken to assess the cumulative impact of policy requirements upon viability and deliverability.
	However, it is not helpful to seek to apply blanket requirements for a variety of very specific types of open space to each and every site. Instead guidance is required that encourages proposals to respond to both the strategic context and existing (or proposed) provision, and the specific nature of the site. The provision of multi- functional spaces that respond to a variety of needs should be encouraged. With this objective in mind, the provision should be established by local standards based on a robust and up to date assessment of the local need for open space and sports and recreation facilities, taking account of deficits and surpluses in existing provision (although it is not for new developments to	

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EDCLP/179	 remedy existing shortfalls in provision). Again, the requirements of Policy 25 will be key in ensuring that the viability and deliverability of sustainable development schemes and the CLP overall is not undermined by unduly onerous cumulative policy requirements (i.e. other infrastructure and specific housing requirements). The provision of an appropriate quantum and type of open space in 	We welcome support for the inclusion of an appropriate quantum and
And Rose Define obo Bloor Homes (HS37)	 The provision of an appropriate quantum and type of open space in association with development is supported. However, the NPPF (para. 96) requires Local Plan policies to determine what provision is needed based on a robust and up to date assessment of the local need for open space, that identifies deficits and surpluses in existing provision and takes account of opportunities for new provision. The Charnwood Local Plan must, therefore, clearly set out all of the requirements, and in respect of off-site provision, the mechanism(s) for securing the required contributions so that developers can proceed with some certainty and ensure that the required development is not unnecessarily delayed. However, it is not helpful to seek to apply blanket requirements for a variety of very specific types of open space to each and every site. Instead guidance is required that encourages proposals to respond to both the strategic context and existing (or proposed) provision, and the specific nature of the site. The provision should be encouraged. With this objective in mind, the provision should be established by local standards based on a robust and up to date assessment of the local need for open space and sports and recreation facilities, taking account of deficits and surpluses in existing provision (although it is not for new developments to remedy existing shortfalls in provision). Again, the requirements of Policy 25 will be key in ensuring that the viability and deliverability of sustainable development schemes and the CLP overall is not undermined by unduly onerous cumulative policy requirements (i.e. other infrastructure and specific housing requirements). 	 type of open space within the policy. Full details of the assessment of local open space is contained within the Open Space Assessment Study, 2017. This study informed the Borough Council's Open Spaces Strategy, 2018. It is a robust and up to date assessment of the local need for open space, that identifies deficits and surpluses in provision. A whole plan viability study will be undertaken to assess the cumulative impact of policy requirements upon viability and deliverability.

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EDCLP/200 Ian Dickinson Canal & River Trust	An explicit reference to the role that the canal and its towpath can play should be acknowledged within the list set out in paragraph 7.57.	We welcome the comments of the Canal and River Trust in advocating the potential of the Grand Union Canal / River Soar Navigation can play as a green corridor.
	'Green corridors' can also include waterways and towpaths. The versatility and multi-functional nature of the waterway means that it can also fulfil a role as an amenity green space, a semi-natural green space and an opportunity to engage in outdoor sports and recreational activity (such as rowing or canoeing).	
	Draft Policy LP25 should therefore specifically identify the role the canal and towpath can play in contributing towards healthier and more active lifestyles.	
	New development should always be required to consider how it can help to maximise opportunities for people to pursue healthier and more active lifestyles. The Grand Union Canal/River Soar Navigation can play a valuable role in encouraging people to be more active, and new development proposals in proximity to the canal corridor should consider whether there is scope to create or enhance links to the canal or contribute towards improvements to the canal, such as upgrading towpath surfaces, in order to encourage its greater use as a resource for the whole community.	
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	A mapping exercise should be done to calculate the amount of green corridors needed in Table 5.	Full details of the assessment of local open space is contained within the Open Space Assessment Study, 2017. This study informed the Borough Council's Open Spaces Strategy, 2018. It is a robust and up to date assessment of the local need for open space, that identifies deficits and surpluses in provision.
EDCLP/226 Eleanor Hood	Again your aims are too weak. It should state 'we WILL protect' not 'seek to protect'	The wording reflects a clear policy presumption that existing open space will be protected.
EDCLP/231 CBC Neighbourhoods and Community Well Being	We welcome Draft Policies LP 19 – LP28 which support the aims and objectives of the Council's adopted Open Space, Playing Pitch and Indoor Built Sports Facilities Strategies. The Chapter promotes the creation of a high quality and healthy local environment and the inclusion of specific Charnwood Forest/National Forest (LP 20), Biodiversity (LP 22) and Tree Planting (LP 23) Policies are welcomed and supported.	Support for the policy is welcome. We will review whether the balance of wording between indoor and outdoor sport is appropriate and ensure that the evidence is accurately reflected in policy.
	Policy on Outdoor Sport is insufficient in comparison with Open Space and Indoor Sport. We recommend a specific Policy relating 987	

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	to Outdoor Sport to reflect the broad range of provision and importance to the health and wellbeing of Charnwood Residents. We would expect reference to the Council's adopted Playing Pitch Strategy within this Policy. Table 5 - Outdoor Sports Facilities Quantity – to be calculated using Pitch Calculator, local priorities and the Playing Pitch Strategy. Indoor Sports Facilities Quantity – to be calculated using Facility Calculator, local priorities and the Indoor Built Sports Facility Strategy. Para 7.61 and Table 6 - Indoor and Outdoor Sport should be identified separately and not just generic 'sports facilities. The expectation is that all developments over 10 dwellings will be required to contribute towards Indoor and Outdoor Sports provision	
EDCLP/230 Leicestershire and Rutland Bridleways Association	We would like to see Public Rights of Way specifically included in the Green Corridors. (Also see Q24 LP19 above.)	Walking and cycling routes are referred to in the Local Plan's policy on Sustainable Transport, but public rights of way are a particular designation which may merit more explicit policy reference in the plan.
EDCLP/192 Severn Trent Water	 Whilst Severn Trent are generally supportive of the creation and protection of open spaces, sport and recreation, we would note that policy should be written in a way that it does not restrict flood alleviation schemes from being carried out. In urban areas suitable locations for sustainable and resilient flood alleviation schemes can be limited, open spaces can provide suitable land for flood alleviation schemes to be constructed within. In a number of cases where the right solution is utilised it is also possible to provide benefits through enhanced biodiversity and amenity within the open space. We would therefore recommend that a paragraph is added to the Safeguarding section of Policy LP 25 Open Spaces, Sport and Recreation, to the effect of <i>"Flood alleviation schemes within areas of open space will generally be supported provided that they do not have an adverse impact on the primary function of the open space."</i> 	Comment is welcome and the addition of new wording will be considered during the review of the plan.
EDCLP/190 Sport England	Summary Seeks clarification that the reference to local priorities in Table 5 are the local priorities which are identified in the playing pitch strategy.	Our work in assembling the evidence base was thorough and comprehensive. We will ensure that the plan shows a clear link from the evidence to the expression of policy in the plan and will consider all the issues raised in reviewing the wording of the plan.

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CONCOLICE	In accordance with NPPF para 96 it is important to keep he evidence robust and up to date	
	Draft Policy LP 25 – Sport England supports the principle of protect enhance and provide but concern expressed that there is a reference to an assessment of need and unsure how this relates to the playing pitch strategy and the indoor built sports facilities strategy.	
	Questions whether there is a need for para 7.66 be repeated for the PPS i.e. priorities and action plan?	
	With respect to the creation of more active places in new development (para 4.40) draft policy LP2 (and also cross ref with draft policy LP 25) Sport England calls for reference to be made 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.	
	Sort England calls on the Council to embrace the concept of 'Active Design' as Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of major new housing and mixed use development schemes has a vital role in providing easy access to a choice of opportunities for sport and physical activity, making new communities more active and healthy. Active Design is aimed at urban designers, master planners and the architects of our new communities. The guidance promotes sport and activity through three key Active Design principles of - improving accessibility, enhancing amenity and increasing awareness (see link below for more information) The document can be downloaded via the following link: http://www.sportengland.org/activedesign	
	Open space type – outdoor sports facilities - are the local priorities those which are identified in the playing pitch strategy should this be referenced.	

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EDCLP/159 C.Mulvaney	I welcome the Council's plan for supporting active lifestyles but I think it could go further. Providing cycle paths should be a statutory part of any new development plan and will encourage cycling, and thus increase the opportunities for an active lifestyle. If cycle paths are added to all new developments, it will become ingrained over time as a serious alternative form of sustainable transport.	The draft policy on Sustainable Transport states that we will require all major developments to provide walking, cycling and public transport access to key facilities and services. The policy also states that we will work with our partners to prepare a Local Cycling and Walking Infrastructure Plan.
EDCLP/239 Vivienne Barratt- Peacock	More allotment space needed. Allotments in Rothley are too far for many villagers to access.	Allotment space needs will have regard to the Open Space Assessment, 2017 and the Borough Council's Open Space Strategy, 2018.
	Would love to see an outdoor swimming pool in Charnwood. We travel to Ashby de la Zouch which is a long way to go!	The assessment of swimming pool provision will have regard to Sport England's Sports Facility Calculator, local priorities and the Council's evidence base studies.
DCLP 266 Leicester City Council	Para 7.63 The City Council would welcome recognition of the potential for cross-boundary solutions to outdoor facilities and sports provision that avoid duplication and promote the sustainability of any provision	Leicester City Council's recognition of the importance of cross boundary working is welcome.
EDCLP/252 Leicestershire County Council	Feel policy does not sufficiently take into account the wider health issues. Open space in itself will not support people's health and wellbeing. The quality of that open space and the available facilities is also an important factor as is the environment within which it is set especially in terms of air quality.	The comment is welcome but the draft policy does refer to healthier and more active lifestyles and the actions that can be taken to achieve this.
EDCLP/252 Leicestershire County Council	Replace 'Providing appropriate landscaping and a landscape scheme' with 'Providing appropriate and practical landscape design solutions that reflect the identity and quality of place whilst meeting the current and future needs of the stakeholders in a sustainable and creative way'.	Suggested wording change will be considered during plan preparation.
EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	Support for the policy is welcome.
DCLP 266 Leicester City Council	The City Council considers that contributions may sometimes be required to offset the impact of development near to the City boundary upon open spaces, sport and recreation provision within the City. The relative chronological alignment of our Plans may present an opportunity to better co-ordinate planning for open spaces, sport and recreation provision either side of our common boundary.	We would welcome further discussions with the City Council as to how such cross boundary funding would work in practice.
DCLP 266 Leicester City Council	The City Council suggests that this draft Policy or its supporting text encourage the creation of high quality cycle links between recreational networks and facilities. Such links should be well lit,	The policy should be read in conjunction with the policy for sustainable transport.

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Q30 d - LP25 - Op In addition, are th If so, please prov		at you consider have a special importance for your local community? storical significance, recreational value, tranquillity or importance for
wildlife. DCLP/194 Miss Shirley Dixon	The land at the Ridgeway / behind the Garland in Rothley contains so much wildlife and beauty	Your comments on the wildlife value of this site are noted.
LDCLP/02 Anonymous	Little Haw Lane, Glenmore Park and Oakley Road park [Shepshed] have special importance.	Your comments on the value of these sites are noted.
LDCLP/51 Anonymous	Everywhere that has no concrete on it now needs keeping that way for the next 10 years and then have a new review after regenerating all our under used brown field sites.	Protecting and enhancing our natural, built and historic environment is one of the objectives of the plan but this needs to balanced with other objectives in achieving sustainable development. We support the redevelopment of brownfield land but development needs will mean that some greenfield land will also be needed.
EDCLP/77 Nanpantan Ward Residents' Group	 Propose that HS33 should become a Local Green Space because being the last open space in the area, if HS33 is developed for housing the Council will not now, or in the future, be able to meet the open space standards for Nanpantan Ward as specified in the Open Spaces Strategy. The opportunity will be forever lost to provide the benefits listed in the Strategy, including safeguarding physical and mental health, wellbeing, biodiversity and the mitigation of climate change. Nanpantan Ward Residents' Group wish to work under the National Planning Policy Framework with Charnwood Borough Council and Charnwood Planning Services to get HS33 re-designated as Local Green Space. The immediate action required is to remove HS33 from the Local Plan as a site for development and to identify it instead as potential open space. The three propositions in the following formal argument are supported by evidence in the three Appendices to this document: Nanpantan Ward has a significant deficit of open space HS33 is the last remaining space in the area that could become open space Charnwood Borough Council follows its Open Spaces Strategy Having been made aware of this matter, we are sure Charnwood Borough Council (CBC) would not countenance deliberately 	The selection of sites for residential development was the outcome of a robust evidence based Process, subject to sustainability appraisal, which considered how the sites aligned with social, economic and environmental objectives. The Borough Council's Open Space Assessment identified low levels of provision within Nanpantan Ward but the ward is located on the edge of the urban area and in close proximity to significant open space assets, most notably the Outwoods. Our Open Space Strategy states that open space standards have been used as the basis for assessing current shortfalls in provision and will be used as the basis for open space provision as part of new developments.

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CONCOLICE	depriving local residents of the only remaining open space in the area and must act to withdraw HS33 from the list of potential sites for housing development in the Local Plan.	
	Instead this field should be identified to address the local shortfall in open spaces and both CBC and Charnwood Planning Services are hereby invited to work with Nanpantan Ward Residents' Group (NWRG) to act towards getting HS33 designated as Local Green Space.	
	The NWRG has already started work supported by the Open Spaces Society with a view to applying for a Local Green Space designation for HS33 under the National Planning Framework.	
	NWRG is aware that we need to work with the current owners of HS33, but HS33 can be demonstrated to meet easily the three requirements for designation as Local Green Space in that it is:	
	a) reasonably close proximity to the community it serves HS33 is centrally located in the Ward.	
	b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; the land is bordered by Burleigh Wood, has long views across Loughbrough and the Outwoods, and is regularly visited by badgers, muntjacs, barn owls, foxes and bats. It also frequently used by dog walkers, walkers and, weather permitting, its large hill is used for sledging by hundreds of children (and parents)	
	c) local in character and is not an extensive tract of land. the hill is on ancient volcanic rock characteristic of the Charnwood Forest [6], borders the ancient woodland that is Burleigh Wood and the site is only 1.4 ha in area.	
	We are aware that CBC will be looking for partners to help with the purchase and ongoing management of HS33 as an open space. To start this process, NWRG has been in contact with Joanna Herbert Stepney Charitable Settlement who is a land owner and philanthropist in the area and Loughborough University who manage land bordering HS33. We are also aware of policy	

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	 statement 1(f) in the Open Spaces Strategy and NWRG is willing to work with CBC to 'explore and co-ordinate all investment opportunities in our open spaces including Heritage Lottery Funding, Sport England, etc.' The NWRG understands that the timescale might be too short for Local Green Space designation to be achieved before the current Local Plan is finalised. However, removing HS33 from the Local Plan as potential site for development and identifying it instead as potential open space would signal CBC's support in principle and help us in achieving Local Green Space designation in the medium term. 	
EDCLP/112 David Mulvaney	The Council is obliged to designate HS33 as open space Being the last open space in the area, if HS33 is developed for housing the Council will not now, or in the future, be able to meet the open space standards for Nanpantan Ward as specified in the Open Spaces Strategy. The opportunity will be forever lost to provide the benefits listed in the Strategy, including safeguarding physical and mental health, wellbeing, biodiversity and the mitigation of climate change. The immediate action required is to remove HS33 from the Local Plan as a site for development and to identify it instead as potential open space. Argument showing HS33 must become open space The three propositions in the following formal argument are supported by evidence in the three Appendices to this document. 1. Nanpantan Ward has a significant deficit of open space 2. HS33 is the last remaining space in the area that could become open space 3. Charnwood Borough Council follows its Open Spaces Strategy So, only by making HS33 open space can Open Spaces Strategy standards ever be met For HS33 to become open space, Nanpantan Ward Residents' Group will work together with Charnwood Borough Council and others to get HS33 re-designated as Local Green Space. The first step is to identify HS33 as potential open space in the Local Plan.	The selection of sites for residential development was the outcome of a robust evidence based Process, subject to sustainability appraisal, which considered how the sites aligned with social, economic and environmental objectives. The Borough Council's Open Space Assessment identified low levels of provision within Nanpantan Ward but the ward is located on the edge of the urban area and is in close proximity to significant open space assets, most notably the Outwoods. Our Open Space Strategy states that open space standards have been used as the basis for assessing current shortfalls in provision and will be used as the basis for open space provision as part of new developments.
EDCLP/121 Marie Birkinshaw	Site HS18 should be marked as a green space/urban woodland. Currently used as horse grazing with the lower part as a builders yard, this area is former agricultural land with adjacent land	We welcome your comments about the site informed by your local knowledge. The selection of sites for residential development was the outcome of a
	previously being brick pits then a tip. It also contained the ditch and	robust evidence based

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	bank of a previous deer park. It is currently a pedestrian and cyclists thoroughfare and a real last refuge for nature (particularly for Red List sparrows and also for other species including badgers). Recent development work down Cross Hill Lane has had a serious impact on nature in this area already and observation in local gardens has shown this to be the case with more badger activity in the gardens. As a school route and view across the town this is a beautiful place and it would be a real pity if it were lost to housing development. It could usefully be made into a nature reserve and promoted as such. In an earlier Local Plan part of this area was earmarked as a local green space. It would be an ideal area for urban woodland as there is a small area of woodland adjacent. The current Local Plan consultation document mentions this area as a wildlife corridor and there are also access problems for cars which	process subject to sustainability appraisal which considered how the sites aligned with social, economic and environmental objectives. The plan will seek to protect wildlife rich habitats and wider ecological networks and any development application coming forward would need to take this fully into account.
EDCLP/125 Tim Birkinshaw	 would need to be clearly and objectively addressed. The site between Cross Hill Lane, Beacon Road and Parklands Drive gardens (earmarked in a previous Local Plan for recreational land) would be an excellent site for an urban wood and wildlife area, available for local recreation. The side already has a wooded area and contains establish hedges. Part of the site had been used as a tip, so is unsuitable for building land. The current use as a builder's yard takes only a fraction of the space. Mucklin Wood (an ancient woodland) and the adjacent lanes (to Beaumanor and Woodthorpe) could be an important 'urban lung' for south Loughborough. The lanes are well-used by walkers, 	We welcome your comments about the site informed by your local knowledge. The selection of sites for residential development was the outcome of a robust evidence based process subject to sustainability appraisal which considered how the sites aligned with social, economic and environmental objectives. The plan will seek to protect wildlife rich habitats and wider ecological networks and any development application coming forward would need to take this fully into account.
EDCLP/132 Elizabeth Mulvaney	 cyclist and horse-riders. Adjacent parkland with ancient trees could be included. HS33 should be designated as open space I have grown up in the middle of Nanpantan Ward, near HS33. There are small open spaces at the east of the Ward, too far for children living near me to walk to safely. Apart from HS33, there are no open spaces in the centre or to the west of Nanpantan. If HS33 is developed, the last opportunity to provide open space in 	The selection of sites for residential development was the outcome of a robust evidence based process subject to sustainability appraisal which considered how the sites aligned with social, economic and environmental objectives. The Borough Council's Open Space Assessment identified low levels of provision within Nanpantan Ward but the ward is located on the edge of
	this part of the Ward will be lost. I understand there is pressure to provide more housing, but should this be at the expense of the health and wellbeing of the children in 994	the urban area and is in close proximity to significant open space assets, most notably the Outwoods. Our Open Spaces Strategy states that open space standards have been

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	the area? If HS33 makes it into the local plan as a site to be developed, I would be interested to know how this can be justified given the lack of open space.	used as the basis for assessing current shortfalls in provision and will be used as the basis for open space provision as part of new developments.
EDCLP/134 RCA Regeneration Limited on behalf of Mr and Mrs Gamble	We are broadly supportive of this policy, and in particular are of the view that more natural areas of play should be supported within new housing schemes, in order to minimise the impact on the established character and appearance of the area.	We welcome your support.
EDCLP/141 Dr Paul Lepper	Development of Site HS33 in the Nanpantan area would further exacerbate an exist major shortfall in greenspace provision in this area. There has already been work done in conjunction with the Open Spaces Society to designate this space for inclusion Local Green Space designation for HS33 under the National Planning Framework published by the Department for Communities and Local Government. Removal of this space from potential for housing development would allow this process to continue. This space is one if not last remaining open spaces in this ward and within a few meters of a major residential area potentially providing a much needed open space designation.	 The selection of sites for residential development was the outcome of a robust evidence based process subject to sustainability appraisal which considered how the sites aligned with social, economic and environmental objectives. The Borough Council's Open Space Assessment identified low levels of provision within Nanpantan Ward but the ward is located on the edge of the urban area and is in close proximity to significant open space assets, most notably the Outwoods. Our Open Spaces Strategy states that open space standards have been used as the basis for assessing current shortfalls in provision and will be used as the basis for open space provision as part of new developments.
EDCLP/159 C.Mulvaney	I am sure Charnwood Borough Council (CBC) would not countenance depriving Nanpantan residents of the only remaining open space in the area and must act to withdraw HS33 from the list of potential sites for housing development in the Local Plan. Instead this field should be identified to address the local shortfall in open spaces and both CBC and Charnwood Planning Services should work with Nanpantan Ward Residents' Group (NWRG) to act get HS33 designated as Local Green Space. The National Planning Policy Framework allows Local Green Space to be designated through a Local Plan. We would like to work with CBC to include HS33 as Local Green Space in the Local Plan. HS33 can be demonstrated to meet easily the three requirements for designation as Local Green Space: a) reasonably close proximity to the community it serves HS33 is centrally located in the Ward. b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic	 The selection of sites for residential development was the outcome of a robust evidence based process subject to sustainability appraisal which considered how the sites aligned with social, economic and environmental objectives. The Borough Council's Open Space Assessment identified low levels of provision within Nanpantan Ward but the ward is located on the edge of the urban area and is in close proximity to significant open space assets, most notably the Outwoods. Our Open Spaces Strategy states that open space standards have been used as the basis for assessing current shortfalls in provision and will be used as the basis for open space provision as part of new developments.

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	significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; the land is bordered by Burleigh Wood, has long views across Loughbrough and the Outwoods, and is regularly visited by badgers, muntjacs, barn owls, foxes and bats. It also frequently used by dog walkers, walkers and, weather permitting, its large hill is used for sledging by hundreds of children (and parents) c) local in character and is not an extensive tract of land. the hill is on ancient Cambrian rock characteristic of the Charnwood Forest, borders the ancient woodland that is Burleigh Wood and the site is only 1.4 ha in area. If this opportunity is lost to maintain HS33 as an open space, the Council will not now or in the future be able to meet the appropriate level of provision specified in the Open Spaces Strategy for the Nanpantan Ward. This would be a failure to meets its obligations and be a disservice to the health and wellbeing of its residents. We are sure CBC will act to avoid this.	
EDCLP/239 Jonathon Barratt- Peacock	 Fields between Templar Way, Westfield Lane, The Ridgeway and West Cross Lane are heavily used for walking by local people, and there are beautiful far reaching rural views and an open aspect with ancient trees line the site. The active badgers setts, 4 varieties of bat, rare birds such as skylarks and barn owls inhabit this area and should be protected. The woodland along the north of Westfiled Lane is part of the ancient parkland of Rothley Court and has historic significance as part of the setting of Rothley Court. Part was also used as a water garden for Rothley Court. Both sides of Westfield Lane form the setting of Rothley Court and the ancient trees lining both sides of the route and surrounding the cricket pitch are very much valued by the community. The small woodland behind Breech hedge offers an important habitat for wildlife. 	We welcome your comments about the site informed by your local knowledge. The selection of sites for residential development was the outcome of a robust evidence based process subject to sustainability appraisal which considered how the sites aligned with social, economic and environmental objectives. The plan will seek to protect wildlife rich habitats and wider ecological networks and any development application coming forward would need to take this fully into account.
EDCLP/239 Vivienne Barratt- Peacock	Fields between Templar Way, Westfield Lane, The Ridgeway and West Cross Lane are heavily used for walking by local people, and there are beautiful far reaching rural views and an open aspect with ancient trees line the site.	We welcome your comments about the site informed by your local knowledge. The selection of sites for residential development was the outcome of a robust evidence based
	The active badgers setts, 4 varieties of bat, rare birds such as skylarks and barn owls inhabit this area and should be protected.	process which was subject to sustainability appraisal which considered how the sites aligned with social, economic and environmental

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	The woodland along the north of Westfiled Lane is part of the ancient parkland of Rothley Court and has historic significance as part of the setting of Rothley Court. Part was also used as a water garden for Rothley Court. Both sides of Westfield Lane form the setting of Rothley Court and the ancient trees lining both sides of the route and surrounding the cricket pitch are very much valued by the community. The small woodland behind Breech hedge offers an important habitat for wildlife.	objectives. The plan will seek to protect wildlife rich habitats and wider ecological networks and any development application coming forward would need to take this fully into account.
EDCLP/252 Leicestershire County Council	Feel policy does not sufficiently take into account the wider health issues. Open space in itself will not support people's health and wellbeing. The quality of that open space and the available facilities is also an important factor as is the environment within which it is set especially in terms of air quality.	We welcome your comments. The Draft Policy emphasises healthier and more active lifestyles. In addition we have commissioned further work on air quality to provide evidence for our policies.
EDCLP/252 Leicestershire County Council	Providing appropriate landscaping and a landscape scheme should be replaced with: Providing appropriate and practical landscape design solutions that reflect the identity and quality of place whilst meeting the current and future needs of the stakeholders in a sustainable and creative way.	We appreciate your suggested wording change and will take this into account as we develop the plan.
EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	We welcome your comment.
Do you have any o If you don't agree	or Sports Facilities comments on this draft policy? with the proposed policy please set out why and what alternative nave missed something?	e approach would you suggest?
DCLP/8 Mr Corey Taylor	I cannot tell you where you can find space for 223 houses in the local area, but even if I could, the reasons the development was refused planning permission were countless, this type and size of development in this area is just not sustainable.	
DCLP/423 Mr Martin Smith	More facilities are required, and existing maintained	Comments are noted.
LDCLP/02 Anonymous	Shepshed does not have a public leisure centre so should make sure Shepshed has access to a large indoor hall for sports.	The provision of new indoor sports facilities will depend on needs, priorities, resources and opportunities. Considerations of scheme viability would also need to be taken into account as part of the planning process.
LDCLP/51	Start to get people out of their cars and walking then we can start to	The provision of indoor sports facilities is one aspect of the promotion of

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Anonymous	see where facilities need to be provided.	healthier lifestyles. Our policy on Sustainable Transport will promote walking and cycling.
EDCLP/52 Shepshed Town Council	How will the Borough Council provide indoor sports facilities in Shepshed? At present, such facilities are very limited, particularly compared with the ever-increasing population in our town.	The provision of new facilities in Shepshed will be evidence based and depend upon suitable development opportunities arising.
EDCLP/74 Mr Hussain	Love the idea of it, squash, badminton etc but, before we commence with ripping up our environment to accommodate this, shall we ask the homeless, the domestic abuse victims, the families that are living in overcrowded and squalid conditions if any of them are mentally up for a game of badminton prior to or, after visiting a local foodbank? Hope that that helps you to place a better perspective on things that clearly have a much higher priority than anything else.	Comments are welcome. The local plan seeks to achieve sustainable development and this includes the need to address the Borough's housing needs.
EDCLP/108	#Housings1st badminton after! Plenty of these.	Comment is noted.
Sue Barry		
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We broadly agree with the policy and the importance of providing accessible indoor sports facilities.	Comment is welcome.
EDCLP/147 Hoton Parish Council	Have you considered the contingency for loss of indoor and outdoor sports facilities that has already taken place, particularly those associated with schools?	Our evidence does take into account the loss of facilities, where it is possible to do so, including those associated with schools.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	 The Parish Council very strongly supports the Local Plan policies as drafted in connection with Healthy Communities, Open Space, Sport and Recreation, Indoor Sports Facilities and the Protection of Community Facilities The very important provisions and priorities identified - which must be strictly applied in order to protect the Borough's environmental 	Comments are noted
EDCLP/178 Mark Rose Define obo Bloor	assets and the health and well-being of Charnwood's communities. Policy LP 26 refers to the use of developer contributions to facilitate off-site provision, though there is no indication within the policy as to how the need for the contributions will be established. Notably,	Agreed that developer contributions cannot be used to remedy existing shortfalls.
Homes	new developments should not be required to remedy shortfalls in provision or indeed contribute to the provision of facilities where there is sufficient capacity available.	The Borough Council has established a substantial evidence base which identified needs and priorities. The intention would be to use the Indoor Built Facilities Strategy and Action Plan (2018) to help inform plans for

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	Moreover, if it is indeed required, then there is no indication how the funds calculated using the Sport England Facility Calculator would be utilised to deliver the required improvements where they are needed. These omissions need to be addressed to ensure that the requirements meet the tests established in the 2010 Community Infrastructure Levy Regulations (necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind). Clearly, the requirements of Policy LP 26 will be also key in ensuring that the viability and deliverability of sustainable development schemes and the CLP overall is not undermined by unduly onerous cumulative policy requirements (i.e. other	provision in a local area. This can inform negotiations with developers so that when a generalised need is identified through the Sports Facilities Calculator then the evidence can provide finer grained detail. Draft Polcy LP26 refers to viability and this would also be part of policy implementation.
EDCLP/179 Mark Rose Define obo Bloor Homes (HS37)	 infrastructure and specific housing requirements). Policy LP 26 refers to the use of developer contributions to facilitate off-site provision, although there is no indication within the policy as to how the need for the contributions will be established. Notably, new developments should not be required to remedy shortfalls in provision or indeed contribute to the provision of facilities where there is sufficient capacity available. Moreover, if it is indeed required, then there is no indication how the funds calculated using the Sport England Facility Calculator would be utilised to deliver the required improvements where they are needed. These omissions need to be addressed to ensure that the requirements meet the tests established in the 2010 Community Infrastructure Levy Regulations (necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind). 	Agreed that developer contributions cannot be used to remedy existing shortfalls. The Borough Council has established a substantial evidence base which identified needs and priorities. The intention would be to use the Inddor Built Facilities Strategy and Action Plan (2018) to help inform plans for provision in a local area. This can inform negotiations with developers so that when a generalised need is identified through the Sports Facilities Calculator then the evidence can provide finer grained detail. Draft Polcy LP26 refers to viability and this would also be part of policy implementation.
	Clearly, the requirements of Policy LP 26 will be also key in ensuring that the viability and deliverability of sustainable development schemes and the CLP overall is not undermined by unduly onerous cumulative policy requirements (i.e. other infrastructure and specific housing requirements).	
EDCLP/226 Eleanor Hood	No Comment	Noted.
EDCLP/231	We welcome Draft Policies LP 19 – LP28 which support the aims	Support for the policy is welcomed.
CBC	and objectives of the Council's adopted Open Space, Playing Pitch	Further consideration will be given to management and mainter and
Neighbourhoods and Community	and Indoor Built Sports Facilities Strategies. The Chapter promotes the creation of a high quality and healthy local environment and the	Further consideration will be given to management and maintenance arrangements.

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Well Being	inclusion of specific Charnwood Forest/National Forest (LP 20), Biodiversity (LP 22) and Tree Planting (LP 23) Policies are welcomed and supported.	We will also examine the scope for section 106 contributions to fund sports provision.
	Para 7.65 - In relation to management companies further clarity is required and specific policy is desirable. To ensure that Open Space is provided to a high quality in perpetuity new developments opting to use a management company could be required to pay a Bond or other appropriate security/step in rights. The management company should be accountable to residents and adhere to the RICS Service Charge Residential Management Code.	
	Para 7.67 and Draft Policy LP 26 - Contributions under Draft Policy LP 26 should be secured for all new developments of 10 dwellings and above. These contributions would be collected within a Strategic Swim Fund based on the provision of new facilities or the upgrading and improvement of existing provision in accordance with the Council's adopted Indoor Sports Facility Strategy. This should be a specific Policy requirement	
EDCLP/190 Sport England	Questions whether the local priorities are those which are identified in the Indoor Built Sports Facilities Strategy and calls for greater cross referencing to this effect.	Wording will be reviewed to ensure that the plan's priorities are aligned with the Indoor Built Sports Facilities Strategy.
	In accordance with NPPF para 96 it is important to keep he evidence robust and up to date.	We recognise the importance of ensuring a robust and up to date evidence base. Our Indoor Built Facilities Strategy (2018) recommended a review within 5 years.
	The Sports Facilities Calculator cannot be used in isolation. It needs to be used in conjunction with the Council's Indoor Built Sports Facilities Strategy.	There should be on-going monitoring of this Strategy through its implementation, but as a minimum, progress should be reviewed and refreshed every five years. On-going monitoring should include partnership working with neighbouring local authorities to keep aware of facility changes and developments.
		References to the Sports Facilities Calculator will be reviewed.
EDCLP/ 245 Avison Young obo	The University has concerns about the reference in criterion 2 of the policy to new indoor sports facilities on education sites providing a balance of opportunities and enhanced access through	Comments are noted. The Borough Council is keen to encourage public participation in sports
Loughborough University	a community use agreement. As the Borough Council will be aware, the University has always brought forward and will continue to explore opportunities for bringing forward proposals for indoor sports facilities that will help it to meet and deliver the requirements	activities, and extend the use of facilities as widely as possible, but we appreciate that there is a distinction between community use of the University's facilities and that of facilities provided by schools and colleges.

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	for its elite athlete programme, increase participation in sport amongst the wider student population and to cater for the needs of its staff and tenants. As a consequence, public access has always been at the discretion of the University unless a funding agreement(s) (i.e. agreements with Sport England) for a facility specifically stipulate that the University must provide an element of community use.	
	In addition, the University has always understood that this policy criteria is intended to apply to new facilities at schools and colleges which are funded by the Local Education Authority, and which would generally be able to provide increased opportunities for community access.	
	The policy and / or its supporting text should be modified to make clear what the Borough Council means by 'education' and confirm that this criteria will not be applied to the assessment of any proposals for new indoor sports facilities on University land, unless that proposal specifically requires the University to offer up an element of use as part of the external funding agreement for the facility.	
EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	Comments of the County Council are welcomed.
DCLP 266 Leicester City Council	The City Council notes that Charnwood's (and other districts') plans provide for considerable housing growth at the boundaries of the City which would draw heavily on existing built leisure facilities within the City. The City Council would welcome recognition of the potential for cross-boundary solutions to indoor sport provision that avoid duplication and promote the sustainability of any provision. See also comment below as to the limitations of using the Sport England Facility Planning Calculator in isolation.	We recognise the importance of cross boundary working across administrative boundaries. Our evidence base comprised a playing pitch strategy and indoor built sports facilities strategy. Both studies had regard to provision in neighbouring authorities.
DCLP 266 Leicester City Council	The City Council considers that there is a significant reliance in the proposed policy on Sport England's Facility Planning Calculator, and that the calculator has significant limitations and needs to be considered alongside other evidence such as latent demand studies, usage and participation data.	We agree that the reference to the Sports facilities Calculator needs to be qualified and changes to the wording will be made to this effect. Our evidence base studies considered provision in neighbouring authorities.

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	The City Council considers that contributions may sometimes be required to offset the impact of development near to the City boundary upon indoor sports facilities within the City.	Section 106 contributions would need to be negotiated having regard to policy and the characteristics of each application.
	boundary upon indeer sports racinges within the only.	Any scope for using monies on a cross boundary basis would depend on the nature of the planning application and the assessment of its cross boundary impacts.
Do you have any o If you don't agree	ection of Community Facilities comments on this draft policy? with the proposed policy please set out why and what alternative nave missed something?	approach would you suggest?
DCLP/106 Mr Dennis Marchant	The policy is supported.	Comment is noted.
DCLP/167 County Councillor Max Hunt	Paragraph 7.68 attempts to say what is meant by a community facility as playing 'an important role in social interaction' but the National Planning Policy Framework (2019) describes community facilities as "such as health, education and cultural infrastructure". To avoid unhelpful disputes (eg to differentiate between public houses and public conveniences), should this be clarified?	Further consideration will be given to wording of this paragraph to improve clarity.
DCLP/233 Mr Gideon Cumming	I suggest that proposed 800m walking distance is reduced to 400m.	800m is a 10 minute walk in the Fields in Trust walking time catchments.
DCLP/262 Theatres Trust	We welcome the premise of this policy but would recommend amendment in order to ensure robust protection of Charnwood's valued community facilities and to prevent them becoming unintentionally undermined. The first bullet discusses "adequate alternative provision"; it might be the case that an alternative facility is available but it may not meet the same need. For example an alternative pub might exist, but if the pub at risk of loss is known for live music that is a function which cannot necessarily be absorbed elsewhere. The two may also serve very different groups. We would recommend revision as follows:	We appreciate these helpful comments and will take them into account in redrafting the plan.
	 the facility will be re-provided to at least the same standard as part of new development The second bullet point discusses viability, but only in the economic sense. It can often be the case that these facilities are unable to operate profitably on a full market 	

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	 basis, or may thrive under alternative ownership. Nonetheless they often meet a need within the community. A more appropriate measure would be to consider whether the facility is required by the community. We would suggest the following revision: all reasonable efforts have been made to preserve the facility but it has been demonstrated that a need no longer exists within the local community and the site cannot be used for alternative community use. 	
	The third bullet point sets out evidence requirements to justify loss. We are more broadly in agreement with this wording, however we would urge further refinement to set out the 'meaningful period' (we would urge at least 12 months) and add 'at a reasonable value according to size, condition and existing use without development potential'. We support the involvement of the community in identifying assets.	
	If you don't agree with the proposed policy please set out why and what alternative approach you would suggest.	
	We consider the policy could be strengthened, with proposed wording set out in question 32a.	
	We would suggest further guidance is provided as to what types of facilities are covered by this policy, which to accord with paragraph 92 of the NPPF should include cultural facilities such as theatres along with pubs.	
LDCLP/02 Anonymous	Shepshed needs more development and there should be more of a focus on Shepshed. An indoor area should be developed for Shepshed	We welcome your comments. The provision of a new facility would depend on needs, priorities, resources and opportunities. Considerations of scheme viability would also need to be taken into account as part of the planning process.
LDCLP/51 Anonymous	They need encouraging for localism which will come on the back of less car use.	Comments are noted.
EDCLP/74 Mr Hussain	I agree with protecting what we have but disagree with expanding on any of it for the time being, even if, any such building fails to meet a viable, feasible or practicable existing use.	Comments are noted.

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EDCLP/86 Rothley Parish Council	Rothley Parish Council would like to see the present community facility known as the Rothley Centre and its car park added and included in the statutory list of assets of community value and would encourage developing a solution for its retention and enhancement.	
EDCLP/108 Sue Barry	Community Centres, Youth Centres, Sure Start Centres etc are important places to help people develop and grow to be healthy responsible people. It's very sad that these were cut by Government as they filled a huge gap in Society. This has been counterproductive as it has created more problems. I hope that these will be funded for future generations.	Comment is noted.
EDCLP/121 Marie Birkinshaw	Very important to get developers to support this in advance of new build and to create communities from the very beginning.	Comment is noted
EDCLP/125 Tim Birkinshaw	Community facilities should include footpaths, cycle ways and access to countryside and recreational facilities. All too often footpaths are lost in the mazes of housing developments and those links are lost. Footpaths, bridleways and shared open spaces should be explicitly included in this policy.	Reference should be made to the policy on Sustainable Transport where these issues are referenced.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We broadly agree but there should be evidence that it had been marketed for a two year period and that there is then no realistic interest in its retention. Two years represents a good time period in which local interest in retaining a facility could organise to develop an alternative community use.	The policy also refers to the community right to bid whereby communities can ask us to list certain assets as being of value and then if a listed asset comes up for sale, the right will give the community six months to put together a bid to buy it.
EDCLP/147 Hoton Parish	Is 800m practical? 800m of where?	The walking distance of 800m signifies the distance between a residential property and a community building.
Council	Has true consideration been given to community facilities within the rural settlements? Consideration needs to be given to the detrimental impact on	The distance is 800m is a 10 minute walk in the Fields in Trust walking time catchments.
	community facilities as a result of housing development. Some may not be able to cope with an increase in residents and thus may need to be replaced or be given a contribution to enable expansion.	The consultants preparing the Open Space Assessment surveyed all parish councils to ascertain levels of provision in rural settlements. The residents of new housing development are likely to make use of existing community facilities. The higher level of demand may be beneficial in some respects as a greater range of activities may be supported. On the other hand additional demand can place pressure on existing facilities and in such cases developer contributions could be negotiated to secure improvements.

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EDCLP/157 Lorraine Davies Mountsorrel Parish Council	The Parish Council very strongly supports the Local Plan policies as drafted in connection with Healthy Communities, Open Space, Sport and Recreation, Indoor Sports Facilities and Protection of Community Facilities and the very important provisions and priorities identified which must be strictly applied in order to protect the Borough's environmental assets and the health and well-being of Charnwood's communities.	Support for the policy is welcomed.
EDCLP/231 CBC Neighbourhoods and Community Well Being	 We welcome Draft Policies LP 19 – LP28 which support the aims and objectives of the Council's adopted Open Space, Playing Pitch and Indoor Built Sports Facilities Strategies. The section on the protection of community facilities should reflect both protection and provision of new or enhanced Community Facilities. It should give weight to provision for facility requirements identified through Neighbourhood Plans and should promote strategic Community Infrastructure provision in response to population growth and changing local needs. Large developments should plan and provide facilities for community use on site i.e. community hall provision. Smaller developments may be required to contribute to off-site provision 	Support for these policies is welcomed. Consideration will be the scope of the policy, namely the balance between protecting existing facilities and the provision of new and enhanced facilities. Developer contributions can be negotiated as part of planning applications for new or enhanced provision.
EDCLP/190 Sport England	 where need has been identified i.e. through Neighbourhood Plans Policy 26 is a new facilities while Policy 27 is a protective policy. Questions whether sports facilities (including privately owned but accessible to members of the public) fall within this policy. Need for a definition of community facilities. 	 Further consideration will be given to the policy wording to clarify issues relating to ownership. The Indoor Built Sports facilities distinguished between facilities which have community use if they are open for use by sports clubs / community groups and facilities which offer community accessible pay and play use if they are open for use by individuals in the community. Consideration will be given to defining community facilities within the plan.
EDCLP/158 Mrs J Brettle- West	Would like to see the present community facility known as the Rothley Centre added and included on the statutory list of assets of community value and would encourage developing a solution for retention and enhancement.	We welcome your interest but there is a separate process to go through for listing assets of community value which is set out on th Borough Council's website.
EDCLP/256 John Weston	The infrastructure within our area cannot cope with further development; there is no doctors at East Goscote, Syston doctors is full to overflowing and the local schools are full	Your comments are noted.
EDCLP/239	Rothley Centre should be added as an asset of community value	We welcome your interest but there is a separate process to go through

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Vivienne Barratt- Peacock	on the statutory list.	for listing assets of community value which is set out on th Borough Council's website.
EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	Support for the policies is welcomed.
Q33 - LP28 - Buria		
	comments on this draft policy?	
	with the proposed policy please set out why and what alternative	e approach would you suggest?
	ave missed something?	
DCLP/104 Mr Dennis	The policy is supported but the statement that 'elsewhere in the	We welcome your comments on burial provision in Quorn.
Marchant	Borough our evidence shows that burial provision is likely to be sufficient is questioned as Quorn has only a 6 years supply of	
Marchant	Coffin Burial Spaces and a 2 year supply of Ashes Burial Spaces.	
DCLP/188	Quorndon Parish Council has evidence gathered as part of the	We welcome your comments on burial provision in Quorn.
Quorndon Parish	Neighbourhood Plan process that the statement that 'elsewhere in	
Council	the Borough our evidence shows that burial provision is likely to be	
	sufficient' is not correct as in Quorn there is less than a 6 years	
	supply of Coffin Burial Spaces and less than a 2 year supply of	
	Ashes Burial Spaces.	
	Chanabad's buriel ground is possible full and Chanabad will pood a	We welcome your commente en huriel provision in Chenched
LDCLP/02 Anonymous	Shepshed's burial ground is nearly full and Shepshed will need a new burial areas soon so the town needs a new burial ground.	We welcome your comments on burial provision in Shepshed.
LDCLP/15	Will building houses right next to this prevent future expansion?	Your comment is noted.
Anonymous	There is no consideration given in the policy relating to this matter.	
LDCLP/22	Other than natural burials this is not a good use of land.	Provision needs to be made for a range of types of burials.
Anonymous		
EDCLP/34	More burial space is needed	Comment is noted. We undertook an Audit of Burial Space in 2019, but
Cllr Mary Draycott	•	local knowledge is always beneficial.
EDCLP/74	There is an urgency to save human lives so they live longer. Better	Comment is noted. The need for burial space will still be required even if
Mr Hussain	housing will encourage everything required to lead a healthier way	projects to increase health and wellbeing are successful.
	of life from all perceptible viewpoints, thus; the higher potential of	
	extending life expectancy.	
EDCLP/108	Need to be retained	Noted
Sue Barry		
EDCLP/121	Agree this is a useful site. Burial grounds have a particular	Our Open Spaces Assessment (2017) assessed churchyards in terms of
Marie Birkinshaw	importance as wildlife refuges and as quiet reflective spaces that	their value for wildlife amongst other factors.
	could usefully be planned in in advance. Reference is made to Great Crested Newts being protected in the Leicester Road	
	Great Greated Newls being protected in the Leicester Road	

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	Remembrance Garden.	
EDCLP/125 Tim Birkinshaw	Not an ideal site but, given the constraints, not too bad a site.	Access to the site would be considered as part of the site's development.
	Access to the site has been overlooked by foot as well as car	
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	Policy agreed.	Support is welcomed.
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	We recognise the need for new burial space within Loughborough. The proposed location of such a facility should ensure that all technical considerations, including access, have been fully considered. However, given the extent of constraints elsewhere around the town, additional burial space would be best located on land which is less suited for residential development. Instead it could be situated on land which forms part of wider GI networks and accessible countryside.	The Council undertook a rigorous selection process for this site. A number of other sites were considered but this site was preferred.
EDCLP/226 Eleanor Hood	No Comment	Noted.
EDCLP/231 CBC Neighbourhoods and Community Well Being	We welcome Draft Policies LP 19 – LP28 which support the aims and objectives of the Council's adopted Open Space, Playing Pitch and Indoor Built Sports Facilities Strategies. The Chapter promotes the creation of a high quality and healthy local environment and the inclusion of specific Charnwood Forest/National Forest (LP 20), Biodiversity (LP 22) and Tree Planting (LP 23) Policies are welcomed and supported.	Support for the policy is welcome.
EDCLP'203 Leicestershire and Rutland Bridleways Association	Burial spaces provision should be required for the increasingly popular horse-drawn funerals on the approaches to and at the sites.	The site would need to make provision for a range of types of funeral practices.
EDCLP/192 Severn Trent Water	Based on the location identified within the Policy Map for the new Burial Space, the proposed site does not appear to be located within a Source Protection Zone and is downstream of Nanpantan Reservoir, so we would therefore have no objections to the proposed location.	Comments are noted.
DCLP-425-470 Environment Agency	Desk-top and site investigation works may be a requirement of any planning permission granted to ensure that the use of the land as a burial site does not pose a risk to the water environment.	Detailed site investigations would be considered as part of the site's development.

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EDCLP/252 Leicestershire County Council Strategic Land	Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.	Support for the policy is welcomed.
DCLP 266 Leicester City Council	In preparing its own draft Local Plan for consultation the City Council has sought to optimise opportunities to sustainably accommodate as much of the City's development needs as possible within the City boundary. As a consequence of this and diminishing capacity within the City's existing active cemeteries, the City Council needs to find an out-of-City solution to future demand for burial space. The City Council, in its capacity as owner of land between Thurcaston and Cropston, has responded to your consultation by promoting this land as a suitable location for a new cemetery together with associated green infrastructure. As the neighbouring local planning authority, the City Council wishes to commend the planning advantages of that land promotion. Not least, that it helps to safeguard land within the City boundary to help meet housing and employment development (thus limiting the scale of unmet need), that it would provide additional burial capacity in a location that could be made sustainably accessible to residents of the City and the wider principal urban area, and that it would not conflict with Green Wedge objectives	Discussions with the City Council have taken place and the suitability of the site for allocation as a burial site in the Local Plan will be considered.
	and your countryside protection policies.	Discussions with the Oity Osympil hours taken place and the switch lity of
DCLP 266 Leicester City Council	The City Council is planning for a new cemetery to provide sustainable burial space to meet the needs of the City. This includes former residents that may move into the County for housing and/or employment, but wish to be buried back in Leicester.	Discussions with the City Council have taken place and the suitability of the site for allocation as a burial site in the Local Plan will be considered.
	Desktop assessments of potential land within the City has highlighted a lack of suitable land within the City (without diminishing the City's capacity to accommodate further housing and employment development). Therefore it is likely that the City Council will be seeking to find a site on the edge of Leicester to develop a new cemetery within the lifespan of the Charnwood Local Plan.	

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DCLP 266 Leicester City Council	The City Council considers that draft Policy LP28 should be extended so that, in addition to allocating 9.1ha additional burial land at Nanpantan, there are planning criteria for the development of other new burial sites whether these be brought forward by burial authorities such as the City Council or private sector providers. The draft Policy should be more flexible and provide criteria on the development of other burial space whether that be cemeteries or natural burial grounds often provided by private sector enterprises and growing in popularity. The City Council notes that the Charnwood Borough Council audit of burial space does not record the presence of at least two private burial sites (Prestwold & South Croxton) within the Borough.	Further consideration will be given to the wording of the policy. The reference to the private natural burial sites at Prestwold and South Croxton is noted.
EDCLP/198 Alan Brown Leicester City Council	 Please find enclosed a completed Strategic Housing and Employment Land Availability Assessment form with supporting plans for consideration as part of the Charnwood Borough Council Local Plan consultation. As the landowner, Leicester City Council request that consideration be given to allocating burial space provision/policy within the Charnwood Borough Council Local Plan in order to meet a need for burial space for bereaved families in Leicester. The City Council operates four cemeteries, with new grave provision only available at two sites, and has calculated that existing capacity to provide new graves will be exhausted by 2030. The City Council's Burial Space Strategy 2014 identified that a new burial site would be required by 2030 as a long term solution to the decreasing availability of burial space in the city. The City Council conducts an average of 900 interments each year, including non-city residents, and with a growing population predicted to reach 404,500 by 2041 will be faced with a growing demand for burial facilities. To provide new burial space to meet a minimum of 50 years use will require a site of at least 16.5 hectares in order to provide enough space for graves and supporting infrastructure such as pathways and landscaping. An assessment of potential land within the city has been completed 	Discussions with the City Council have taken place and the suitability of the site for allocation as a burial site in the Local Plan will be considered.

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Chapter 8 - C	as part of Leicester City Council's own Local Plan. Unfortunately, the assessment highlighted that due to the constraints of developing a new cemetery, and the council's need to allocate land for strategic housing and employment there is no suitable land available within the city for a new cemetery development to meet the required needs. The site we are putting forward extends to 72.2 hectares between Cropston and Thurcaston, however the development proposal to establish new burial space is on only 16.5 hectares of this site fronted by Anstey Lane, keeping the majority of the site as open green space. Cemetery provision is considered to be compatible within open space provision. It is envisaged that the council will utilise the remaining land for greenspace infrastructure improvements.	
	wable and Low Carbon Energy	
	comments on this draft policy?	
	with the proposed policy please set out why and what alternative	e approach would you suggest?
	ave missed something?	Noted the level plan has recent to (mode) as in the order plane.
DCLP/103 Mr Dennis Marchant	The policy is supported provided that the policies contained in the Neighbourhood Plan are considered.	Noted – the local plan has regard to 'made' neighbourhood plans. Likewise, once the local plan is adopted, neighbourhood plans will need to be in conformity with the policy framework.
DCLP/158 Mr David Campbell-Kelly	Wind Farms MUST avoid highly sensitive landscape areas. High Leicestershire is a HIGH risk area not moderate!	Noted – landscape sensitivity and landscape impacts would be taken into consideration when determining any future applications for wind turbines.
DCLP/168 County Councillor Max Hunt	The conditions for wind turbines, including any adverse impacts on the environment including local amenity, the historic environment and the setting of heritage assets, noise and odour, the wider landscape, biodiversity and public safety, coupled with the geographical constraints in map 2 are so broad that they may render any application open to significant risk and costs associated. This is may not deter large organisations but it may restrict the ability of small organisations and communities from installing turbines. Exceptions should be considered for single installations for community micro generation.	Noted – the policy framework set out in the draft local plan facilitates this possibility.
Quorn Parish Council	Agree – the policy is supported provided that the applicable QNP policies are considered.	Noted – the local plan has regard to 'made' neighbourhood plans. Likewise, once the local plan is adopted, neighbourhood plans will need to be in conformity with the policy framework.
DCLP/373 Mr John Barton	As I said, stop worrying about what buildings look like and start prioritising energy efficiency and insulation. We have a climate	Noted. The policy promotes the delivery of renewable and low carbon energy generation.

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	emergency. Yes, build more solar farms and roof-top solar everywhere. Build more wind turbines everywhere that's more than about a mile from housing.	
DCLP/423 Mr Martin Smith	Do you have any comments on this draft policy? Yes, policy should focus on energy use not generation. - Reduce journey need - not increase it	Noted – Draft Policy LP30 and Draft Policy LP33 include measures to reduce energy use.
	 New homes to carbon zero If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? High focus on energy use Do you think we have missed something? Passive haus standards or equivalent 	Where possible, the policy wording will be strengthened to allow the Council to meet its priority objectives of tackling climate change and delivering sustainable development.
LDCLP/02 Anonymous	More solar power Electric cars use fossil fuels!! More recycling areas and bins Water bottle refills in the area	Noted – the policy framework set out in the draft local plan facilitates this possibility.
LDCLP/22 Anonymous	Each property should be regulated to have its own energy source for example its own wind turbine/solar panels so that it is more say sufficient and not therefore reliant on fossil fuel and large multi national power companies. Do you think we have missed something? See previous comments – The new houses to have air heat pumps or ground heat source heating systems again to reduce reliance on fossil fuels.	Noted – the policy framework set out in Draft Policy LP29 and Draft Policy LP30 facilitates this possibility.
LDCLP/34 Anonymous	Yes, we need more!	Noted.
LDCLP/51 Anonymous	Need encouraging more but on already built facilities not pushing into countryside.	Noted.
EDCLP/39 Lynda Needham	Climate change is a global issue which we are all responsible for and therefore the importance of green energy efficient development i.e. solar on roofs or ground source heat pumps etc. for new buildings is necessary now in the future.	Noted – the policy framework set out in the draft local plan facilitates this possibility.
EDCLP/74 Mr Hussain	 8.1 no comment 8.2 no comment 8.3 no comment 8.4 no comment 8.5 Plant more trees. 8.6 no comment 8.7 no comment 8.7 no comment 8.8 Why are we buying this commodity from overseas, i.e. is price 	Noted – the policy framework set out in the draft local plan facilitates this possibility.

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	dictating the cost to the environment in terms of freight emissions that could not otherwise have been prevented by sourcing more locally to reduce those emissions? Where are the priorities here and would it be more cost efficient for the country to deal more locally, hence; less impact on the environment? 8.9 Upgrading all older housing will play a significant role in reducing emissions. It should be acted on with immediate effect by stimulating the housing market and buying all types of properties for social housing purposes. 8.10 Installation of solar panels in every home surely should be seen as one of govt's highest priorities for all of the obvious reasons? Table 7 noted 8.11 People need a decent home before they can actually go out to work with a healthy mindset to play active and important roles in society having full concentration on the job they're doing. Emphasis is on a decent, high quality fully functioning home with all time- binding efficiencies to run a family home smoothly so that work life actually complements the adequate fulfilment of an individual's homely life. What is the point of creating the infrastructure for more jobs without proper homes for the people that could potentially apply for them? 8.12 no comment 8.13 no comment 8.14 no comment 8.15 no comment 8.16 no comment 8.17 no comment	
EDCLP/80 Historic England	Although the reference to heritage assets within policy LP29 is welcomed, there are strong concerns / potential objection to the approach taken to renewable and low carbon energy installations, with particular reference to the inclusion of Policies Map 2. The approach taken towards identifying potential areas for wind energy and solar energy developments is not based upon sufficiently robust evidence; the Renewable and Low Carbon Study November 2018 does not reference heritage at all. There is insufficient focus on heritage within the accompanying landscape sensitivity assessment. Heritage should be explicit within the title, given the detail required a separate document may be required. Have assessments been carried out to assess potential heritage impacts? The statement within paragraph 5.43 is welcomed but there is strong concern regarding the approach taken. Indeed the	Any proposals for renewable energy installations will be required to provide robust technical evidence – both to justify the need, and to demonstrate that impacts are mitigated. The feedback on the lack of clarity surrounding the assessment of impacts on heritage assets is noted. Where possible, the policy wording will be strengthened to allow the Council to meet its objectives of maintaining and enhancing the historic environment.

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	areas which have been identified as being suitable for such developments may result in harm to a number of Charnwood's most important designated heritage assets and hence render the policy incompatible with achieving sustainable development in accordance with NPPF, and specifically paragraph 185.	
	If Policies Map 2 was to be retained, a box should be added to the map to state that heritage assets have not been taken into account in the drawing of this map. However, at this stage, Historic England have strong concerns regarding the inclusion of the map and the strength of the evidence used in its preparation. When further research is carried out, this may indicate that the areas shown are not suitable in part / entirety. For example, when further studies were carried out for the South East Lincolnshire Local Plan, March 2019, it was determined that there were no further suitable sites for wind turbines.	
	Paragraph 007 of the Planning Practice Guidance for Renewable and low carbon energy, states that "great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;" The approach proposed does not reflect this.	
	Consequently, it is considered that the approach of Policy LP29 and Policies Map 2 is unsound for the following reasons:-	
	(1) The identification of specific areas as being suitable for wind energy development is not based upon a sufficiently robust evidence base.	
	(2) The areas which have been identified for wind energy development could lead to pressure for such developments in locations which would be likely to result in harm to a number of Charnwood's most important designated heritage assets. Consequently, the approach to the identification of specific areas as being suitable for wind turbine developments does not demonstrate that the plan is setting out a "positive strategy for the conservation of the historic environment" as is required in the NPPF.	
EDCLP/26 East Midlands	We support the overall objectives and the approach to renewable and low carbon energy, however in considering and identifying	Any proposals for renewable energy installations will be required to provide robust technical evidence – both to justify the need, and to

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	REPRESENTATION SUMMARY potential sites for wind turbine and solar PV installations it will be important to recognise the need to ensure that aviation safety is not compromised. East Midlands Airport is an officially safeguarded under the requirements of ODPM Circular 1/2003. The objective of this Circular is to protect the safe operation of the airport and its surrounding airspace from developments that may compromise aircraft and passenger safety. The safeguarded area is shown on the safeguarding map that is issued to local authorities and this defines the areas and the types of development for which the Airport is a statutory consultee. Consultation with the Airport is required for development proposals that are; a) buildings, structures, erections and works that exceed the heights specified on the safeguarding map; b) any proposed development that may have the potential to interfere with the operation of navigational aids, radio aids and telecommunication systems; c) lighting or large-scale solar arrays that may have the potential to distract pilots particularly in the immediate vicinity and beneath aircraft departure and arrival routes; d) proposals for any aviation use within 13km of the Airport; e) any proposal within a 13km circle centred on East Midlands Airport that has the potential to attract large numbers of birds – such proposals include significant areas of landscaping or tree planting, minerals extraction or quarying, waste disposal or management, reservoirs or significant waterbodies, land restoration schemes, sewage works, nature reserves or bird sanctuaries; f) any proposals for any wind turbines within a 30km circle that is centred on East Midlands Airport. Much of Charnwood is within the Airport safeguarded area, and some of the particularly sensitive areas include parts of Charnwood Forest. It is therefore important that the aerodrome safeguarding requirements for East Midlands Airport are included as a Local Plan policy. The wording of this policy could be along the lines of; 'within the	OFFICER RESPONSE demonstrate that impacts are mitigated. The feedback on the lack of clarity surrounding the assessment of impacts is noted. Where possible, the policy wording will be strengthened to allow the Council to meet its objectives.
EDCLP/86	RPC does not agree with the comment in the sustainability report	The opportunity areas have been defined based upon the evidence in the

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Rothley Parish Council	suggesting that the land off Westfield Lane might be suitable for "wind energy opportunities". This would detract from the existing character of the area and damage views and vista in the area of proposed local separation and conservation areas.	Renewable and Low Carbon Study. Any proposals for renewable energy installations will be required to provide robust technical evidence – both to justify the need, and to demonstrate that impacts are mitigated.
EDCLP/108 Sue Barry	Yes to all renewable/ low carbon	Noted – support is welcomed.
EDCLP/115 Charnwood Constituency Labour Party	Plans must demonstrate sustainability in respect of power use with solar and wind generation being integral to the agreed development.	Noted – the policy framework set out in the draft local plan facilitates this possibility.
EDCLP/121 Marie Birkinshaw	Related jobs and skills need to be built in over the required timescale for net zero.	Noted – the policy framework set out in the draft local plan facilitates this possibility.
EDCLP/125 Tim Birkinshaw	Probably OK; may not be ambitious enough Do you think we have missed something? Solar (PV) and solar-thermal installations on housing, especially new build. Although small the sum will be significant. Future energy storage (e.g. from daytime PV for night-time use).	Noted – the policy framework, especially Draft Policy LP30 facilitates this possibility.
EDCLP/130 Lee Perkins	Plans must demonstrate sustainability in respect of power use with solar and wind generation being integral to the agreed development.	Noted – the policy framework set out in the draft local plan facilitates this possibility.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We agree broadly with the approach set out in LP29. In the light of the climate emergency, we agree with the need to encourage further renewable sources of energy supply in the Borough (para. 8.10). We agree with the attempt to set out a balanced approach to the provision of new sources and the protection of the countryside and landscape (para. 8.12) together with the accompanying tables 7, 8 and 9. While not necessarily agreeing fully with every individual site assessment, we are pleased to see this attempt to set out criteria and a hierarchy of where such developments could be acceptable. This could be enhanced further with the production of a Supplementary Planning Document (SPD) on Renewable Energy.	Noted – support is welcomed.
EDCLP/147 Hoton Parish Council	The policy should be more aspirational and aim for a carbon neutral Charnwood by 2036.	Noted.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	Similarly there is support for the policies in this section. Two strong priorities for Mountsorrel - managing flood risk and sustainable travel. An Action Plan in these areas should be brought forward.	Noted – the policy framework set out in the draft local plan facilitates this possibility.

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EDCLP/163 Liz Hawkes Anstey Parish Council	The importance of the environmental needs mentioned above (Areas of Separation, Green Wedges and Tree Planting) are significant in adding to the work of combating climate change. Sites for renewable energy should be identified locally by the developing Neighbourhood Plan and the Anstey Landscape Character Assessment.	Noted – the policy framework set out in the draft local plan facilitates this possibility.
EDCLP/165 Dr S.J.Bullman	I support wind and solar projects in the region. Point 8.4 says: "we can all make changes to our lifestyles" & "We will help make these changes" And Point 8.9 says: "Whilst we have seen a reduction in energy consumption and emissions patterns in our Borough, we still need to do more to reinforce our efforts in reducing carbon emissions." The biggest, long term effect you can immediately have is by demanding more of development design specification at the planning application stage, as per my answer to Q7c. That has an immediate and very long term effect, and prevents poor energy consumption patterns being introduced which will need retrospective mitigation in future years. Acting now can future-proof Charnwood and start reducing unnecessary carbon emissions from the day permitted development work begins. Such improvements would start to contribute to the Climate Change Strategy immediately on implementation. See Q35b for much more extensive comment of what measures could help this.	Noted – the policy framework aims to raise the quality and standard of new development to ensure that we mitigate and adapt to climate change, whilst also facilitating sustainable development.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	 8.2 – good but it should not just be CBC committed to making operations carbon neutral, local businesses and people should be encouraged to do the same. 8.6 - natural flood management schemes should be listed. 8.7 – other habitats can be equally or even more effective at sequestering carbon than trees. These should be encouraged too. (Carbon storage by habitat - Natural England; ponds can absorb more carbon than woodlands) 	Noted – the reasoned justification for Draft Policy LP29 will be updated (where necessary) taking account of this representation.
EDCLP/226 Eleanor Hood	From the information provided it would be appear the incinerator plant has been given planning permission. It must be insisted that the particulate matter from the flue must not reduce the quality of the air in the town. This must be monitored frequently and you gain authority to close the plant down should it do so. The prowess of the university as a training site for elite athletes must be maintained - it is too important to be ignored.	Any controls over particulates associated with a development proposal will be addressed through conditions attached to any permission.
EDCLP/237	There should be a target for CO2 in 2035 as a result of the Local 1016	Noted – the Council welcomes the feedback on the policy and recognises

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P.Williams	Plan policies The chapter and policy says nothing about the provision of power through domestic scale solar facilities - given the potential for such decentralised provision this should be covered in terms of current supply and future policy. Nothing also seems to be said about any planning issues relating to measures that will improve energy efficiency e.g. external cladding, ground, air and water heat exchangers etc Is there an opportunity to support specific communities to become zero carbon?	that there may be opportunities to strengthen or alter policy wording to improve clarity, and to add emphasis on different topics. This response will be used to shape the next version of the policy and the next draft of the local plan.
EDCLP/192 Severn Trent Water	 Severn Trent are generally supportive of the principles outlined within Policy LP 29 renewable and Low Carbon Energy Installations. Severn Trent recognises the importance of reducing carbon emissions and recognises that as a utility provider there are a number of areas where we produce carbon emissions. We have therefore signed up to a Triple Pledge for Carbon of: Net Zero Carbon emissions by 2030 100% renewable energy use by 2030 100% electric vehicles by 2030 (where suitable models are available) To enable us to deliver this pledge there may be a need to build or support the construction of renewable sources of energy. 	Noted – support is welcomed.
EDCLP/159	I welcome the Council's plans for renewable and low carbon energy installations.	Noted – support is welcomed.
C.Mulvaney EDCLP/158 Mrs J Brettle- West	I do not agree with the comment in the substainability report saying that the land off Westfield Lane would be good for "wind energy opportunities". This would detract from the existing character of the area, damage views and vista of the area of proposed local separation and conservation areas.	The opportunity areas have been defined based upon the evidence in the Renewable and Low Carbon Study.Any proposals for renewable energy installations will be required to provide robust technical evidence – both to justify the need, and to demonstrate that impacts are mitigated.
DCLP-425-470 Environment Agency	The Environment Agency welcomes the Local Planning Authority's support of renewable and low carbon energy installations and technologies.	Noted – support is welcomed.
EDCLP/253 Ann Irving	Has the policy team considered the redundant windmill in Woodhouse Eaves as a site for wind power? The restored windmill base is already there – could this be amplified, restored or re- imagined to provide power to the village? There is some local interest in a project of this kind.	Subject to viability, the Council is willing to discuss and consider all opportunities.
EDCLP/ 245	The University intends to meet the Government's net-zero carbon	Noted – support is welcomed.

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Avison Young obo Loughborough University	target by 2050 and is exploring how it can meet more of its energy needs through renewable and low carbon sources. For this reason, it welcomes the inclusion in the Plan of a policy which supports proposals for wind and solar energy installations, provided that they would not give rise to any adverse impacts on their surroundings, technical or environmental effects.	
EDCLP/239 Jonathon Barratt- Peacock	I do not consider that the 2 areas of land off West Cross Lane are suitable locations for Solar power as they would be widely visible across the Rothley Ridgeway conservation area. I understand that sites become classed as brownfield after they have been used for such purposes, meaning that permission for housing is more likely to be given in later years. I do not agree with the comment in the Sustainability report saying that the land off Westfield Lane would be good for "wind energy opportunities". This would detract from the existing character of the area, damage views and vista of the area of proposed local separation and conservation areas.	The opportunity areas have been defined based upon the evidence in the Renewable and Low Carbon Study. Any proposals for renewable energy installations will be required to provide robust technical evidence – both to justify the need, and to demonstrate that impacts are mitigated.
EDCLP/239 Vivienne Barratt- Peacock	The large metal roof of the new Rothley school would be a great location for solar panels as it faces the sun and has a very large surface area. I do not consider that the 2 areas of land off West Cross Lane are suitable locations for Solar power as they would be widely visible across the Rothley Ridgeway conservation area. I understand that sites become classed as brownfield after they have been used for such purposes, meaning that permission for housing is more likely to be given in later years. I do not agree with the comment in the Sustainability report saying that the land off Westfield Lane would be good for "wind energy opportunities". This would detract from the existing character of the area, damage views and vista of the area of proposed local separation and conservation areas.	The opportunity areas have been defined based upon the evidence in the Renewable and Low Carbon Study. Any proposals for renewable energy installations will be required to provide robust technical evidence – both to justify the need, and to demonstrate that impacts are mitigated.
EDCLP/193 Richard Webb	I don't think that this policy is ambitious enough. A requirement for new buildings to have solar panels on all roofs or a large percentage of roof space. Mandating, at point of build the generation of power to offset or negate the consumption that will be needed.	Noted – the policy framework set out in the draft local plan facilitates this possibility.
DCLP 266	The City Council notes that some of the proposed opportunity 1018	The opportunity areas have been defined based upon the evidence in the

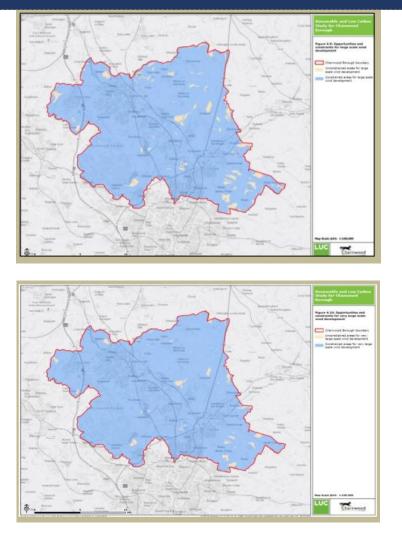
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Leicester City Council	areas are adjacent to Leicester. The City Council would expect the impact upon the City of applications for development pursuant to	Renewable and Low Carbon Study.
	these opportunity areas to be considered, in consultation with the City Council, against the criteria set out in draft Policy LP29.	Any proposals for renewable energy installations will be required to provide robust technical evidence – both to justify the need, and to demonstrate that impacts are mitigated.
EDCLP/272 Centre for Sustainable	Whilst we support the renewable energy policy in principle, we would encourage wording which included specific reference to the contribution of renewable energy to meeting our carbon reduction	The Council welcomes the advice provided and is grateful for the examples and constructive feedback on how to amend the policy.
Energy via Cllr Needham	commitments. The Climate Change Act means that we must entirely phase out fossil fuel energy entirely within the next 30 years if not sooner. As a result of this and the need to also decarbonise (and therefore electrify) heat and transport, renewable electricity generation must quadruple from current levels to meet these demands.	The Council will be reviewing the draft policy in light of these comments. The Council will alter the policy (where necessary) in an attempt to clarify and strengthen the policy wording.
	Please see the proposed draft policy below from Stroud Local Plan, which takes such an approach. We would also encourage the inclusion of text or a policy giving specific encouragement to community energy projects. It would also be beneficial to include specific mention of cumulative impacts.	

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	 Policy ES2 - Renewable or low carbon energy generation - Stroud District Local Plan Review - Draft Plan for Consultation - www.stroud.gov.uk/info/Draft_Plan_2019.pdf Decentralised renewable and low carbon energy schemes will be supported and encouraged, and will be approved where their impact is, or can be made, acceptable. In determining applications for renewable and low carbon energy, and associated infrastructure, the following issues will be considered: a. the contribution of the proposals, in the light of the Council's pledge to be carbon neutral by 2030, to cutting greenhouse gas emissions and decarbonising our energy system. b. the impact of the scheme, together with any cumulative issues, on landscape character, visual amenity, water quality and flood risk, heritage significance, recreation, biodiversity and, where appropriate, agricultural land use, aviation and telecommunications. c. the impact on users and residents of the local area, including where relevant, shadow flicker, air quality, vibration and noise. d. the direct benefits to the area and local community. Ground-mounted solar energy developments are more likely to be supported in areas identified as suitable in principle as set out on the Policies Map. Outside these areas, applicants will need to provide a clear justification for the suitability of the chosen development site for solar development travelegin any harm to the designated area or its setting. Additionally, proposals for vinde energy proposals within the AONB will be encouraged, however, where development proposals will affect the AONB, the benefits of development must demonstraby outwelph any harm to the designated area or its setting. Additionally, proposals for wind energy development: should be located within a suitable area as indicated on the Policies Map; are more likely to be supported if they fall within Landscape Character Areas of lower sensitivity to the relevant development	
	Looking at the detail of the policy, we question why policy refers to onshore wind and solar. Whilst the inclusion of gu for the these technologies is welcome, the evidence base Charnwood Renewable and Low Carbon Study) seems to that there is also potential for Small Scale Hydro and signi potential for heat generation from biomass wood fuel. Also, whilst we applaud the proposed wind policy in princip the opportunity areas which define large portions of the dis being suitable for wind, in limiting turbine size to 40 and 80 the policy seems to depart from the evidence base, which suggested that there are suitable areas for large scale and large scale turbines, as shown in the map extracts below.	uidelines (the suggest ficant ble and strict as 0 metres

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We note that whilst there are ecological and historic designations, there are no landscape designations, and therefore this limitation seems arbitrary and would greatly limit the deployment of onshore wind in the district.

Additionally the feedback received from a wind consultant / specialist is that the options for sourcing turbines of this size are more limited, and the units are likely to be fairly dated technology or even second-hand units (including without latest safety features like ice detection and shutdown, shadow flicker curtailment etc.) In his words, such restrictions to tip height often leads to short

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	stubby towers with blades very close to the ground (in extreme cases with the arc of the blades extend below the height of nearby trees). This is bad news for both production yield and for longevity of the turbines as they are subject to a lot more turbulence. Overall, given the evidence base, the policy does not appear to maximise the potential for renewable energy development as encouraged by the NPPF. Turbine size makes a huge difference to annual energy output with a doubling in height increasing energy output ten-fold, so where there are developable sites, turbine size and height should be maximised, within landscape constraints. Therefore we would suggest reviewing the policy to see whether suitable areas can also be identified for large and very large scale turbines. We would also suggest the addition of a policy like the following, to help safeguard existing and potential renewable energy resources and allow their exploitation.	
Do you have any If you don't agree	ainable Construction comments on this draft policy? with the proposed policy please set out why and what alternative nave missed something?	e approach would you suggest?
DCLP/101 Mr Dennis Marchant	The policy is supported.	Noted – support is welcomed.
DCLP/169 and DCLP/171 County Councillor Max Hunt	There is a lot of 'expecting' and 'encouraging' and little 'ensuring' in policy LP30. This suggests the LPA has little scope to implement these desires. Concrete has high embodied carbon but it is not clear what low embodied carbon construction materials the Plan should replace it.	Noted – where possible the policy wording will be strengthened to allow the Council to meet its priority objectives of tackling climate change and delivering sustainable development.
Mr Gideon Cumming	I suggest that the word 'encourage' is replaced with 'require'.	Noted – where possible the policy wording will be strengthened to allow the Council to meet its priority objectives of tackling climate change and delivering sustainable development.
DCLP/239 Mr John Catt	One aspect that appears to have been overlooked is how our buildings can affect our transport choices and hence our use of	The Council agrees that the issues associated with energy consumption and carbon emissions are complex and inter-related.

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	energy. Motorised transport accounts for a considerable proportion of carbon dioxide emissions. The layout of our buildings can affect the transport choices of inhabitants. Currently the requirements for parking tend to put a car immediately outside the front door so making it the obvious transport choice. No provision is made for cycle parking meaning that bicycles are often parked in garden sheds and not convenient to use. Hence they are only taken out when a deliberate decision is made to go for a cycle ride. I'd suggest that car parking and garaging should be in a separate area of new estates, so that reaching the car will involve a walk. However secure covered cycle parking built into the home should be a requirement for all new developments. The number of slots being linked to the number of bedrooms. Single bedroom 2 slots, 4 bedroom 6 slots. These slots would have electric points to facilitate charging electric bike and could also be used for mobility scooter (which will become a more common requirement as the population ages).	The draft local plan provides a policy framework to achieve both high quality design and sustainable transport solutions across the borough. Draft Policy LP2 seeks to ensure new development reduces the impact on climate change; whilst Draft Policy LP33 and Draft Policy LP35 will ensure that sustainable transport is prioritised and car parking is proportionate to the scale of development.
DCLP/375 Mr John Barton	Again, stop worrying what buildings looks like. There are newer, cheaper, more energy efficient ways to build now. We need to replace or retro-fit insulation on every building.	Noted – the policy supports the use of modern materials and construction methods. Whilst the policy framework primarily caters to proposals for new development; Draft Policy LP30 also applies to the refurbishment of buildings to adapt to climate change.
DCLP/423 Mr Martin Smith	Much more work to be done! Be more ambitious	Noted.
LDCLP/02 Anonymous	More the houses built to last and make sure drainage is OK Do you think we have missed something? Yes drainage/flooding	Noted – managing flood risk through effective drainage is a fundamental component of the draft local plan. Draft Policy LP31 and Draft Policy LP32 set out measures to ensure that drainage, and sustainable drainage, are primary considerations in delivering new development.
LDCLP/22 Anonymous	Not only sustainable construction but sustainable use of land – food productive to be local to reduce food miles. This will not be possible if all the land is built on.	The effective use of land, and the impact on agricultural land is considered through the site assessment work carried out by the Council. Understanding the impact on Best and Most Versatile Land is a requirement of the NPPF, and is a criterion for helping decide which sites should be put forward for development.
LDCLP/34 Anonymous	No more cutting corners.	Noted
EDCLP/34 Cllr Mary Draycott	Houses being built are not fit for the future. They need to be better insulated, zero carbon standard etc instead of the bog standards being applied now. Social housing should be being built as the greatest need and can be of good quality as Norwich City Council's recent eco efficient	The policy framework in the draft local plan aims to improve the standard of new homes being built.

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EDCLP/52 Shepshed Town Council	Goldsmith street Council housing project confirms. Houses need to be more sustainable by the use of recycled water system, ground source heat pumps and solar panels.	Noted – the policy encourages the use of low carbon energy generation.
EDCLP/71 William Davis Ltd	The Policy requires green roofs and/or rainwater harvesting systems where viable. Whilst WDL fully supports the notion of sustainability and developing in a sustainable manner the Council have provided no viability evidence itself to support this Policy, which it is required to undertake and publish as prescribed within NPPF Para 34 and the supporting PPG. In the absence of such testing the policy should be amended to note that the Council will encourage rather than require such provision.	Noted – the policy wording is written in such a manner to imply that sustainable drainage systems, green roofs and / or rainwater harvesting systems are examples of sustainable water management solutions. And, the policy is caveated that the objective is subject to these measures being viable. However, in order for the policy to be clear and unambiguous, the policy wording will be reviewed in light of this consultation response.
EDCLP/74 Mr Hussain	 8.18 As I'm sure the borough will have gathered by now my focus is mainly on housing and any considerations will always have that as its fulcrum. However, the mere suggestion of building more and more new homes totally baffles me when we already have so much stock that can be made affordable for everyone. It follows: The housing market is all around us, one only has to go online and it can easily be established just how many properties are up for sale; Consequently, if the govt is saying that it is spending billions on housing and that it genuinely wants to address the crisis, then it is time to show it in a manner consistent with primarily saving the environment from any unnecessary damage, housing people according to their needs & saving money from unnecessary & pointless expenditure "such as spending 300K + on the Charnwood Draft Local Plan when that money could have easily housed a small family unit in order for them to lead a productive way of life, "next family please?" This then is a sustainable way forward because all older properties can be brought up to building more properties unless the builders such as Barratts, David Wilson, Charles Church, and even smaller builders etc are building them for the local authorities directly for better quality home standards that should be introduced for social housing purposes. The current standards for social housing fail to compliment adequate living and living efficiencies for families. Do you think we have missed something? Yes, human dignity 	Noted – retrofitting properties to adapt them to the challenges of climate change, and bringing empty homes back into use, is a corporate priority for the Council.
EDCLP/108 Sue Barry	Eco builds for all new builds with low carbon energy. How do you propose to make it affordable for home owner residents with gas to transfer to electric by 2025? And also to improve insulation, which	Draft Policy LP30 is aimed at driving up the quality and standards of new developments, and ensuring that they mitigate and adapt to the challenges of climate change.

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EDCLP/115 Charnwood Constituency Labour Party	again is costly. Huge cost especially for home owners with middle to lower incomes, young, middle aged or retired. Commercial and industrial development which contain large warehouse type structures shall be required to have green roof structures integral to development. Wild flower green roofs will take their place in the effort to reverse the catastrophe decline of wild flowers and associated insect and bird species across Charnwood.	Noted – the objective to encourage sustainable construction and sustainable development principles applies to residential development and non-residential development.
EDCLP/121 Marie Birkinshaw	Enforcement to get builders to comply is key to this with non- negotiable fines.	Noted – compliance with policy will be enforced through the development management process, and through conditions attached to any subsequent planning permissions.
EDCLP/125 Tim Birkinshaw	Largely OK Do you think we have missed something? How can CBC future-proof the policy (e.g. for new technologies)? Building/site layout and access – walking, cycling public transport, so discourage car use.	The opportunities to implement new technologies when they arise is not restricted by the policy wording. There is the opportunity to explore how building / site layout can encourage more sustainable lifestyles. This consultation response will be used to inform any revision to the policy.
EDCLP/130 Lee Perkins	Commercial and industrial developments which include large warehouse type structures shall be required to have green roof structures integral to the development. Wild flower green roofs will take their place in an effort to reverse the catastrophic decline of wild flowers and associated insect and bird species across Charnwood.	Noted – the objective to encourage sustainable construction and sustainable development principles applies to residential development and non-residential development.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	There are many commendable provisions in this policy but these will be meaningless without monitoring and enforcement. To meet climate change objectives this policy should be strengthened to achieve, not just encourage, very low energy buildings. Consideration therefore should be given for setting targets and dates for achieving zero carbon /carbon neutral buildings and construction.	Noted – compliance with policy will be enforced through the development management process, and through conditions attached to any subsequent planning permissions.
EDCLP/147 Hoton Parish Council	Consider adding a definition of sustainable construction. It is disappointing that there is not a stronger commitment by requiring, rather than just encouraging, development to meet a variety of standards. For example, the preamble states an expectation for high standards of energy and water efficiency which exceed current standards required by Building regulations, but this has not been translated into policy which only 'encourages' development to meet the regulations Why only encourage development to enable low carbon energy generation to be installed at a later stage? The likelihood of this happening is low so why not require this to be installed now?	The policy will be reviewed and opportunities to strengthen the wording of the requirements will be taken.

will the council have over 'minimising construction electing sustainable and efficient building materials'? for the interpretation of this part of the policy would e is support for the policies in this section. Two strong lountsorrel - managing flood risk and sustainable on Plan in these areas should be brought forward. en to Draft Policy LP30 - Sustainable Construction. inst the effect of climate change by expecting all new	Noted. Support is welcomed.
lountsorrel - managing flood risk and sustainable on Plan in these areas should be brought forward. en to Draft Policy LP30 - Sustainable Construction.	
	Noted Support is welcomed
to take account of sustainable development	
at: policy is nowhere near sufficient when considering ales covered by the Draft Plan, and should certainly ed to fit under the LP2 banner of "High Quality d be demanding developments should be near the can be achieved using local builders' merchant to be leading the way to overcoming constructor's inst implementing such elements now. That are far too weak are: raging the layout, orientation and design of higs to improve efficiency ting, cooling and lighting and to maximise the tial for daylight and ve solar gain; raging the design and layout of new buildings enable low carbon y generation to be installed at a later stage, ing district heating; be doing a lot more than "encouraging". You should ig designs which fail to implement currently a best practice. a building to have low-loss walls and triple glazing is ward and gives a passive route to reducing energy	The policy will be reviewed and opportunities to strengthen the wording of the requirements will be taken.
	inst the effect of climate change by expecting all new to take account of sustainable development at: policy is nowhere near sufficient when considering ales covered by the Draft Plan, and should certainly ed to fit under the LP2 banner of "High Quality I be demanding developments should be near the an be achieved using local builders' merchant to be leading the way to overcoming constructor's inst implementing such elements now. that are far too weak are: raging the layout, orientation and design of togs to improve efficiency ting, cooling and lighting and to maximise the ial for daylight and e solar gain; raging the design and layout of new buildings enable low carbon r generation to be installed at a later stage, ing district heating; be doing a lot more than "encouraging". You should g designs which fail to implement currently best practice. a building to have low-loss walls and triple glazing is

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	the installation of solar water heating, PV solar panels for electrical generation and the use of heat pumps to maximise any energy used to heat new buildings. Underfloor heating should be included to maximise heat pump efficiency is also easy to specify and implement at the new build stage.	
	• All of these elements should be required as best, readily achievable practice for all new builds proposed. There are local qualified suppliers/consultants/engineers for such systems, so excuses that sub-contractors to achieve such should be dismissed as erroneous.	
	• These elements do slightly increase building costs, but the % increase is minimal when compared to the costs of the overall building work labour, materials and the cost of land. The relatively small increase is easily recouped by energy usage reduction in short timescales.	
	 An alternative would be to set up a local accreditation scheme for; Architects who can demonstrate they design for current best energy practice Builder's merchants who can show they stock materials that would be used to execute the build of such best practice Developers/Builders who can demonstrate they know how to put the elements together in their practice Accredited building inspectors who can provide assurance that best practice has been used throughout a build project at the normal building inspection stages. 	
	Usage of such accredited persons would go a long way for a developer keen to demonstrate their use of best energy practice at the Planning stage. The other accreditation would ensure the council would be aware that the best practice has been possible throughout and that there has been full implementation through to the development completion.	
EDCLP/187 Jim Smith	On page 102 (LP30), the last bullet point states: "supporting new development that protects environmental resources including local air quality and our most versatile agricultural land." Why, then, is so much land in the countryside	The preferred strategy is one of urban concentration and intensification. The effective use of land is considered through the site assessment work carried out by the Council. Understanding the impact on Best and Most

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	allocated for building?	Versatile Land is a requirement of the NPPF, and is a criterion for helping decide which sites should be put forward for development.
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	The aims and objectives of draft policy LP30 are supported. The design and fabric first led approach set out in the policy will ensure that the best possible site-specific solution are brought forward. Flexibility to incorporate additional water saving and renewable energy generation technologies into schemes where site specific circumstances and viability allow is also supported; as is this information being provided in Design and Access Statements.	Noted – support is welcomed.
EDCLP/218 Emma Holyoak	I would like to see a greater emphasis on the environment. Certainly in relation to developments I think there should be ambitions here to compel developers to put in greener infrastructure such as renewable power generation and charging points for vehicles.	Noted – the policy objective is to encourage sustainable construction and sustainable development. The options identified can be delivered with and through Draft Policy LP30.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	SuDS / green and brown roofs / green walls should be designed to be multifunctional and benefit biodiversity	Noted – the policy framework set out in the draft local plan facilitates this possibility.
EDCLP/226 Eleanor Hood	Again the policy is too weak. 'Encouraging' is not good enough. It must be 'insist'.	The policy will be reviewed and opportunities to strengthen the wording of the requirements will be taken.
EDCLP/192 Severn Trent Water	Severn Trent are supportive of Policy LP30 Sustainable Construction, in particular the references to sustainable drainage systems (SuDS) rainwater harvesting and meeting the optional water efficiency target of 110 l/p/d. These approaches recognise water as a resource, and the need to protect and manage or usage of this vital resource sustainably, by minimising usage, and ensuring that water is returned to the environment in a controlled way and in good condition.	Noted – supported is welcomed.
DCLP-425-470 Environment Agency	The Environment Agency welcome the policy to encourage residential development to meet the tighter Building Regulations optional requirement of 110 l/p/d (as set out in the Planning Practice Guidance).	Noted – support is welcomed.
EDCLP/211 Cllr Margaret Smidowicz	Managing Air Quality We currently measure the quality of our air and particulates. Will the Government Bill going through Parliament require more refined measures? We welcome collaboration with the University as residents continue to have concern on the effect of the incinerator.	Maintaining and improving air quality across the borough is an important issue for the draft local plan. The impact on air quality is a key indicator in the site assessment work and is one of the 10 SA objectives used to shape the local plan.
EDCLP/193	No further comments to those made under 34b	The wording in Draft Policy LP30 facilitates the delivery of solar panels

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Richard Webb	(A requirement for new buildings to have solar panels on all roofs or a large percentage of roof space)	on new and existing buildings.
DCLP/260 National Forest Philip Metcalfe	Given the comments above regarding the NFC's emerging Vision, it would be helpful to discuss further this aspect of the Local Plan with the Borough Council.	The policy will be reviewed and opportunities to strengthen the wording of the requirements will be taken.
	As currently drafted, the policy only seeks to encourage development to take these principles into account. Given the need for urgent action to reduce carbon emissions, the NFC considers that this is not sufficient. Further evidence should be sought which can support more stringent requirements on new development, such as making water efficiency mandatory, requiring on-site renewable energy generation and requiring assessment of new residential schemes against the Home Quality Mark.	
EDCLP/174 Kimborlov Brown	Support	Noted – support is welcomed.
Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	The aims and objectives of draft Policy LP30 are supported. The design and fabric first led approach set out in the policy will ensure that the best possible site specific solution are brought forward. Flexibility to incorporate additional water saving and renewable energy generation technologies into schemes where site specific circumstances and viability allow is also supported; as is this information being provided in Design and Access Statements.	
EDCLP/252 Leicestershire County Council	Q: Do you have any comments on draft policy LP30 (Sustainable Construction)?We would expect to see specific reference within Policy LP30 to incorporating electric vehicle charging infrastructure within the design of new homes/developments	Noted – opportunities to increase the number of electric vehicle charging points is facilitated though Draft Policy LP33.
EDCLP/252 Leicestershire County Council [ENV]	Policy is good	Noted – support is welcomed.
EDCLP/272 Centre for Sustainable Energy	 Whilst policy LP 30 is a good start, it does not go far enough to reduce carbon emissions from new development. The wording should be much stronger than "encourage", and we would advise that policies requiring new development to be net zero carbon be applied. Additionally, whilst it's not wrong, in our view it is seeking to fit 	The Council welcomes the advice provided, and is grateful for the examples and constructive feedback on how to amend the policy.The Council will be reviewing the draft policy in light of these comments.The Council will alter the policy (where necessary) in an attempt to clarify and strengthen the policy wording.

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	 too much into a single policy and would benefit from be divided into several different policies, covering different of climate mitigation and adaptation in greater detail. Our experience suggests that it is not possible to cover issues in sufficient depth through one policy alone. It we possible however to revise this policy so as to be a high cover-all policy, with further detail set out in additional p However rather than start from scratch this policy from which is quite comprehensive might be adapted to suit y authority's circumstances: 	t aspects r these /ould be h level policies. Bristol,
	 Inter_/reversions/encoded/science/inter-i	
	 The design should be sufficiently flexible and adaptable to enable changes of use or layout, and facilitate future refurbishment. Development should must adapt to climate change through measures including: Site-level adaptations, relating to site layout, orientation, massing and the use of green infrastructure (Draft Policy CCS 'Adaptation to a changing climate'); Building-level adaptations to provide for the comfort of occupiers over the lifetime of the development, taking account of anticipated changes in the local climate (Draft Policy CCS 'Adaptation to a changing climate'). These measures should be integrated into the design of new development. New development should demonstrate through Sustainability Statements how it would contribute to mitigating climate change, adapt to its impacts and contribute to meeting targets to reduce carbon dioxide emissions by means of the above measures. 	
	Sustainable Design Standards For major non-residential development, a BREEAM assessment will be required. A BREEAM "Excellent" rating will be expected. For residential or mixed use development consisting of more than 200 residential units, a BREEAM for Communities assessment will be required. A BREEAM Communities "Excellent" rating will be sought. There are a number of other sustainable design standards and methods that are available covering a range of development types, including new homes. Where relevant, the voluntary use of methods such as PassivHaus certification to support compliance with Draft Policies C21-CC54 will be encouraged. Water Efficiency Development of new homes will be expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standard of no more than the expected to achieve a water efficiency standa	
	On a general point, this policy could itself be made stronge "must" rather than "should" as amended above.	er, to say
	Different approaches for mitigating carbon emissions from l are adopted by different authorities but typically comprise e performance / energy efficiency policy, comprising minimur efficiency levels beyond building regulations, binding require	energy m energy

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	for on-site renewable energy and payments into a carbon offse fund to achieve overall carbon neutrality. The Green Building Council policy playbook includes a number of different example energy performance standards adopted by different councils: www.ukgbc.org/wp-content/uploads/2018/09/The-Policy-Playb vJune-2019final.pdf Climate Change Mitigation – Minimising Greenhouse Gas Emissions The most ambitious and all-encompassing zero carbon policy which we are aware is that from the draft London Plan, which	es of ook- of
	 now gone through examination without major amendments. Example policy - Draft London Plan Policy S12: Minimising greenhouse gas emissions https://www.london.gov.uk/sites/default/files/draft_london_plan_: showing_minor_suggested_changes_luly_2018.pdf 'A Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy: Be lean: use less energy and manage demand during operation. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site. An jor development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. C A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major residential development. Residential development should achieve 10 per cent, and non-residential development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either: through a cash in lieu contribution to the relevant borough's carbon offset fund, or off-site provided that an alternative proposal is identified and delivery is certain. D Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually. 	
	DB Development proposals referable to the Mayor should calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.	

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Different policy configurations of energy efficiency standards, renewables and carbon offsetting have different implications for development viability, and local authorities will often commission a study to consider the right approach for the building typologies found within their area and land values, such as this example from Currie Brown (other companies are available) commissioned for the West of England Authorities: www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning- and- BuildingControl/PlanningPolicy/LP20162036/cost_of_carbon_reduc tion_in_new_buildings_report_publication_version.pdf. The conclusions of the Currie and Brown report will feed into policy choice and also planwide viability testing. If as we hope, you decide to pursue zero carbon policies within your revised plan, you may need to commission this type of work to support your policies. If this is not possible, the Green Building Council policy playbook references viability studies commissioned by different local planning authorities which might help provide part of your evidence base: www.ukgbc.org/wp-content/uploads/2018/09/The-Policy- Playbook-vJune2019-final.pdf	
The government is consulting on revisions to Part L of the Building Regulations. This proposes interim standards to be introduced requiring a 20% or 31% over current part L standards, and stronger regulations which would come into force in 2025, requiring an 80% improvement over building regulations. Alongside this the consultation proposes to remove the powers from LPA's to set their own standards above Part L. We're concerned that these proposed regulations will be weaker than policies already in place in some local authorities, would permit development to be built with lower fabric standards than the existing 2013 building regulations, and proposes to remove the right for Local Authorities to go further. Additionally the 2025 standards will not result in new development being fully decarbonised, assuming instead that the remaining carbon emission reduction will be delivered by the decarbonisation of grid electricity. We would therefore encourage you to respond to the consultation, which closes 7 th February.	
	Different policy configurations of energy efficiency standards, renewables and carbon offsetting have different implications for development viability, and local authorities will often commission a study to consider the right approach for the building typologies found within their area and land values, such as this example from Currie Brown (other companies are available) commissioned for the West of England Authorities: www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning- and- BuildingControl/PlanningPolicy/LP20162036/cost_of_carbon_reduc tion_in_new_buildings_report_publication_version.pdf. The conclusions of the Currie and Brown report will feed into policy choice and also planwide viability testing. If as we hope, you decide to pursue zero carbon policies within your revised plan, you may need to commission this type of work to support your policies. If this is not possible, the Green Building Council policy playbook references viability studies commissioned by different local planning authorities which might help provide part of your evidence base: www.ukgbc.org/wp-content/uploads/2018/09/The-Policy- Playbook-vJune2019-final.pdf The government is consulting on revisions to Part L of the Building Regulations. This proposes interim standards to be introduced requiring a 20% or 31% over current part L standards, and stronger regulations which would come into force in 2025, requiring an 80% improvement over building regulations. Alongside this the consultation proposes to remove the powers from LPA's to set their own standards above Part L. We're concerned that these proposed regulations will be weaker than policies already in place in some local authorities, would permit development to be built with lower fabric standards than the existing 2013 building regulations, and proposes to remove the right for Local Authorities to go further. Additionally the 2025 standards will not result in new development being fully decarbonised, assuming instead that the remaining carbon emission reduction will be de

High Level Adaptation Policy

This companion policy is quite good on high level adaptation

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measures at site and building level

Draft Policy CCS3: Adaptation to a changing climate - Bristol Local Plan Review - Draft Policies and Development Allocations

https://www.bristol.gov.uk/documents/20182/34536/Local+Plan+Review+-+Draft+Policies+and+Development+Allocations+-+Web.pdf/2077eef6-c9ae-3582-e921b5d846762645

Development will be expected to include site and building-level measures to be resilient to future climate change impacts and provide for the comfort, health, and wellbeing of current and future occupiers and the surrounding environment over the lifetime of the development. These measures should be integral to the layout and design of new development and should take the vulnerability of the building occupants into account.

Site-level adaptations

Development should be designed, through its layout, form and massing and through the use of green/blue infrastructure, to:

- Minimise the overheating of buildings;
- Provide comfortable external spaces in hot weather; and

Conserve water supplies and minimise the risk and impact of flooding. The use of green/blue infrastructure should provide multifunctional benefits in relation to climate change adaptation. Where appropriate to its context, this should include the use of living roofs with a sufficient substrate depth to maximise cooling benefits.

Building-level adaptations

Building designs and building-integrated measures should: Mitigate the risk of overheating, ensuring that cooling needs are met sustainably (Draft Policy CCS2 'Towards zero carbon development'); Conserve water supplies;

and Avoid responses to climate impacts which lead to increases in energy use and carbon dioxide emissions

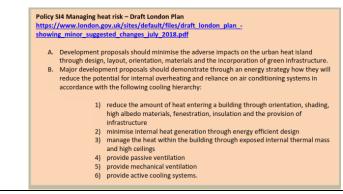
Adaptation strategy

Proposals for development should demonstrate through an adaptation strategy how these issues will be addressed. This should include technical modelling and assessment of the risk of overheating in current and future climate change scenarios.

In considering the likely impact of climate change over the lifetime of the development (particularly in relation to overheating), reference should be made to the most recent climate change projections.

Overheating policy

The plan would benefit from a specific policy in respect of overheating. This approach from the London Plan is quite comprehensive.



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	The plan then refers to Pass / fail guidance from the Chartered Institution of Building Services Engineers (CIBSE) on assessing and mitigating overheating risk in new developments: TM 59 for use with domestic developments and TM 52 for non-domestic developments. In addition, TM 49 guidance and datasets should also be used to ensure that all new development is designed for the climate it will experience over its design life.	
	Draft Policy 30 - District Heating Local Plan policy 30 encourages developments to be planned so as to enable low carbon energy generation and district heating infrastructure to be fitted later. This approach is not sufficient, and will require these buildings to be retrofitted to decarbonise their heating systems soon after their construction, at significant public	
	cost. The NPPF states (paragraph 151) to help increase the use and supply of renewable and low carbon energy and heat plans should identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. The wording of the policy should therefore be strengthened to require developers to install district heating from the start where it is feasible and viable. The Charnwood Renewable and Low Carbon Study appears to identify areas which might be feasible for district heating networks and could potentially be used as the basis for defining district heating priority areas.	
	Policy CP4 from Bath and North East Somerset below is very strong, in that it requires developers to integrate energy planning into master-planning processes, so that the use mix and density of development required to make district heating work influences the form of development proposals coming through at an early stage. As discussed above, the potential for district heating should also be considered when initially allocating sites for housing and we are developing a bid for a tool which might help with this.	

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	 POLICY CP4: District Heating - https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and- Building-Control/Planning-Policy/Placemaking-Plan/cs_pmp_vol_1 district- wide.adf The use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating will be encouraged. Within the three "district heating priority areas", indicated on Diagram 19 (Bath Central, Bath Riverside and Keynsham High Street), and shown in detail in the associated evidence base, development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available, unless demonstrated that this would render development unviable. Within the remaining 12 "district heating opportunity areas" shown on Diagram 19 development will be encouraged to incorporate infrastructure for district heating, and will be expected to connect to any existing suitable systems (Including systems that will be in place at the time of construction), unless it is demonstrated that this would render development unviable. Masterplanning and major development in the District should demonstrate a thermal masterplanning approach considering efficiency/opportunity issues such as mix of uses, anchor loads, density and heat load profiles to maximise opportunities for the use of district heating. Where a district heating scheme is proposed as part of a major development the Council will expect the scheme to demonstrate that the proposed heating and cooling systems (CHP/CCHP) have been selected considering the heat hierarchy in line with the following order of preference: Connection with existing CHP/CCHP distribution networks Site wide CHP/CCHP fuelled by renewable energy sources Gas fired CHP/CCHP Planning Applications within the DHPAs will need to demonstrate how they are incorporating district heating included in pl	

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	 Example policy - London Plan Policy SI3 - Energy Infrastructure www.indon.gov.uk/stes/default/files/defat. London.plan.c showing minor suggested changes.july. 2018.pdf	
EDCLP/277 RPS obo Bellway Homes	 Despite the text/narrative supporting draft policy 30 stating that Council 'expect all new developments to be designed to exceed national sustainable building standards to maximise the use of energy efficiency and energy conservation' (para.8. it is inconsistent with the actual policy which has not embedded this wording of the policy. Developers are wil to incorporate sustainable construction techniques and measures into schemes, however to apply standards that are outside of current Building Regulation standards word be unreasonable and are not justified. Obviously as thes current standards change, they will be implemented 	wording of the requirements will be taken. .19), lling at uld

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	accordingly.	
Q36 - LP31 - Floo	d Risk Management	
Do you have any	comments on this draft policy?	
	with the proposed policy please set out why and what alternative	e approach would you suggest?
	have missed something?	
DCLP/8 Mr Corey Taylor	One of the reasons for the refusal for Gladman Land to build on the site detailed in HS67 was the increased risk of local and down stream flooding,. This risk is even more evident at the moment whilst the whole area is gripped by widespread flooding.	The Borough Council has commissioned a Strategic Flood Risk Assessment which will examine the flood risk of each allocated site within the plan.
DCLP/48 and	With global warming and climate change flooding will just keep	We take the impact of climate change very seriously and have asked the
DCLP/58 Ms Suzanne Collington	getting worse. I strongly suggest you use the flood data and speak to the local flood wardens about how serious this issue is.	consultants undertaking the Strategic Flood Risk Assessment (SFRA) to consider its effect upon flood risk.
	Clean out the brook on a regular basis, clean the drains at least quarterly and put in a flood prevention scheme like Barrow had before you build any more houses or put any more cars through	The results of the SFRA is one of the factors which will inform the selection of sites in the local plan.
	Sileby. I recommend you do not build any more houses in Sileby until you	We note the comments about cleaning drains, flood prevention schemes, and the impact of past flooding events, all of which we recognise are important issues.
	have implemented a flood prevention scheme like the on Barrow had a few years ago. They are flood free now.	recognise are important issues.
	You are not taking into account or listening to villagers about the catastrophic flooding in Sileby. You should listen to the villagers and take note of the Neighbourhood plan.	
DCLP/80 Mr Paul Unwin	As I type, the A6 is closed in Hathern due to flooding. This, alongside the high volume of on-street parking, has brought	We note your comments.
	Shepshed to a standstill as the only route out is Leicester Rd and Charnwood Rd towards the A512.	The Council has commissioned a flood risk assessment which will inform the selection of sites for development in the local plan.
DCLP/100 Mr Dennis Marchant	The policy is supported however, it is felt that the responsibility of householders and landowners to ensure that gardens and ditching remain in good condition to absorb rain runoff and soak away should be stressed.	Agreed that landowners and householders can make a significant difference to levels of run off.
DCLP/189 Quorndon Parish Council	Quordon Parish Council would like to see a campaign to stress the important role that both householders and landowners have in ensuring that gardens and ditching are maintained in a condition to absorb rain runoff and soak away.	Agreed that landowners and householders can make a significant difference to levels of run off. However, any promotional work would be the responsibility of the Lead Flood Authority which is Leicestershire County Council.
DCLP/194 Miss Shirley Dixon	Flooding will increase if green space and land is being constantly built on, despite works builders may do.	The draft policy specifically includes reference to the fact that development on greenfield sites should not cause a net increase in the rate of surface water run off. In addition Draft Policy LP32 promotes the
	Keep what green space and farmland we have left in Rothley tp	use of sustainable Drainage Systems to minimise and slow surface water

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	reduce further flooding.	run off.
DCLP/203 Mr Mrs K M F	 We have raised objections in the past to new housing developments to the top of Barkby Rd Syston due to the impact of traffic, lack of services, schools, doctors, flooding etc and agree with concerns others have raised. On this occasion we will be more specific with our concerns / questions. Question A : Will surface water once again be directed to Barkby Brook either directly or via water balancing tanks/tables? Question B : Will new sewage pipes for these new developments be laid with a direct route to Wanlip Sewage Works or simply be connected (again) to Syston's existing sewage pipes which are already overloaded and potentially a hundred years old! Question C : Who will take responsibility? STWA and LCC have neglected their responsibilities to residents so far leaving surface water outlets into the Brook unchecked, not maintained, collapsed and blocked, with a knock on effect to residents with flooding ! Continual sewage blockages due to the sheer volume of sewage traffic with so far unexplained high water flows!! Question D. With climate change we are experiencing more rainfall, so why are existing systems not being maintained, replaced to accommodate this? 	We will ensure that an evidence based approach informs the choice of sites for development. With respect to flood risk we have commissioned a Strategic Flood Risk Assessment. Many of the issues raised in questions are practical issues relating to water and sewerage management and are the responsibility of a number of different organisations including Severn Trent Water and Leicestershire County Council. We will continue to work collaboratively with these organisations to find sustainable solutions.
DCLP/406 Cllr Colin Hamilton	As flood risk is likely to be an increasing problem for Charnwood, I would reflect on whether the policy could be strengthened with regard to greenfield sites. Rather than requiring developments on greenfield sites to cause no net increase in surface water run off, it	Consideration should be given to the supporting policy on Sustainable Drainage Systems. Amongst the many benefits of tree planting is their important role in

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	could be strengthened to "seek to secure a decrease in the rate of water run off and as a minimum cause no net increase". There is also an opportunity to link this with draft LP23 (tree planting) as the strategic planting of indigenous vegetation will contribute to decreasing the rate of surface water run off.	retaining water.
DCLP/423 Mr Martin Smith	I don't believe the policy is correctly implemented or is wide enough. SUDS drainage is not reliable or always suitable. Wider watercourse management should be looked at.	Comments are noted. SuDS provide arrange of options for water management which may be tailored to the location and site characteristics. We agree that watercourses need to be considered across wide areas and our flood risk assessment will have regard to this.
LDCLP/02 Anonymous	Don't build on flood plans and build soak aways etc More soak aways and drainage to be reviewed and developed based on housing needs Manage the drains and give them attention.	Our Strategic Flood Risk Assessment will consider these issues. The Local Plan includes a policy on Sustainable Drainage Systems which facilitates multi functional benefits and reduces and slows run off.
LDCLP/15 Anonymous	There does seem to be a tendency to still build in flood zone areas. In recent times roads in Loughborough are flooding for the first time and yet more housing is to be built in the area. You are not taking into consideration tributaries like the Woodbrook and Blackbrook that also flood nearby green spaces and if further housing is built (as planned) flooding in these areas will escalate. Building on HS36 is in a flood zone and prospective house owners may have difficulty in obtaining home insurance. The green space adjacent to this area (Pignut Spinney) currently just about copes with the run off from rain from the adjacent fields at present and to build on the two fields nearby will exacerbate the issue. The green space will then be unusable if it's to be the only green space for that area defeating the object of the idea of green areas of separation, particularly as the Council's contractors don't maintain the space well as it is now and the council don't seem to check up	Comments are noted. Our Strategic Flood Risk Assessment will consider the issues that are raised including the potential effect of development on the Woodbrook and Blackbrook. Specific comments on HS36 will be taken into account as part of our considerations for that allocation of that site.
LDCLP/22 Anonymous	on it. Improving the path of mile lane is not sufficient or understanding the needs of the community around that landscape. The Council should be held responsible for any flooding both of houses/dwellings and farm land that occurs as a direct result of new housing developments.	Comments are noted. We take the threat of flooding very seriously. Our approach is evidence based on a through Strategic Flood Risk Assessment followed by a Sustainability Appraisal which will consider the full range of issues.
LDCLP/34 Anonymous	The planting of trees in such locations could alter frequency of flooding – trees take up remarkable quantities of water.	Comments are noted. We agree that tress can help to reduce flooding through their capacity to retain water.
LDCLP/51	The proposed developments will all continue to put pressure on the	Our Strategic Flood Risk Assessment will inform the selection of sites for

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Anonymous	drainage system flooding in Charnwood will get worse with the present building plans. More thought/building and improving of unseen infrastructure	development.
	before any more new green site building.	
EDCLP/34 Cllr Mary Draycott	The building of new homes has seen more concreting of surfaces and rain water has nowhere to go resulting in flooding. New schemes should be flood resilient piping, larger gulleys more soak areas and no more building on any flood plain.	Comments are welcomed. Our Strategic Flood Risk Assessment will inform the Local Plan's policies for flooding and sustainable drainage. The policies will be implemented for development decisions soi as to reduce the risk of flooding and increase resilience.
	Any more development needs to state gardens are not covered by concrete but by materials that allow water to drain away. In the meantime housing needs to be prepared for flooding. For example ground floor electric plugs not low down, wall surfaces that can cope with flooding etc.	
EDCLP/74 Mr Hussain	8.29, What are you proposing to develop if land is not available in areas where there is no flood risk?	We note your comments regarding the local plan's consideration of flooding.
	8.30 What exactly is the Exception Test and how is this measured against proposed risk?8.31 It really depends on what is being proposed to develop & how	The Borough Council commissioned a Strategic Flood Risk Assessment (2018) which informed the choice of sites allocated in the Draft Local Plan and this assessment work is being updated to provide more detailed assessment of any sites which may be located in areas subject to flood
	much of this proposed development is an impact on the environment?	risk.
	8.33 What ecological benefits are you suggesting & how long before such benefits noticeably take effect if, that is, any such a proposed development is sanctioned?	We are following the approach set out in the The National Planning Policy Framework which sets out the Sequential Test and the Exception Test.
	8.34 We first need to establish what the borough is proposing to develop in any potential higher risk area and do the ends actually justify the ethical means?	The Exception Test can be applied where it is not possible or consistent with wider sustainability objectives, for the development to be located in zones with a lower risk of flooding. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk and the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible will reduce flood risk overall.
		The ecological benefits would depend upon the nature of each planning application and the characteristics of the area.
EDCLP/86 Rothley Parish Council	The annual flooding of minor roads crossing the River Soar has a significant adverse impact on road transport between Rothley and neighbouring villages to the east of the river. These roads also provide important alternative routes when the major roads are	Comments are welcome. We will work closely with Leicestershire County Council in their role as Lead Local Flooding Authority and Highway Authority to resolve issues such as these.

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	busy. Additional flood defences to protect these roads should be a high priority in the Local Plan.	
EDCLP/108 Sue Barry	There should be no more building on greenfield sites.	We appreciate your comments and will take them into account in reviewing the plan.
Sue Darry	Regular cleaning of drains is needed as they get blocked with grit etc.	
	There should be less concrete and tarmac areas.	
	More trees should be planted as a way of managing this.	
	Unfortunately it's looking like this is an ongoing climate change issue which we are contributing to with building up of density of areas plus more intense rainfall.	
	This is a number 1 issue as affects so much else.	
EDCLP/121 Marie Birkinshaw	Flood management can offer real biodiversity opportunities and can promote wildlife and specific named species.	Agreed.
EDCLP/125 Tim Birkinshaw	Specific mention of trees, wooded areas and wetlands as a means of regulating water flow and retaining water, hence reducing peak flow risks.	Comments are welcome and will be considered as we make further changes to the plan.
EDCLP/143 CPRE Leicestershire	Flooding is already a concern with 12% of the Borough in areas with the highest risk of flooding (Flood Zone 3).	We note your comments regarding the local plan's consideration of flooding.
and its Charnwood District Group	The problems arising from excessive development in the Soar and Wreake Valleys are evident without resort to Sequential Tests, Flood Zone projections and Flood Risk Assessments. Traffic disruption and the threats to persons and property are	The Borough Council commissioned a Strategic Flood Risk Assessment (2018) which informed the choice of sites allocated in the Draft Local Plan and this assessment work is being updated to provide more detailed assessment of any sites which may be located in areas subject to flood risk.
	obvious now and predicted to worsen as extreme weather events become more frequent. Mitigation measures are not working and fail to control surface water run off due to the accelerating loss of undeveloped land capable of absorbing excessive rainfall.	We are following the approach set out in the The National Planning Policy Framework which sets out the Sequential Test and the Exception Test.
	LP31 should therefore discourage further building on new sites within the flood plain having regard to the evidence of recent flood events. We accept the need for a risk-based sequential approach to the location of development. However, we are concerned about the statement in para. 8.29 in which it is implied that sites at risk of	The Exception Test can be applied where it is not possible or consistent with wider sustainability objectives, for the development to be located in zones with a lower risk of flooding. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk and the development will be safe for its lifetime taking

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	flooding may be "allocated for development if there is no other land available in areas of little or no flood risk". In our view, there should be a prohibition on development in such a situation rather than an Exception Test.	account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible will reduce flood risk overall.
	To do otherwise, could mean an increase in the number of houses being built at risk of flooding with all the distress that flooding causes. If a policy of allowing development in these circumstances is to be pursued, then LP31 should include a requirement for flood resilient design of homes and the preservation of water permeable landscaping as a condition of any consent.	
	However whilst flood resilient construction may safeguard individual developments the result will be more homes in the flood plain and given the changing nature of weather patterns, this will add to the risk and severity of flooding, potentially over a wide area. Flood risk assessment of a proposed development should not just be about the flood risk to the site itself but about risks to other locations away from a particular development.	
	Development in flood risk zones and in some catchment areas, however well mitigated, could increase flood risk as it will impact adversely on flood plains. Mitigation measures required to protect individual development sites do not address the wider problems, including disruption to travel, as recent flooding episodes demonstrate. There needs to be a stronger emphasis on the cumulative and wider impacts of development on flood risk at vulnerable locations across Charnwood.	
	Rather than merely achieving "no net increase in the rate of surface water run off (sic)", greenfield sites, like brownfield sites, should be required to achieve a decrease in the rate and volume of surface water run-off.	
	In para. 8.33, it is suggested that "the creation of new habitats, including woodlands, planting of trees and reconnecting rivers to natural flood plains can all be used to reduce flood risk naturally and provide ecological benefits". This implies more than just suitably managing the natural environment and major watercourses "to help reduce flood risk". Policy should provide for a more positive ecological approach to managing flood risk.	
EDCLP/157	There is support for the policies in this section which cover two	The comments of Mountsorrel Parish Council are welcome.

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Lorraine Davies Mountsorrel Parish Council	strong priorities for Mountsorrel - managing flood risk and sustainable travel. An Action Plan in these areas should be brought forward.	
EDCLP/165 Dr S.J.Bullman	Planning permission for permanent buildings has too often been given in the past. This undermines credibility in the planning process, and causes direct cost when public resources have to be used to help mitigate the result of flooding.	The Local Plan sets out a planning framework to guide development to 2026. The policies of the plan will be informed by a Strategic Flood Risk Assessment
	Draft Policy LP31 omits the dominant issue of insurance. It matters not what flood risk is assessed by developer hired experts if insurance experts disagree.	The availability and cost of house insurance is an important consideration but it is not aland use issue that the Local Plan can directly take into account.
	In many instances, properties become uninsurable if they are located in perceived flood areas, leading to reduced property values and/or inability to sell the buildings so built, leading to significant losses for such property owners.	
	The planning process should add a criterion about insurance-based flood risk. Where domestic properties are proposed where flood-risk insurance could not be put in position, such applications should be refused.	
EDCLP/187 Jim Smith	Chapter 8 (Climate Change) refers to flood control mitigation measures. May I suggest that instead of trying to make changes that would allow building on existing flood lands (such as dredging the rivers and building up the river banks), the example of other parts of the country be followed that hold back rain water so that it enters the water courses in a controlled, progressive, way.	We welcome your comments. Our Strategic Flood Risk Assessment will inform the Local Plan. We also work closely with the Environment Agency, Leicestershire County Council and other partners with respect to the issues raised.
	Paragraph 8.27 (page 103) states that "water predominantly follows topographical flow paths". Does this simply mean that water flows downhill?	Our policy on Sustainable Drainage Systems will promote development which retains and regulates the flow of water into watercourses. The wording of paragraph 8.27 will be reviewed.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife	Paragraph 8.33 links to LRWT's Soar and Wreake Living Landscapes project which is a long-term, landscape- scale project. This project should be mentioned in this paragraph.	Comments are noted and will be taken into account in further changes to the plan's wording.
Trust	The measures in Draft Policy LP 31 should include natural flood management.	
EDCLP/226 Eleanor Hood	Can the population rely on you to deliver this policy?	The Local Plan will set out the framework for the development of land in Charnwood to 2036. However, we need to work with other public organisations who have flood risk responsibilities such as the Environment Agency and Leicestershire County Council. Our policy

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EDCLP/246 Andrew Collis	Bullet point 1 of the policy directs major development to Flood Zone 1.	would be delivered through development management decisions. We note your comments which will be taken into account in any revisions which are required to the wording of the plan.
Gladman Developments Ltd	 Bullet point 2 of the policy sets out the requirement for developments to "consider the cumulative impact of proposals within or which affect, local areas susceptible to flooding." It is unclear as to why this is a policy requirement, and as such, Gladman objects to this part of the policy. Bullet points 3 and 4 of the policy seek to ensure no net increase in surface water run-off for greenfield developments, with brownfield sites requiring a reduction in run-off rate. As such, provided that a development can be shown to adhere to these requirements and do not result in increased flood risk elsewhere then such development should not be refused for reasons of flooding and flood risk. The adoption of the Council's approach may result in a barrier to development in areas of the Borough which broadly are at risk from 	 The intention of the policy is to direct development to areas with the lowest risk of flooding. Bullet Point 1 restates policy in the NPPF as to when site specific flood risk assessments are required. The cumulative impact of development will be considered in our strategic flood risk assessment. The key issue with respect to bullet points 3 and 4 would be to demonstrate how this would be achieved. The NPPF requires all plans to apply a sequential risk-based approach to development – taking into account the current and future impacts of climate change. Our strategic flood risk assessment will provide the evidence to enable us to do this. It is expected that planning applications would demonstrate that due
	flood risk even if the proposal is not considered to contribute to this risk. This is inconsistent with national planning policy and is not justified by supporting evidence. Beyond this, Gladman do not consider that any planning obligation requiring such betterment could be found to be consistent with the planning obligation tests as listed through Paragraph 56 of the NPPF. The policy is not therefore implementable in national planning policy terms unless the agreement of the applicant is first secured. An application could not therefore be refused for its failure to comply with this requirement where it is found consistent with other parts of the policy.	regard had been had to the issue of flooding and flood risk but the policy does not specifically refer to section 106 contributions as a means to secure implementation.
	Gladman consider that the policy should be revised to set out that any betterment to flood storage capacity or reduced surface water run-off above requirements will be considered positively by the Council in the overall planning balance.	
EDCLP/254 Ian Deverell Turley on behalf of Rainier	Rainier agree that in line with NPPF Paragraph 155 of the NPPF development should be directed away from areas at high risk of flooding.	These comments will be considered as part of the wider considerations of the site.
Developments	The Environment Agency's Flood Map for Planning demonstrates	

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Ltd)	that the majority of the site falls within Flood Zone 1, where there is less than 0.1 per cent (1 in 1000) chance of flooding occurring each year.	
	It is acknowledged that there is a small area of Flood Zone 3 to the west of the site along a brook. Detailed site specific evidence has shown that this is an error in the flood mapping system and this area does not pose a flood risk. Moreover, the design of the proposed development will see the creation of an area of open space along this edge of the site with build development being focussed to the north and west of the site in areas which fall within Flood Zone 1.	
EDCLP/255 Ian Deverell Turley on behalf of Rainier	Rainier agree that in line with NPPF Paragraph 155 of the NPPF development should be directed away from areas at high risk of flooding.	These comments will be considered as part of the wider considerations of the site.
Developments Ltd (Wymeswold)	The Environment Agency's Flood Map for Planning demonstrates that the majority of the site falls within Flood Zone 1, where there is less than 0.1 per cent (1 in 1000) chance of flooding occurring each year. It is acknowledged that there is a small area of Flood Zone 3 to the west of the site along a brook. Detailed site specific evidence has shown that this is an error in the flood mapping system and this area does not pose a flood risk. Moreover, the design of the proposed development will see the creation of an area of open space along this edge of the site with build development being focussed to the north and west of the site in areas which fall within Flood Zone 1.	
EDCLP/259 Severn Trent Water Property Development	It is acknowledged that the site (land adjacent to Severn Trent Water Works, Bottleacre Lane, Loughborough) falls almost entirely within Flood Zone 3. However, the majority of the eastern edge of Loughborough also falls within Flood Zone 3 (as does the adjoining employment area) and if there is to be employment regeneration to directly support the Loughborough East Priority Neighbourhood then development will inevitably have to take place in Flood Zone 3. Furthermore, employment use is categorised as a 'less vulnerable use' in Table 2 of the Government's Flood Risk Vulnerability Classification (Planning Practice Guidance – Flood Risk and Coastal Change). Notwithstanding that employment use is categorised as a 'less vulnerable use', any development would clearly have to incorporate measures to ensure that the flood risk is mitigated in accordance	We welcome your comments. The Council will look at the suitability of the allocation of this site having regard to the full range of planning considerations.
	with local and national planning policy. An initial appraisal has	

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	indicated that up to 10000sqm of floor space could be provided within the southern part of the site with the remainder of the site comprising flood mitigation works. Access would be via a new access off Pavilion Way to the south.	
EDCLP/237 P.Williams	Para 8.33 is good but there is no policy or proposal that relates to it.	Noted. Your comment will be taken into account in reviewing the wording of the plan.
EDCLP/192 Severn Trent Water	 Severn Trent is supportive of Policy LP 31 Flood Risk Management, locating development including the drainage systems where possible outside of area of flood risk is beneficial to the delivery of a more resilient development. We also support the approach to managing surface water on greenfield sites so as to retain greenfield runoff rates. On brownfield sites, opportunities should be sought to reduce the rate of surface water runoff by developing sites where there are opportunities to direct surface water to the most sustainable outfall in accordance with the drainage hierarchy as outlined within Planning Practice Guidance paragraph 80. This approach is also key when redeveloping brownfield sites which may have an existing surface water connection to a combined sewer, as the removal of surface water from this part of the combined sewer will help to develop a more resilient drainage system. 	We welcome your supporting comments and will consider the references to brownfield land.
EDCLP/158 Mrs J Brettle- West	The annual flooding of minor roads crossing the River Soar has a significant adverse impact on road transport between Rothley and neighbouring villages to the east of the river. These roads also provide important alternative routes when the major roads are busy. Additional flood defences to protect these roads should be a high priority in the Local Plan.	Comments are welcome. We will work closely with Leicestershire County Council in their role as Lead Local Flooding Authority and Highway Authority to resolve issues such as these.
DCLP-425-470 Environment Agency	 Paragraph 8.30: We would recommend adding the following wording: "and that there will be no increase to overall flood risk and where possible should look to reduce flood risk to third parties". Paragraph 8.32) We would recommend adding the following wording: "and ensure that appropriate mitigation measures are installed so flood risk is not increased elsewhere, such as level for level floodplain compensation". 	We welcome these helpful comments which will assist us as we refine the wording of the plan.

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	Paragraph 8.34 The Environment Agency would welcome Charnwood Borough Council looking into ways of including developer / private investment to work in partnership to reduce flood risk where opportunities arise.	
	 Draft Local Plan Policy LP 31: We consider that an additional bullet point should be added after the first one and which reads as follows: ensuring a sequential approach is taken within the site, with the highest vulnerability development being located within the lowest flood risk zone(s). 	
	The Environment Agency is not comfortable with the use of the word 'minimise' (any effects of flooding) in the existing 2nd bullet point. Rather, new development should not increase flood risk and should look to reduce flood risk where possible.	
	Regarding existing 5th bullet point: The Environment Agency wouldn't want to see Policy wording which may have the effect of 'discouraging' flood risk mitigation in sensitive locations. For example if a flood risk mitigation is required, but may impact on the local character/environment of location, that it is argued that the flood risk mitigation is not in keeping and therefore argue that they cannot incorporate appropriate mitigation (e.g. raised floor levels).	
	Regarding existing 6th bullet point. The Environment Agency considers that where possible minor developments should also include sustainable drainage systems.	
DCLP-425-470 Environment Agency	We would like to take this opportunity to highlight to you the benefits of adopting an integrated water management approach to development within your borough.	We welcome these helpful comments which will assist us as we refine the wording of the plan.
	The impact of early and integrated water planning in development could have wide ranging benefits. It could help make Charnwood a greener, healthier, safer, and richer and a more pleasant place to live now and into the future.	
	Multi-functional green/blue space, upstream storage and making space for water in a development can greatly improve the quality and sustainability of any development. In addition development can have significant impact on water use and water network capacity, it	

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EDCLP/ 245 Avison Young obo Loughborough	 can affect water resources, waste water disposal and flood risk. To manage these competing demands we recommend an Integrated Water Management approach which identifies issues and engages stakeholders both statutory and non-statutory at an early stage. The Defra sponsored Soar Catchment partnership, tasked with improving the water environment could provide a link to the wider environmental community and so support better development in the district. This policy would appear to accord with national planning policies and guidance on managing flood risk and is supportive of initiatives led by the Environmental Agency to introduce new flood defence schemes. 	Comments are noted.
University EDCLP/239 Jonathon Barratt- Peacock	Much of the Soar Valley area comes to a standstill when it rains due to flooding. The road from the A6 into Barrow takes all of the traffic and queues reach back to the A6. This has been the case for the majority of this Autumn and has made travel very difficult. New housing has exacerbated the problem. Flood defences and roads need to be improved before any more housing is built. In Rothley, Wellsic Lane and Town Green Street flood regularly, ruining houses. What is supposed to be a once in 100 year event is now occurring many times in one year! The flood assessments are obviously very much outdated and need to be redone as they are currently unreliable as a source of information for planning developments. The new houses at Primrose Hill/ Baum Drive in Mountsorrel also flood internally, despite the balancing ponds and flood assessments completed when the estate was built very	We note your views. Flooding is clearly an issue of concern for some local communities and the Local Plan will use an evidence based approach to ensuring that the matter is fully considered in planning new developmwnt.
EDCLP/239 Vivienne Barratt- Peacock	recently. Much of the Soar Valley area comes to a standstill when it rains due to flooding. The road from the A6 into Barrow takes all of the traffic and queues reach back to the A6. This has been the case the majority of this Autumn and has made travel very difficult. New housing has exacerbated the problem. Flood defences and roads need to be improved before any more housing is built. In Rothley, Wellsic Lane and Town Green Street flood regularly,	We note your views. Flooding is clearly an issue of concern for some local communities and the Local Plan will use an evidence based approach to ensuring that the matter is fully considered in planning new development.

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	ruining houses. What is supposed to be a once in 100 year event is now occurring many times in one year! The flood assessments are obviously very much outdated and need to be redone as they are currently unreliable as a source of information for planning developments. The new houses at Primrose Hill/ Baum Drive in Mountsorrel also flood internally, despite the balancing ponds and flood assessments completed when the estate was built very recently.	
EDCLP/233 Billy Richards	There is an ongoing issue surrounding Sileby flooding.	Your comment is noted. The Borough Council is aware of the issue.
EDCLP/211 Cllr Margaret Smidowicz	Managing flood risk has not been satisfactory since this monitoring by Charnwood Borough Council came under the Environmental Agency. The A6 at Hathern has been affected on numerous occasions, and was recently impassable without the 3,200 houses being erected. Are the developments that we are assured on planning applications done appropriately? Bramcote Road for example four floods in the past fifteen years. The drainage systems on Forest Road and Epinal Way/Forest Road continues to flood. Should the EA be responsible for attaching the various monitoring and alert devices to the drains where known floods occur or LCC?	Your comments are noted. We are aware of the locations of flooding events and are working closely with the Environment Agency and the County Council on flood risk issues. Our own Strategic Flood Risk Assessment will enable us to have a better understanding of the suitability of our site allocations for development and a strong policy framework in the Local Plan will assist our consideration of future planning applications.
EDCLP/193 Richard Webb	There is clearly a flooding issue in many of the Charnwood villages. There should be a requirement to improve this by any new development rather than simply "not make it worse"	Agreed. Draft Policy LP31 seeks to ensure that development is directed to areas with the lowest risk of flooding.
EDCLP/252 Leicestershire County Council	Reference needs to be included to reducing impacts for areas of habitat that are vulnerable to climate change as per the Natural England Climate Change Vulnerability Mapping. Ensuring habitats which are vulnerable are in the best condition, to allow resilience to the negative impacts of climate change.	These comments will be addressed elsewhere in the plan.
DCLP 266 Leicester City Council	The City Council considers that the third policy bullet point should read: "requiring developments on greenfield sites to cause no net increase in the rate of surface water run off;".	Comment is noted and will be considered as part of policy refinement.
DCLP 266 Leicester City	As additional growth is proposed in the Soar Valley corridor area (north of Leicester and edge of Leicester area), mitigation	Comments are noted. The effect upon highways is an important consideration alongside effects upon property and risks to life.

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Council	measures, including strategic mitigation measures to increase the number of 'flood free' traffic routes may be required, based on robust evidence to alleviate any flooding related issues along the Soar Valley flood plain area that could impact the performance of the A6 corridor.	
	Alternative routes may carry an increased volume of traffic (when this route is flooded) and this will have impact on the A46 corridor, particularly with traffic entering Leicester on already congested routes.	
Q37 - LP32 - Sust	ainable Drainage Systems	
Do you have any	comments on this draft policy?	
	with the proposed policy please set out why and what alternative	e approach would you suggest?
	nave missed something?	·
DCLP/48 and DCLP/59 Ms Suzanne	Clearing out the existing drainage system would be a good start!	Comment is noted.
Collington		
DCLP/96 Mr Dennis Marchant	The policy is supported.	Support is welcomed.
DCLP/234 Mr Gideon Cumming	Rather than a requirement to 'consider' the inclusion of SuDS there should be a requirement to include SuDS at the masterplanning stage.	Comments are noted and will be considered. Any wording changes will have regard to the NPPF which specifies that major development should incorporate sustainable drainage systems unless there is clear evidence that this would be in appropriate.
DCLP/291 Natural England	Natural England welcomes this policy particularly the recognition that there are valuable opportunities to enhance the biodiversity value of a site through the use of SuDs.	Support is welcomed.
LDCLP/02	Keep them clear	Comments are noted.
Anonymous	More drain management	
LDCLP/34 Anonymous	Every effort must be made here.	Comment is noted.
LDCLP/51	They are all at capacity as this autumn has proved stop any more	Comment is noted.
Anonymous	building in low lying areas (Soar Valley). Regenerate already brown field areas before any more green area destroying.	
EDCLP/74	8.39 Are you proposing what will be a very high cost for more	
Mr Hussain	pedestrianisation whilst we have a major housing crisis going on? Where is the greater consideration here?	
	8.40 I'll agree to this, once people have been adequately housed in	

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	accordance with modern day demands and needs, then you can design cycling & footpath routes; at the moment this does not take precedence regardless of how fit and healthy & the reduction of vehicle transportation. Housing1st cycling after.	
	8.41 Shall we ask the homeless people that sit in our town centre or, the families living in overcrowded situations if they would like to see better signage for safe well-lit routes and increased connectivity or would they prefer an adequate roof over their heads with all modern standards of living? The ends do not justify the means when there is a higher crisis going on all around us.	
	8.45 Connect nothing, housing 1st then connect whatever you want to once the most important thing in an individual's life is duly given, i.e. a proper fully functioning home. "The purpose of human life is to live happily and to prosper, the function of government is to provide the conditions to allow that to happen". #Housing1st, choo choo trains after.	
	8.46 The only partners our borough needs from this very point are the SME construction firms who can deliver homes. Transport can wait until homes are adequately provided for. Don't waster our money on nonsense when we have a moral emergency in the borough.	
	8.47 People can be 5 or 10 minutes late getting to their destination, it is not a priority above housing to improve what we can already make adequate use of for the next few years. Housing is a must which must be seen to be done. #DontWasteOurMoney	
	8.48 You hit the nail on the head "Sense of Place", what sense of place do the homeless have or the families who are living in diabolically overcrowded conditions or somebody's daughter who has become the victim of an abusive relationship, how does the borough's "Sense of Place" take precedence until the aforementioned human beings achieve their very own sense of place in order to appreciate the borough's direction for its sense of place in accordance with its Draft Local Plan?	
	8.49 The homeless walk a lot, perhaps they need to be discouraged from all of this type of unnecessary walking wouldn't you agree?	

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	8.50 Promote housing and nothing else, this first has to be resolved before you start throwing good money after bad. Housing and adequate housing is the plan, now how do you intend to resolve it? Which individuals actually care about cycling when they have no home? Healthier lifestyles can only follow on from a grounded perspective otherwise the mind is constantly distraught and cannot become productive.	
EDCLP/108 Sue Barry	Make sure serviced regularly	Noted
EDCLP/121 Marie Birkinshaw	Valuable wildlife conservation opportunities, as above [Q36]	Noted
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	We agree with the policy but ultimately SUDS discharge into overloaded watercourses and are not a complete safeguard against flooding.	We welcome you support and note your observation.
EDCLP/147 Hoton Parish Council	Hoton Parish Council is pleased to see a comprehensive policy for SUDS and supports the requirement for them to provide multifunctional benefits.	We welcome your support.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	Similarly there is support for the policies in this section. Two strong priorities for Mountsorrel - managing flood risk and sustainable travel. An Action Plan in these areas should be brought forward.	We welcome your support.
EDCLP/187 Jim Smith	The planning applications that I have recently seen for this area have SuDS that are designed to cope with rainfall that occurs as a 1 in 100 year event. This design criterion is clearly no longer adequate as we have seen this year (2019) sustained rainfall above this level for days on end.	We welcome your comments. The effect of climate change on flood risk is being considered as part of our strategic flood risk assessment.
EDCLP/226 Eleanor Hood	No Comment	Noted
EDCLP/237 P.Williams	The policy implies that SuDS are more important in flood prone areas. This is a mistake as action to reduce the 'pulse' of rainfall reaching floodplains is just as important off the floodplains and this is where SuDS can provide most benefits	The draft policy states that SuDs should be included as an integral part of all new major development.
EDCLP/192 Severn Trent Water	Severn Trent are supportive of the inclusion of SuDS within new development and design of SuDS in accordance with the principals outlined within CIRIA C753. We recognise that the Lead Local Flood Authority will be the main consultee directing the delivery of surface water systems on new development systems. But we are	We welcome your comments which will be taken into account in plan preparation.

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	keen to see surface water directed to sustainable outfalls as identified under Response 36 regarding the drainage hierarchy, keeping surface water out of the sewerage system where possible, as it represents the most sustainable and resilient system.	
	We would also encourage the consideration of SuDS early within the planning process, ideally from the outset as this will define natural sub catchments that could utilise source control techniques, managing surface water at source. Severn Trent will be able to adopt some types of SuDS system from April 2020, but not all SuDS.	
	We are developing a guidance document on what SuDS elements can be adopted and the extent of the adoption for different features by Severn Trent as the Sewerage provider.	
DCLP-425-470 Environment Agency	Whilst the Lead Local Flood Authority are now the competent Authority with regards to SuDS, the Environment Agency would suggest that opportunity's for SuDS in Minor developments are also explored. We would also recommend it has be ensured that SuDs are able to demonstrate biodiversity,water quality and amenity benefits.	
EDCLP/239 Jonathon Barratt- Peacock	The new houses at Primrose Hill/ Baum Drive in Mountsorrel also flood internally, despite the balancing ponds and flood assessments completed when the estate was built very recently. SuDS don't appear to be working correctly in this case. I have concerns about mosquitoes breeding on the stagnant water in all of the new housing estates.	Your comments are noted. SuDS need to be adapted to the characteristics of the site.
EDCLP/239 Vivienne Barratt- Peacock	The new houses at Primrose Hill/ Baum Drive in Mountsorrel also flood internally, despite the balancing ponds and flood assessments completed when the estate was built very recently. SUDs don't appear to be working correctly in this case. I have concerns about mosquitoes breeding on the stagnant water in all of the new housing estates.	Your comments are noted. SuDS need to be adapted to the characteristics of the site.
Do you have any	ainable Transport comments on this draft policy?	
	with the proposed policy please set out why and what alternative nave missed something?	e approach would you suggest?
DCLP/1	We support the commitment to securing new and enhanced bus	Comments of support are noted. We are preparing viability, infrastructure

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Mr Toby France Arriva Midlands	services serving major developments to ensure the new development is no more than a 400m walk from a bus stop. When determining the level of support required to secure new or enhanced bus services this should be committed in terms of the level of provision and the duration of financial support - ie a commitment to provide a bus service every 30 minutes for a minimum 2 years after build-out completes. It should not be a fixed cost.	and sustainable transport evidence base studies which will help us to understand the scale and provision of services required. The finer detail of individual services will be assessed and agreed through the master planning and development management processes.
DCLP/8 Mr Corey Taylor	HS67 is unsustainable.	The site selection process has been underpinned by a range of evidence including a sustainability appraisal.
DCLP/48 and DCLP/60 Ms Suzanne Collington DCLP/81 Mr Paul Unwin	The existing travel is not running to time and is not a cheap alternative. This needs addressing before any more extra travel is added! Public transport is not a viable option for most of the people who live in Shepshed. I live in a 1970s estate and am one mile from the nearest 126/127/ & 16 bus stop. The developers criteria of being 800m for a bus stop is notional and bears no resemblance to real life. We deserve better than a technical, tick-box attitude to meeting this need. The current bus route around Shepshed is virtually unchanged from what it was in the 1950s. Major redevelopment of the road system is needed to create a circular route around the town and extend the 126/127 & 16 routes. We are really a suburb of Loughborough and a dormitory town supplying the nearby cities with workers and consumers, yet we feel separate from these economic areas. To a certain extent, previous development and policy has stripped the town of it's identity and economy. I think we now need to focus on building up Shepshed not as a separate, individual community but as part of Loughborough. I would like to see Shepshed with a bus hub to provide a regular bus service to different destinations. Could this be located in the Market Place (outside The Crown/Baron's)? There is no viable bus service leaving Shepshed via Brook St to service Hathern and Dishley side of Loughborough. We are a large enough settlement and are bearing a substantial load of the counties upcoming housing requirements to deserve this. Footpaths around the town are poor or impassable, especially to and from the Forest Street school campus. On street parking chokes the towns major routes in and	The responsibility for running and maintaining commercial services lies with individual operators. Existing services and the need for additional services will be looked at in more detail through the master planning and development management processes. Comments on the problems with existing services and distance to bus stops are noted. We are undertaking a sustainable transport evidence base study which will assess how we can improve the number of journeys being made in the Borough by sustainable transport modes. We will review the issue of sustainable travel in Shepshed (and across all of the Borough) through this study.
	out. Sustainable living and transport can not just be addressed for the new developments. Remedial action is required for previous developments that were poorly catered for and the town as a whole.	

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DCLP/95 Mr Dennis Marchant	The policy is supported.	Comments noted.
DCLP/159 Mr David Campbell-Kelly	The overall commitment in the proposed policy is not strong enough. There needs to be much stronger commitment across the County to integrated public transport improvements	We are undertaking a sustainable transport evidence base study which looks at how we can increase the number of journeys being made by sustainable modes across the Borough. We are also in regular liaison with the City and County Councils on how we can achieve this.
DCLP/170 County Councillor Max Hunt	The Draft Plan transport policy is divided into two separate parts. LP33, the sustainable bit is classified under Climate Change and stands in contrast with the transport policies on the following pages (LP34 and LP35), classified under Infrastructure. Is one is about removing traffic, the other enabling an increase in traffic? There should be no reason not to present transport as coherent policy and post it under climate change unless the authors feel there is a contradiction. Looking ahead to 2036 policies are more likely to divide into local traffic and longer journeys rather than sustainable transport (LP33) and other transport (LP34 and LP35).	The sustainable transport policy looks to improve sustainable travel across the Borough reducing congestion on our roads and reducing CO2 emissions and sits neatly within the suite of climate change policies. The local and strategic road network policy acknowledges that some journeys will still need to be made by car and makes provision for improvements to the road network where required. This is similar to the car parking standards policy. Both sit neatly within the infrastructure and delivery suite of policies. We are also undertaking further transport modelling and preparing sustainable transport evidence which will help us to review and make amendments to the draft Local Plan where necessary.
DCLP/207 Mr John Owens	The policy is weak. It acknowledges poor interchanges and low bus usage but does not address the problems. New thinking is needed to integrate villages and towns with good hubs.	Comments are noted. We are preparing sustainable transport evidence to support the draft local plan as its preparation progresses.
DCLP/240 Mr John Catt	Whilst mention is made of electric charging points for cars, no mention is made about convenient storage and charging points for electric and standard cycles together with mobility scooters. If we are to increase sustainable active travel (good for both the environment and our health) we need to make it the easiest option and reduce the convenience of car travel.	Comments are noted. We are preparing sustainable transport evidence which will look at the potential for electric charging points for cars in the Borough. We will consider whether there is potential for the evidence to assess the potential for cycles and mobility scooters too.
DCLP/318 Mr P Edgley	The policy has no specific measurable targets for reducing car use and improving the quality and take-up of public transport except in the major towns within Charnwood. In the Soar Valley & Wreak villages, for example, bus travel opportunity is relatively limited, unsubsidised (ie expensive) and not well used relative to the motor car. Despite this, a relatively high weighting seems to be attached to its availability in selecting which settlements that are without a full range of local services are suitable for future housing developments. Detailed and sustainable transport plans need to put be in place and enacted before development can take place. Most new house builds, particularly outside of the major towns, will be taken by a younger demographic with a likelihood of multi-car ownership within households and this needs to be addressed.	We will review through evidence we are preparing on sustainable transport and through detailed transport modelling whether it is appropriate to include a measurable target in the local plan. We are liaising with both highway authorities and site developers to understand the transport requirements for new housing developments. New developments will also be supported by transport assessments and travel plans, where necessary, through the master planning and development management processes.

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DCLP/329 Dr Anthony Kay	The Borough Council should work with Network Rail and Train Operating Companies to seek provision of new railway stations at Thurmaston (which would also serve the SUE to north-east of Leicester) and at East Goscote. In fact, this should probably be the subject of a separate policy in the Sustainable Travel section. The policy refers to access and routes for cycling, but makes no	We have liaised with a range of stakeholders on the draft local plan including Network Rail. We are preparing sustainable transport evidence which can consider whether a new station at Thurmaston and East Goscote is appropriate. Comment on cycle storage is noted. This issue will be addressed through
	mention of cycle storage. A requirement of space for storing cycles (at a rate of one cycle per resident, including children) in residential developments should be specified here.	the sustainable transport evidence.
DCLP/376 Mr John Barton	Address the problems of public transport. Buses go where people used to go 40 years ago. There's no bus station where we can see easily what buses are going where. Not many buses go through to the train station. There's no through-ticketing of buses. Buses are too infrequent and journeys take too long. Better to have really frequent services running along main roads. I would rather keep warm walking half a mile to a bus stop and wait 10 minutes than waiting half an hour for a bus from outside my front door. Remember buses never run on time. They just don't. They bunch into threes. They get caught in traffic etc etc. Make it easier and more pleasant for active transport. Buses that run where people actually want to travel. "Buxi"s needed too = flexible taxi/minibus.	Comments are noted. We are undertaking a sustainable transport study which takes into account the potential to increase the number of journeys being made by bus. We are also liaising with local bus operators and will discuss these comments with them. Further detail on specific services will be looked at through the master planning and development management processes, through transport assessments and travel plans where appropriate.
LDCLP/02 Anonymous	More bus routes for the west side of Shepshed If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? More than 20 you'll need! Do you think we have missed something? More electric charging points	We are undertaking a sustainable transport study to understand how we can help increase the number of journeys made by public transport including bus travel and provide for more vehicle charging points.
LDCLP/34 Anonymous	There needs to be a recognised group drawn from bus providers, bus passengers and Charnwood/ LCC administrators to monitor bus services, reliability and needs to regulate sustained performance long term. Everyone who holds a free bus pass, must be encouraged to leave their car at home and use a bus.	Commercial bus services are run by bus operators who are responsible for maintaining their services. We are undertaking a sustainable transport study and the creation of a group of stakeholders to monitor reliability and performance of services will be considered as part of the study.
LDCLP/51 Anonymous	Needs encouraging more than you have proposed. Need green public transport. At the present time and plan it doesn't look sustainable. Less use of cars all the planning is built on making people use them.	We are undertaking a sustainable transport study to understand how the Local Plan can help to increase the number of journeys being made by public transport, walking and cycling.
EDCLP/52 Shepshed Town	Outer developments of Shepshed are not sustainable or environmentally friendly due to the lack of public transport which	The site selection process has been informed by a sustainability appraisal which has considered connectivity issues. We are undertaking

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Council	means more cars on the road. There is no mention of the provision for cycleways, footpaths or bridleways.	further sustainability appraisal evidence and also a sustainable transport study. We will check whether reference to the provision of cycle ways, footpaths and bridleways is made in the local plan as this is an important issue.
EDCLP/71 William Davis Ltd	This Policy requires new dwellings with a dedicated parking space to include an appropriate means to recharge vehicles. Whilst WDL is a in support of the use of electric and hybrid vehicles to assist in the achievement of sustainability, this should be sought via a national standardised approach to building regulations in order to ensure consistency to the housing stock at a National level and maintain quality standards. This notion is echoed within the recent consultation on Electric Vehicle Charging Points (EVCP) in Residential and Non-Residential Buildings, undertaken by the Department for Transport (end date 7th October 2019.) This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in the first half of 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is therefore considered the Council are acting in advancement of emerging Nationalised standards, and any Policy relating to EVCP should be sought post Government proposals.	Comments noted. We will review the DfT's consultation on Electric Vehicle Charging Points to consider the standards being proposed at the national level and how these differ from those in the emerging local plan. Any changes to Government policy will be reflected in the plan.
EDCLP/26 East Midlands Airport	We agree with the statement in Paragraph 8.38 that transport plays an important role in allowing communities to access jobs and services. Paragraph 8.42 recognises that Charnwood has a well connected bus network. The Airport's Skylink bus network provides important connections to Shepshed, Hathern Loughborough and onward to Leicester. The Skylink network operates 24-hours connecting the Airport and communities in Charnwood and further afield in the East Midlands. There is also an opportunity to strengthen the connectivity to the local area, including improved rail services and facilities at East Midlands Parkway.	Comments note. We are undertaking a sustainable transport study which will take into account the airport and public transport connections to and from it.
EDCLP/108 Sue Barry	Make bus/ train fares affordable to encourage use of local transport in both rural and towns for all age groups. Encourage walking, cycling. Lower car useunfortunately it's so unrealistic that we can all afford electric cars. So not sure what the answer is here!!?	Comments are noted. We are undertaking a sustainable transport study to understand how the local plan can help to increase the number of journeys made by public transport, walking and cycling.
EDCLP/115	Bike paths separated from roads integrated to improved local public	Comments are noted. We are undertaking a sustainable transport study

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Charnwood Constituency Labour Party	transport routes will be a requirement. The authority will invest in a fleet of electric buses and build links with neighbouring authorities to discuss joint planning of an integrated electric public transport network. This may include electric trams and train routes with subsidised fares and regular services to make the use of public transport cheaper, and more desirable than driving. This is to improve road safety and air quality in areas such as Anstey, Birstall, Thurmaston.	to understand how the local plan can help to increase the number of journeys made by public transport, walking and cycling. We are also undertaking a separate but related study which looks at air quality.
EDCLP/121 Marie Birkinshaw	As commented earlier [Q2] the idea of an 'excellent and integrated public transport system' in Charnwood Borough remains a pipe dream and much should be done to improve it. European cities and towns offer good examples. It would be brilliant if this could be improved and invested in at the earliest opportunity across the Borough.	We are undertaking a sustainable transport study to understand how the local plan can help to increase the number of journeys made by public transport, walking and cycling. The study will also look at examples of sustainable transport best practice.
EDCLP/125 Tim Birkinshaw	 Highlighting congestion is important; not an easy problem to address. Midland Mainline has not operated the train services through Loughborough for 12 years. The current operator is East Midlands Railway. I disagree with bus network in Charnwood being describes as 'well-connected'. Firstly, we do not have a network, only a collection of largely-isolated bus routes. Secondly, interconnection between places is often poor, even in urban areas like Loughborough (access to station form south-west as an example). I disagree that the train service from Loughborough (especially to Leicester) is poorer now than it was 25-30 years ago. Only the Ivanhoe line is an improvement but is currently only hourly, chronically over-crowded on some services and often unreliable (cancellations, late-running). Do you think we have missed something? A station on the Ivanhoe line in the Thurmaston/Rushey Mead area. Improved rail services between Loughborough and the three nearby cities, especially Leicester. To get improvement on pedestrian and cycle access in new developments CDC will need much more co-operation from County 	We are undertaking a sustainable transport study to understand how the local plan can help to increase the number of journeys made by public transport, walking and cycling. We will consider through the study whether there is a need for a new station on the Ivanhoe Line at Thurmaston/ Rushey Mead.
	Council, who, despite being the transport authority have little useful input into design, beyond style of kerbs! Space to store cycles should be included in all residential developments and (covered) cycle storage space must be provided for all commercial sites.	

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EDCLP/126 Silver Fox Development Consultancy on behalf of Mr. Tony Shuttlewood	We consider that a requirement for 400m accessibility to bus stops across housing developments is too prescriptive a standard to apply. A requirement for electric vehicle charging in all new dwellings with dedicated parking should also be considered on a site by site basis rather than being a blanket requirement for all dwellings.	We note your comment on walking distances and while we appreciate that walking distances are standard measurements which simplify a more complex situation with respect to the capabilities of the individuals, the nature of the local environment and service provision we nevertheless consider that standard measurements are appropriate to guide site assessment work and ensure a consistent appraisal.
		We are undertaking a sustainable transport study which will consider electric vehicle charging points.
EDCLP/130 Lee Perkins	Bike paths separated from roads and integrated to improved local public transport routes will be a requirement. The authority will invest in a fleet of electric buses and build links with neighbouring authorities to discuss joint planning of an integrated electric public transport network. This may include electric trams and train routes with subsidised fares and regular services to make the use of public transport cheaper and more desirable than driving. This is to improve road safety and air quality in areas such as Anstey, Birstall, Thurmaston.	Comments are noted. We are undertaking a sustainable transport study to understand how the local plan can help to increase the number of journeys made by public transport, walking and cycling. We are also undertaking a separate but related air quality study.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	Safety and air quality in areas such as Anstey, Birstall, Thurmaston. General Comment: Policy LP33 presents what appear to be commendable aspirations for sustainable transport alternatives to car usage. It is highly doubtful, however, that the proposed provisions will materially alter the reliance on private cars as the predominant mode of travel and thereby deliver substantial reductions in carbon emissions or improvements in air quality. In broad terms, the policies in LP33 have appeared in past versions of the Charnwood Local Plan over the last 20+ years, and fundamentally little has in reality changed in terms of a modal shift. Car Dependent Development: Part of the problem is a failure to recognise the way in which current planning policies relating to housing and transport inevitably lead to an emphasis on the need for travel by car. 2011 Census data shows that most parts of Charnwood have very high levels of car ownership. The Plan suggests that across the Borough 64% of journeys to work are made by car. This masks areas where the car mode share is often over 80%, and in some places, as high as 90%. Most of the proposed development sites are likely to tend towards this level as borne out by recent developments in similar locations. There is a very high probability that developments already being constructed will be highly car dependent and little sign that other committed developments or	Comments are noted. We are undertaking a sustainable transport study to understand how the local plan can help to increase the number of journeys made by public transport, walking and cycling. We are also undertaking a separate but related air quality study. We will also continue to liaise with our stakeholders, including Leicestershire County Council on how we can improve sustainable transport in the Borough.

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	much more effective measures will be needed to reduce car use in the future and the plan is far too weak in this respect. There is no evidence to show whether the measures that have been introduced so far have materially reduced the reliance on private cars. In the Sustainability Appraisal for this plan (para. 7.8.15), it is acknowledged that Policy LP33 and LP34 might have 'minor positive effects' with regards to a reduction in greenhouse gas emissions. More telling is the conclusion that "whilst they are beneficial policies, they are similar to the existing policy framework and unlikely to lead to a radical change in travel behaviour ." (<i>Our emphasis</i>). There is also an underlying assumption in the SGP that the private car is "likely to remain the dominant mode of travel" from the proposed housing developments to be sited along the A46 Expressway Corridor. (<i>Leicestershire County Council</i> , <i>Scrutiny Commission 6 November 2019, minute 43</i>) Sustainable Alternatives: Another part of the problem is that despite policies which attempt to discourage use of private cars, people still need to travel, for instance, to work, predominately by car. Until they are offered a reliable and viable alternative mode of travel – rail, bus or active travel – that they can easily access and use, nothing will change. Half hourly bus services as suggested in para. 8.43 is not really a way forward especially when the services are not part of a wider fully integrated public transport network. In our view, all development should be within 400 meters walking distance of a bus stop which offers an attractive bus service at 10/15 minute intervals from 0600 to midnight and in many cases provide a more frequent service at peak times. The aim should be to have alternatives oftan are good enough for people to be able to give up owning a car. Instead, public transport options are very often extremely poor due to uncoordinated routes, low frequencies and no semblance of an integrated network. Public transport does not provide an attractive	

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	environs. Leicester's traffic problems arise from poor functioning of the wider transport network and require integrated and sustainable solutions across a wide area. Therefore in our view policy LP33 needs to go further and include a commitment to be working with other Local Authorities and partners for an integrated sustainable and public transport network. Charnwood's support for the Leicester and Leicestershire Strategic Growth Plan (SGP) and the building of a major new road, the A46 Expressway, is not helpful to developing an urgently needed integrated public transport strategy. Instead it is extremely disappointing that the SGP is so focused on new road building which will increase road traffic in and around Leicester, as well as carbon emissions and levels of pollution rather than promoting sustainable modes of transport. <i>Electric Cars:</i> Proposals for more charging points for electric cars are to be welcomed as these cars become more common. Having more electric cars will not solve congestion problems and will not increase public transport usage. Nor will they necessarily reduce carbon emissions as fully as anticipated in some quarters once their manufacture and generation of electricity is accounted for. Hence the provision of renewable sources for energy generation should be pursued.	
EDCLP/147 Hoton Parish Council	Public electric vehicle charging points should be rapid chargers (i.e. 40+kW) and those provided in the home or workplace at least 7kW (i.e. fast chargers). It must be recognised the high cost of using public transport is prohibitive for most families. Affordable public transport, which operates regularly and links villages to places they need to go (e.g. the 'catchment' health centres and schools) is vital if a reduction in the use of the private car is to be achieved. There should be improved pavement links between villages and service centres in rural locations.	Comments are noted. We are undertaking a sustainable transport study to enable us to understand how the local plan can help to increase the number of journeys made by public transport, walking and cycling.
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	Similarly there is support for the policies in this section. Two strong priorities for Mountsorrel - managing flood risk and sustainable travel. An Action Plan in these areas should be brought forward.	Support for the policies is welcome.
EDCLP/165 Dr S.J.Bullman	My comments from Q2 are amplified here: Point 8.38 says "Our vision is that our communities will have better access to jobs and services, with a choice 1061	We appreciate your comments. The suggestions for detailed wording changes will be taken into account as we review the plan. Draft Policy LP3 expresses a clear commitment to sustainable transport

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	to walk or cycle" The word missing is SAFELY cycle Point 8.39 says "Our walking and cycle networks have seen significant investment in recent years," This is both complacent and the word "significant" can be interpreted as specious, when considered as a fraction of the total spend. That fraction of spend should reflect the target/aspiration/goal, not the current journey numbers. Cycle planning is piecemeal and currently vastly underfunded. This needs correcting. Point 8.41 says: "8.41 We will expect major developments in the Borough to make provision for improving and extending our walking and cycle networks and ensuring priority is given first to pedestrians and cycle movements" It is not reasonable or possible to replace every journey by cycle from door to door via new, dedicated facilities. Safe cycle access on communal road system must form the basis of the greater part of cycling mileage for the foreseeable future. In that context, ALL road developments MUST be placing a priority of cycles over motor vehicles to increase both the actual and perceived cycle safety The PRIORITY of cyclists and pedestrians should be relatively increased compared to what it currently is at the junction planning stage. This change in relative priority is absent from the propose policy.	including the establishment of safe and attractive walking and cycling routes. We will work with Leicestershire County Council and Leicester City Council who are the responsible transport authorities to help us achieve this. We will ensure that these authorities are made aware of the specific locations where safety for cyclists is a concern.
	To illustrate the lack of thought made, consider this recent example of road junction changes which gave no sensible options for cyclists, despite giving increased priority for buses: That of the A512 at Ashby Square, going West. A cyclist wanting to proceed along the A512 is forced into the rightmost lane, where there is significant danger from motorists using the leftmost lane to (illegally) go straight on or, worse, deliberately undertake. There is no flagged ability for cyclists to use the (very welcome and required) advance stop section that enables buses to exit the stop and turn right or go straight on as a priority over motorists. Cyclists should be able to access that high-visibility space too. Being able to do so would also give a clear option for how to cycle through the junction and safely turn right into Sainsburys.	

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EDCLP/176 Hannah Post Barton Willmore obo Michelmersh Brick Holdings Plc	This is one example of when MUCH more priority for cyclists needs to be in the planners' mindset when designing such junctions. There are many others that I'm sure the local cyclists group could highlight. Draft Policy LP33 seeks to improve the sustainable transport offer in the Borough. One of the methods of achieving this is a requirement that "new residential dwellings with a dedicated car parking space (excluding apartments and residential care homes with communal parking areas) to include an appropriate means to recharge electric vehicles". The Policy does not suggest a threshold or percentage of a development and at present reads as all new dwellings would be required to have electric vehicle charging points. This is considered to be overly onerous and could impact the deliverability and viability of developments, particularly smaller proposals. Indeed, for flatted developments this requirement is likely to be unfeasible. Further, the draft Policy also sets out a requirement for "all major developments to have robust transport assessments and travel plans and to consider sustainable travel options at the outset so that they form an integral part of the development". Having regard to the provisions of the NPPF (Paragraph 111) which states "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be required to provide a travel plan, and the application should be required to provide a travel plan, and the application should be required to grovide a travel plan, and the application should be required to provide a travel plan, and the application should be required to provide a travel plan, and the application should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed" this requirement is considered to be overly onerous in assuming that all major developments, which by the definition set out in t	We welcome your comments and will take them into account in any amendments we make to the plan. Our draft policy has been prepared in the light of the Government's commitment to phase out petrol, diesel and hybrid cars by 2040 (and possibly earlier). The Government's National Planning Practice Guidance states that the primary purpose of a travel plan is to identify opportunities for the effective promotion and delivery of sustainable transport initiative. This is what the draft policy is seeking to achieve. A development of 10 dwellings or more is likely to have significant transport impacts which should be thoroughly addressed.
	and travel plans. As such, the draft Policy should be revisited to be consistent with national policy.	
EDCLP/178 Mark Rose Define obo Bloor Homes	The intent of Policy LP 33 is supported, but some flexibility is required to reflect the nuances of assessing the merits of specific proposals in relation to sustainable travel. Some sites (for example on the edge of Loughborough) will perform well in terms of the opportunities for active travel to a range of nearby services, facilities and employment opportunities and in relation to access to convenient and attractive pubic transport services (taking account	We note your comment on walking distances and while we appreciate that walking distances are standard measurements which simplify a more complex situation with respect to the capabilities of the individuals, the nature of the local environment and the frequency of services we nevertheless consider that standard measurements are appropriate to guide site assessment work and ensure a consistent appraisal.
	of the frequency, route and destinations). The relative proximity to a bus stop is, therefore, only one consideration to take into account.	We understand that there may be further Government guidance on the roll out of electricity charging points. If the policy framework changes

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	Indeed, people will generally walk further than 400m to a bus stop in the main urban areas if there is then a frequent and direct service available to a key destination.	then this will be reflected in the plan.
	The Government is expected to introduce a standard requirement for electric vehicle charging through the Building Regulations next year in which case it would be unnecessary to introduce a policy requirement within Policy LP33. Notwithstanding that, there are technical feasibility and viability issues to consider in the imposition of a specific requirement and to avoid health and safety issues, charging points can only be provided at dwellings with on plot parking.	
EDCLP/179 Mark Rose Define obo Bloor Homes (HS37)	The intent of Policy LP 33 is supported, but it some flexibility is required to reflect the nuances of assessing the merits of specific proposals in relation to sustainable travel. Some sites (for example on the edge of Loughborough) will perform well in terms of the opportunities for active travel to a range of nearby services, facilities and employment opportunities and in relation to access to convenient and attractive pubic transport services (taking account of the frequency, route and destinations). The relative proximity to a bus stop is, therefore, only one consideration to take into account. Indeed, people will generally walk further than 400m to a bus stop in the main urban areas if there is then a frequent and direct service available to a key destination.	We note your comment on walking distances and while we appreciate that walking distances are standard measurements which simplify a more complex situation with respect to the capabilities of the individuals, the nature of the local environment and service provision we nevertheless consider that standard measurements are appropriate to guide site assessment work and ensure a consistent appraisal. We understand that that there may be further Government guidance on the roll out of electricity charging points. If the policy framework changes then this will be reflected in the plan.
	The Government is expected to introduce a standard requirement for electric vehicle charging through the Building Regulations next year in which case it would be unnecessary to introduce a policy requirement within Policy LP33. Notwithstanding that, there are technical feasibility and viability issues to consider in the imposition of a specific requirement and to avoid health and safety issues, charging points can only be provided at dwellings with on plot parking.	
EDCLP/187 Jim Smith	If the sprawl of development into the countryside outside of the villages is allowed to continue then people will be forced to use private transport even more, not less, which is hardly sustainable. In Sileby the train service does not run on Sundays and the Robert's service 27 bus only runs between Sileby and Loughborough (and not at all on Sundays) and is infrequent. There is little to encourage residents to use public transport, a situation that needs to be addressed.	We acknowledge that public transport does not provide a uniformly high frequency of service to all parts of the borough but the purpose of Draft Policy LP3 is to encourage improvements through promoting sustainable transport for new development within an overall strategy of the plan to encourage development in and around existing urban areas. We note your comments on electric vehicle charging points. We appreciate that there will be a need to greatly increase electric vehicle charging points and will develop policy to this effect.

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	 Chapter 9 (Infrastructure and Delivery) makes no mention of encouraging the use of electric vehicles, although there are a few words on this subject in chapter 8. The current provision of charging points within the Borough is woefully inadequate (other than a few privately owned points, there are 2 points in the whole of Charnwood, in Beehive Lane car park). All new houses should be mandated to have adequate off-road parking, or roads wide enough to allow the easy passage of emergency service vehicles between the parked cars. 	Car parking is an important issue. While Leicestershire County Council is responsible for on street car parking restrictions the Borough Council can use the local plan to set standards for car parking for new development as in Draft Policy LP35.
EDCLP/188 Guy Longley Pegasus on behalf of Taylor Wimpey Strategic Land	The aims and objective of draft policy LP33 are supported. However, element of the policy text as current drafted are not. It is considered that further flexibility is required regarding the following criteria of the policy: "securing new and enhanced bus services serving major developments to ensure the new development is no more than a 400m walk from a bus stop". The approach sets out an overly onerous requirement. In the larger urban settlements an 800-1km walk to a bus stop is not unreasonable. As a result of this policy requirement, developments coming forward beyond this threshold could be required to make amendments/improvements to bus services which are disproportionate to the development proposed and render proposal unviable. It is also considered that more flexibility and innovation is required in the approach of this policy as it may be that emerging technologies present alterative options to standard bus services. Examples would include the introduction of Demand Responsive transport solutions such as Arriva Click as introduced at Lubbesthorpe in Blaby district. The requirement for new residential dwellings with a dedicated car parking space to include an appropriate means to re-charge electric vehicle is supported. Again, there must be flexibility in this approach to ensure that infrastructure is provided that can keep pace with developments in technology and future proof developments as far as possible in order to ensure their longevity.	We welcome your support for the aims and objectives of the draft policy. We note your comment on walking distances and while we appreciate that walking distances are standard measurements which simplify a more complex situation with respect to the capabilities of the individuals, the nature of the local environment and service provision we nevertheless consider that standard measurements are appropriate to guide site assessment work and ensure a consistent appraisal. We welcome your comments about examples of good practice elsewhere and will consider their applicability to Charnwood. We welcome your comments on electric vehicle charging points as we appreciate that there will be a need to greatly increase electric vehicle charging points and will develop policy to this effect.
EDCLP/200 Ian Dickinson Canal & River Trust	Paragraph 8.50 highlights the importance of promoting the health benefits of walking and cycling along with the reduction in road congestion, emissions etc. resulting from a reduced reliance on travel by car. The canal network offers a leisure and recreational	We welcome your comments supporting the promotion of walking and cycling and acknowledge the importance of footpaths can play in helping to facilitate this.
	resource that can be readily accessed by local communities for walking or cycling.	The Draft Policy refers to the preparation of a walking and cycling infrastructure plan which could consider the role of the Grand Union

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	The Grand Union Canal/River Soar Navigation offers a valuable open space in its own right, as well as providing a link to other open spaces and facilities as part of the wider green infrastructure network of the Borough. It offers a real opportunity for supporting and promoting healthier lifestyles and helping to improve the physical and mental wellbeing of local communities by encouraging people to be more active, whether through leisure and recreation (including activities such as canoeing as well as walking or cycling) or offering a more active travelling option that is a sustainable alternative to using private motor cars to access services and facilities.	Canal / River Soar Navigation.
	Policy LP33 could specifically identify the role that the canal towpath can play as part of the wider walking and cycling network; where appropriate, new development proposals should consider whether improvements to the towpath or new or enhanced links to it should be provided to help facilitate greater use.	
EDCLP/207 Guy Longley Pegasus obo Davidsons Development Ltd (Sileby)	Policy LP 33 refers to the provision of electric charging points. The Department of Transport recently consulted on Electric Charging and until the outcome of this consultation is known, inclusion of the requirement in Policy LP 33 is premature. The reference should therefore be deleted. Any provision to be included in future versions of the policy should not be unduly onerous and should involve the provision of a standard charging point.	We understand that that there may be further Government guidance on the roll out of electricity charging points. If the policy framework changes then this will be reflected in the plan.
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	We understand that the requirement to make provision for electric vehicle charging points is being introduced on a standardised basis through forthcoming changes to the Building Regulations. As such, Local Plans should not seek to replicate requirements which are addressed through other regulatory regimes.	We understand that that there may be further Government guidance on the roll out of electricity charging points. If the policy framework changes then this will be reflected in the plan.
EDCLP/218 Emma Holyoak	form part of the whole-plan viability testing, to ensure that the impacts of the policy are fully understood. The requirement should also apply only when it is both feasible and viable to do so. There are mentions of mandating for a (low) percentage of charging points for car parks in Loughborough but this needs to be drastically scaled up to cope with the growing needs in the timescales of the draft plan. I think that charging points should form a much stronger part of planning decisions throughout the residential, commercial and industrial decision making process.	We welcome your comments on electric vehicle charging points as we appreciate that there will be a need to greatly increase electric vehicle charging points and will develop policy to this effect. We also appreciate that the technology is evolving rapidly so will need to ensure that this is reflected in our policy.

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	There is no mention of three phase power supplies being fitted as a requirement to new homes for example. This will form a key part of vehicle charging for the future.	
EDCLP/224 Paul Newton	See my answer to Q20b. The plan should be much more ambitious re switching from cars to cycling/walking infrastructure and green public transport (as in the Netherlands).	We welcome your comments which will be considered in revisions to policy wording. We are always keen to learn from examples of best practice elsewhere and apply them locally if appropriate.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	8.44 – Loughborough station car park is full by 7.30am. The bus going through the settlements along the Soar has had stops cut in Mountsorrel and other villages. This contradicts what is suggested in 8.44.	While these are operational issues it is nevertheless important that we are aware of service provision and usage of facilities.
EDCLP/226 Eleanor Hood	The policy refers only to new developments, it does not address what goes on in older parts of the town, with heavy use of cycles along pavements. Possibly in certain parts of town eg the dual carriageway section of Forest Road, a cycle lane could be installed.	The Local Plan can make significant changes through shaping new development and the sustainable transport routes to support it.
EDCLP/230 Barbara Fisher	"travel by car will remain the only available or preferred option for some journeys & people" No mention made of the fact that for <u>many</u> people, <u>bus</u> travel is the <u>only</u> option!	We accept that this is true and therefore are using the plan to promote alternatives to the private car
EDCLP/246 Andrew Collis Gladman Developments Ltd	Gladman has concerns with this policy as drafted and consider there is need for some rewording. Bullet point 1 of the policy requires new major development to provide walking, cycling and public access to key facilities and services. The policy is trying to ensure that key facilities and services can be accessed via sustainable modes of transport however the current wording does not achieve this as it might be translated to mean that sustainable modes of transport must be provided through such developments. This is unlikely to be possible for most developments especially for public transport giving the need for commercial sustainable and practical services and as a result may lead to some sustainable developments being refused. The bullet point should be revised to read "requiring new developments to be accessible to key facilities and services via walking, cycling and public transport" and is more consistent with bullet point 2 and 3 of the Policy.	We appreciate your comment but the key requirement in this bullet point is access to such services and that could mean either through or within easy reach of developments
EDCLP/254 Ian Deverell Turley on behalf of Rainier Developments	Sustainability is a golden thread running through the NPPF and we agree that developments should be situated in places which are already sustainable and able to promote a stepped change in transport habits making active travel a realistic proposition.	We welcome your support for our approach to sustainable development. We note your comments with respect to land to the east and west of Iveshead Road which will be taken into account as we develop the policies of the plan.

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Ltd)	Land to the east and west of Iveshead Road is sustainably located to the south of Shepshed town centre within walking distance of the wide range of services and facilities provided within the village centre. As set out in Section 1 of these representations, bus stops on Ashby Road provide regular connections to Loughborough (which lies 7km to the east of the site), providing local and national rail connectivity as well as a wide range of services and facilities akin to a large market town.	
EDCLP/255	Sustainability is a golden thread running through the NPPF and we	We welcome your support for our approach to sustainable development.
lan Deverell Turley on behalf of Rainier Developments	agree that developments should be situated in places which are already sustainable and able to promote a stepped change in transport habits making active travel a realistic proposition.	We note your comments with respect to land to the south of East Road, Wymeswold which will be taken into account as we develop the policies of the plan
Ltd (Wymeswold)	Land to the south of East Road is sustainably located to the east of Wymeswold village centre within walking distance of the wide range of services and facilities provided within the village centre. As set out in Section 1 of these representations, bus stops on East Road provide regular connections to Loughborough (which likes 7km to the west of the site), providing local and national rail connectivity as well as a wide range of services and facilities akin to a large market town.	
EDCLP/241 L. Tomalin	There should be far more cycling provision in the local plan. These should go where cyclists actually need to go, should not disappear when needed most and should have priority over cars. Look to The Netherlands or Denmark for examples of how these should be planned. This would help reduce traffic in Loughborough and would reduce the carbon emissions too.	We appreciate your comments advocating greater support for cycling. We are always keen to learn about best practice elsewhere and will consider the scope for its application locally if appropriate.
EDCLP/237 P.Williams	Bullet point 2 well-lit isn't defined and shouldn't mean all night - just as with street lighting.	We welcome your comments on street lighting and tree planting which will be considered as we develop the plan.
	Do highway standards allow for the planting of street trees in new developments - given the benefit of such planting in terms of carbon offsetting, in benefit for the street scene and solar cooling this should be addressed.	
EDCLP/228 Haddon Way Residents Association	Whilst this policy is admirable, we wonder how deliverable it will be. HS31 is more than 400m away from a bus stop and so are HS35, 36 and 37. Our estate is in desperate need of a bus service, but buses are run by private companies. They will only provide a route	We appreciate your comments on the provision of bus services. The Borough Council has to operate within a wider environment but can influence service provision by the private sector through local plan policy.
-	if they see a commercial interest in it. We suggest that developers allocate funding for, at the very least, a brand new trial route, that	It may be possible to make some existing routes more economically viable through serving new development as well as existing

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	doesn't seek to disturb already established routes. These routes should be in place from the moment the first dwelling is inhabited to establish good practice from the very beginning.	development. Each planning application needs to be considered on its own merits.
	These future routes should take in local shops, facilities and give links to further transport links	
	When planning permission was granted for HS31 planners recognised at the time that the development failed on sustainability, as the sustainable travel package issued to new homes would not be able to be used, as the local bus only goes into town and is over a 400m walk away. Yet the development was still passed.	
	The draft policy expects new developments to be near existing transport links, however, HS35, 36 &37 aren't anywhere near bus routes. They aren't near any major roads to take traffic quickly and easily to other parts of the road network. To get to major roads means travelling through warrens of developments.	
EDCLP/203 Leicestershire and Rutland Bridleways	Q38 LP33 Sustainable Transport The Local Cycling & Walking Infrastructure Plan should – as required by the Government in its national plan – include provision for equestrians.	We appreciate your comments and will look at the possibility of referencing equestrian routes in the plan.
Association	We would like to see our wishes for various routes (see LP16 Rural Economy) being specifically included in the Plan as bridle routes are also for cyclists and walkers.	
	Generally, the Infrastructure Plan should positively include horses and certainly not exclude them. See Q24, LP19.	
EDCLP/160 Persimmon Homes	Persimmon Homes are supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach applied through the Building Regulations to ensure a	We appreciate your sharing of detailed knowledge on electric vehicle charging points.
	consistent approach to future proofing the housing stock. Recently a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings was held by the Department for Transport (ended on 7th October 2019).	We appreciate that the technology is evolving rapidly and the plan will also need to have regard to any further Government guidance on the roll out of electricity charging points.
	This consultation proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW	
	obsolete for future car models, 7 kW is considered a sufficiently	

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	future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points fitted under the Building Regulations should be un-tethered and the location must comply with the Equality Act 201 O and the accessibility requirements set out in the Building Regulations Part M.	
	The Government's recent consultation proposed introducing exemptions for developments where installation would not be technically feasible. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings would impact on the electricity demand from these buildings particularly for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply necessity, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of fitting charge points will be higher in areas where substantial electrical capacity reinforcements are needed. In certain cases, the need to install charge points could require significant grid upgrades which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be alleviated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.	
EDCLP/159 C.Mulvaney	38 (a) 8.41 We will expect major developments in the Borough to make provision for improving and extending our walking and cycle networks and ensuring priority is given first to pedestrians and cycle movements.	We note your comments which largely relate to a specific development. The local plan will include new policies which promote sustainable transport . Other policies in the plan set out a new policy framework for biodiversity, tree planting and open spaces.

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	I saw little evidence of this in the Wilson-Bowden plans. 8.49 Working with our local partners, we will ensure that sustainable transport strategies are aligned and investment is targeted to the places where it is needed most in our Borough. We will also work with our local partners to produce a Local Cycling and Walking Infrastructure Plan which takes advantage of walking and cycling opportunities in Charnwood. I welcome the above but am sceptical about this. The plans for the proposed Wilson-Bowden development off Snell's Nook Lane are expected to result in increased traffic and congestion on Forest Road, Nanpantan Road and Snell's Nook Lane. Undoubtedly this will also impact Breakback Lane and be detrimental to the surrounding countryside but the plans for sustainable transport strategies are vague. Making people aware of alternative transport modes is insufficient as a sustainable, active transport plan; infrastructure needs to be built with appropriate cycle lanes and road speeds reduced to encourage cyclists and pedestrians.	
	Keeping green spaces, ensuring adequate provision of green spaces and trees in new developments make an area or route more attractive for pedestrians and cyclists to use.	
DCLP-425-470 Environment Agency	The Environment Agency welcomes the Local Planning Authority's commitment to improving sustainable transport in the Borough.	Your support for sustainable transport is welcomed.
EDCLP/239 Jonathon Barratt- Peacock	Improve bus routes to enable building. Development can take place in the smaller villages, other settlements and hamlets to the north east if a regular bus service is provided. Wymeswold has a good range of services (primary school, 3 pubs, village hall, 2 parks, bowling green, cricket pitch, scout hut, 2 churches, shops, pre-school, pharmacy) so is able to provide an excellent place for families to live if the bus service is improved.	We appreciate your comments. The Borough Council does not have responsibility for planning and support for local bus services, but through the local plan we can encourage development to take place at locations where bus service provision is likely to be more viable and we can encourage developers to contribute to provide for sustainable transport measures as part of development applications.
	Bus service between villages needs to be developed. It is very difficult to travel from Sileby to Mountsorrel or barrow to Rothley on public transport and often necessitates going into Loughborough and out again on 2 different buses.	
	Bus services are not currently within 400m of people's homes. This is essential for people to access the service readily.	
EDCLP/239	Improve bus routes to enable building. Development can take 1071	We appreciate your comments. The Borough Council does not have

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Vivienne Barratt- Peacock	 place in the smaller villages, other settlements and hamlets to the north east if a regular bus service is provided. Wymeswold has a good range of services (primary school, 3 pubs, village hall, 2 parks, bowling green, scout hut, 2 churches, 3 shops) so is able to provide an excellent place for families to live if the bus service is improved. Bus service between villages needs to be developed. It is very difficult to travel from Sileby to Mountsorrel or barrow to Rothley on public transport and often necessitates going into Loughborough and out again on 2 different buses. Bus services are not currently within 400m of people's homes. This is essential for people to access the service readily. 	responsibility for planning and support for local bus services, but through the local plan we can encourage development to take place at locations where bus service provision is likely to be more viable and we can encourage developers to contribute to provide for sustainable transport measures as part of development applications.
EDCLP/233 Billy Richards	Inconsistent, non-direct and poor public transport connecting us to the Sporting Facilities that are supposed to be supporting this community in Mountsorrel and Syston. This lack of access to direct public transport to areas that hold the facilities required by Sileby increases the number of cars per household, on the road and creates more contribution to Climate change. This is recognised and in 8.42 and it is important that more frequent and direct buses connecting Sileby to the Loughborough/Leicester Road on the other side of the A6 where public transport is frequent and better supported.	We note your comments regarding local bus provision. It is important to stress that the Borough Council does not have responsibility for planning and support for local bus services, but through the local plan we can encourage development to take place at locations where bus service provision is likely to be more viable and we can encourage developers to contribute to provide for sustainable transport measures as part of development applications.
	8.40 is a key policy to engage more people to cycle, as mentioned above with the issues affecting Sileby with flooding and in particularly Mount Sorrel Lane this cuts off direct access to Mountsorrel and Cycle Route 6, more importantly the access to Cycle Route 6 via Barrow or Cossington/Rothley is not safe for casual cyclists. Can plans for raised pedestrian and cycleways be looked into to create direct access to Mountsorrel even whilst the road is flooded?	
EDCLP/211 Cllr Margaret Smidowicz	Accessibility and Transport: The M1, Airport etc appears to be very accessible when looking at a map but where will vehicles be parked when they eventually arrive in Loughborough? Access to and from the M1 is horrendous at Peak times. If the Science Park, as intended has potentially 9,000 well paid employees in the coming years will they all be cycling and walking?	We appreciate your comments regarding the length of time it takes to access the M1 motorway and the future transport impacts of the Science and Enterprise Park. You will be aware that Highways England are currently undertaking major improvements at at Junction 23 of the M1 which should will significantly improve accessibility. The Science and Enterprise Park will be a major project for the future economic development of the Borough and we will encourage sustainable transport

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EDCLP/193 Richard Webb	 Accommodation in the Nottingham Road area will be attractive for those using the train. Leicester mentioned as main destination for those commuting out of Loughborough. Is there a percentage for Nottingham? Will there be Improved bus routes? Will LCC be negotiating with the bus providers and also the commuters to Leicester Hospitals when our own is excellent for day time services. Q Is it reasonable or feasible to assume that even with a move to green travel and charging points there will be adequate parking. Q 1 i) Against the background outlined above and statement 'Commuter outflow of 11,589 daily from the Borough (Census 2011)'. What is the inflow in the Borough and specifically to Loughborough? Q v) Will park and ride be an option as recommended in an earlier Parking Study and will there be 'hopper' transport available to Town? Great ideas on electric charging points but 20% of parking spaces may not be ambitious enough due to the shift in the transport industry. I think there should also be an encouragement for greener bus 	 as an integral part of its development. The Borough Council does not have responsibility for planning and support for local bus services, but we do work closely with Leicestershire County Council. Also, through the local plan we can encourage development to take place at locations where bus service provision is likely to be more viable and we can encourage development applications. The roll out of electric vehicle charging points is likely to be one of the most significant challenges over the coming decade and we need to ensure that the local plan sets out the right framework to facilitate this. Our car parking studies have provided evidence on the use of car parks in Loughborough and elsewhere, but on street car parking is an issue for the County Council to address. Similarly, it would be for the County Council to undertake traffic censuses as part of their transport planning responsibilities. Park and ride tends to be more suitable in larger towns and cities, particularly for tourists or for specific events. It is unlikely to be viable in Loughborough. We appreciate your support for sustainable transport. The technology for electric vehicle charging is evolving rapidly and the plan will also need to have regard to any further Government guidance on the roll out of electricity charging points.
DCLP 265 Silver Fox obo Ms J & Ms A Kimber	 I think there should also be an encouragement for greener bus services, electric buses, hydrogen buses etc. Attracting charging station providers to residential, commercial and industrial sites. We consider that a requirement for 400m accessibility to bus stops across housing developments is too prescriptive a standard to apply. 2.12.2 A requirement for electric vehicle charging in all new dwellings with dedicated parking should also be considered on a site by site basis rather than being a blanket requirement for all dwellings. 	 On the foll out of electricity charging points. We note your comment on walking distances and while we appreciate that walking distances are standard measurements which simplify a more complex situation with respect to the capabilities of the individuals, the nature of the local environment and service provision, we nevertheless consider that standard measurements are appropriate to guide site assessment work and ensure a consistent appraisal. The roll out of electric vehicle charging points is likely to be one of the most significant challenges over the coming decade and we need to ensure that the local plan sets out the right framework to facilitate this. We will also need to have regard to any further Government guidance on

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DCLP 266 Leicester City Council	Para 8.40. It is important to note that the City Council and Leicestershire County Council have identified the potential for a new pedestrian and cycle bridge to connect Watermead Country Parks North and South, however the delivery of this route and	the roll out of electricity charging points. We appreciate your comments.
DCLP 266 Leicester City Council	bridge is dependent on a third party land owner. [8.42] It is unclear if this sentence is referring to congestion in Leicester? It is suggested to distinguish the narrative for bus services as Local Services and Inter-Urban Services so that any issues with each of the geographical areas identified are clearly understood.	We will review the wording regarding bus services to see if it can be made clearer. We appreciate the reference to Leicester City Council's proposals for improving connectivity and the possibility that could also serve Charnwood.
	In Leicester, there are plans under the Transforming Cities Bid that will provide greater opportunities to make connected journeys by walking / cycling, bus and rail, to, from and across Leicester. It will also provide public transport, cycling and walking improvements to the corridors north of the city that will help to improve journey time and reliability. This is to encourage people to travel sustainably into Leicester city centre and will further enhance the existing strong commercial public transport network.	
DCLP 266 Leicester City Council	8.44 The City Council considers that the transport bullet point could be strengthened to read: "The current Ivanhoe railway service, which utilises the Midland Mainline, links Syston, Sileby, Barrow- on-Soar and Loughborough with Leicester and Nottingham. This is a popular and well used service, particularly at peak times for commuters. There is a campaign to continue the service to Burton on Trent as an Ivanhoe phase 2. The Midland Mainline railway station located in Loughborough has been improved as part of the Loughborough Eastern Gateway scheme. It is the busiest station in Leicestershire outside the city and provides excellent local and national rail connections in particular to Leicester, Nottingham, Derby, Sheffield and London. There is ample parking at the train station and it is also served by local bus services with good access for walking and cycling.".	We appreciate your suggested wording changes and will take this into account in revisions to the plan.
DCLP 266 Leicester City Council	[8.46] Leicester City Council should also be mentioned as partner. The City Council is keen to improve sustainable transport connectivity between Charnwood and Leicester (given that 84% of approx. 11,500 people commute to Leicester daily from Charnwood). There are also aspirations to transform the Leicester Railway Station and improve connectivity into and around Leicester under the proposals for Transforming Cities Fund.	We appreciate your comments and will ensure that the role of Leicester City Council as a key partner is acknowledged in the plan.

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DCLP 266 Leicester City Council	The City Council has the following observations on the first bullet point in draft Policy LP33:	We appreciate your comments and will take them into account in the refinement of policy wording.
	- It is suggested to include the promotion of Birstall Park and Ride (as well as any new Park and Ride sites that may be delivered in the Plan period) as a sustainable transport offer within draft Policy LP 33. Particularly as 84% of the approximate 11,500 people who travel out of the Borough, head to Leicester (paragraph 6.10)	
	- It is suggested to include the wording 'destinations' in the first bullet point within Draft Policy LP 33.	
	- The first bullet point also states that new major developments will be required to provide walking, cycling and public transport access to key facilities and services. Noting that there is housing growth proposed on the 'edge of Leicester', this has the potential to ensure the best possible access to/from jobs and services/facilities via sustainable modes of travel, into and around Leicester (including orbital links), not just for major developments. As Leicester is the primary centre for jobs and services within the Leicester PUA it means that securing high-quality public transport links into the city centre and other key locations in and round Leicester (as appropriate) will be essential to create a sustainable 'edge of Leicester.'	
DCLP 266 Leicester City Council	The City Council suggests that the second bullet point in draft Policy LP33 includes secure cycle shelters	We agree that the provision of secure cycle shelters can incentivise cycling and will consider additional text in the plan.
DCLP 266 Leicester City Council	The City Council suggests that draft Policy LP33 refers to any smart technology concepts to encourage the use of sustainable transport.	We appreciate your comment and will consider the suggestion.
DCLP 266 Leicester City Council	The City Council suggests that draft Policy LP33 includes the provision of public transport infrastructure required to improve the speed, reliability and attractiveness of public transport. This includes, where appropriate, bus gates, bus priority measures and bus links.	We appreciate your comment and will consider the suggestion.
EDCLP/174 Kimberley Brown Carter Jonas obo Taylor Wimpey Homes	The aims and objective of draft Policy LP33 are supported. However, elements of the policy text as currently drafted are not. It is considered that further flexibility is required regarding the following criteria of the policy: "securing new and enhanced bus services serving major	We welcome your support for the aims and objectives of the draft policy. We note your comment on walking distances and while we appreciate that walking distances are standard measurements which simplify a more complex situation with respect to the capabilities of the individuals, the nature of the local environment and service provision, we nevertheless
	developments to ensure the new development is no more than a 1075	consider that standard measurements are appropriate to guide the site

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	 400m walk from a bus stop". The approach sets out an overly onerous requirement. In the larger urban settlements an 800-1km walk to a bus stop is not unreasonable. As a result of this policy requirement, developments coming forward beyond this threshold could be required to make amendments/improvements to bus services which are disproportionate to the development proposed and render proposal unviable. It is also considered that more flexibility and innovation is required in the approach of this policy as it may be that emerging technologies present alternative options to standard bus services. Examples would include the introduction of Demand Responsive transport solutions such as Arriva Click as introduced at Lubbesthorpe in Blaby district. The requirement for new residential dwellings with a dedicated car parking space to include an appropriate means to re-charge electric vehicle is supported. Again, there must be flexibility in this approach to ensure that infrastructure is provided that can keep pace with developments in technology and future proof developments as far as possible in order to ensure their longevity. 	assessment work and ensure a consistent appraisal. We welcome your comments about examples of good practice elsewhere and will consider their applicability to Charnwood. We welcome your comments on electric vehicle charging points as we appreciate that there will be a need to greatly increase electric vehicle charging points and will develop policy to this effect while also recognising that policy will need to reflect technological developments and any new Government policy.
EDCLP/177 Sue Green House Builders Federation	 Draft Policy LP33 - Sustainable Transport requires new dwellings with a dedicated car parking space (excluding apartments and residential care homes with communal parking areas) to include an appropriate means to recharge electric vehicles. The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings was held by the Department for Transport (ended on 7th October 2019). This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in the first half of 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed apply to car parking spaces in or 	The roll out of electric vehicle charging points is likely to be one of the most significant challenges over the coming decade and we need to ensure that the local plan sets out the right framework to facilitate this. The technology for electric vehicle charging is evolving rapidly and we will need to ensure that this is reflected in the plan. We will also need to have regard to any further Government guidance on the roll out of electricity charging points.

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	adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un- tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M.	
	The Government has estimated installation of such charging points add on an additional cost of approximately £976.	
	The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi- dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.	
	It is the HBF's opinion that the Council should not be getting ahead	

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	of Government proposals for Building Regulations. The requirement should be deleted from Policy LP33. If retained as a policy requirement, the Council should recognise the technical feasibility and viability impacts as identified by the Government. The Council's policy approach should allow exceptions if not technically feasible or viable.	
EDCLP/252 Leicestershire County Council	LP33 requiring new developments to provide well-lit, safe and attractive walking and cycle routes that also offer connectivity for people and nature. Could LP 33 go further and seek to reduce dependency on the private motor vehicle. This will be critical to meeting climate change and air quality / health targets. Also relevant for LP 35	We appreciate your comments. The purpose of Draft Policy LP33 is to promote sustainable transport. We have commissioned our own studies to consider climate change, sustainable transport and air quality and their findings will inform the future development of policy in the plan.
EDCLP/252 Leicestershire County Council	The Sustainability policy LP33 quantifies 400m from a bus stop. This probably exceeds our PT policy.	We appreciate your comment and will take this into account in developing the policy.
EDCLP/252 Leicestershire County Council	We will also work with infrastructure providers to trial new technologies such as street lamppost charging points and rapid charging hubs." Think Policy colleagues were waiting on government guidance on this. Lamppost / street charging, licensing and potential public liability isn't at all straightforward.	We note your suggestions regarding the roll out of electric vehicle charging. The technology for electric vehicle charging is evolving rapidly and we will need to ensure that this is reflected in the plan. We will also need to have regard to any further Government guidance on the roll out of electricity charging points.
EDCLP/252 Leicestershire County Council	The County Council is proactive in supporting sustainable modes of travel. In October 2018, the County Council adopted its new Passenger Transport Policy and Strategy (PTPS) and is currently undertaking service reviews to consider affordable solutions to meet communities' needs. In the context of the PTPS, should be noted that the County Highway Authority is increasingly looking to put the onus on site promoters to come forward with passenger transport proposals appropriate to the scale and nature of their development as oppose to seeking financial payments through S106 agreements. It would be useful if the supporting text to the policy could reflect this. Furthermore, the PTPS recognises the increasing financial challenges of supporting non-commercial, traditional bus services and potentially requires alternative solutions such as demand responsive transport or community initiatives to be explored. As such, the County Highway Authority would look to work with the Borough Council through the planning process to ensure that new development is appropriately supported by passenger transport services.	We appreciate your comments which will be considered as we develop the plan. We agree that our joint work with the County Highway Authority is central to ensuring that new development supports sustainable transport measures and is appropriately supported by passenger transport services.

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	The commitment to pursuing walking and cycling initiatives in conjunction with the Local Plan is welcomed. With regard to the preparation of Local Cycling and Walking Infrastructure Plans, it is important that these are developed around appropriate geographical areas, in conjunction with relevant wider strategies in planning/development, and in partnership with the County Highway Authority and other bodies (e.g. Leicester City Council) where applicable. [Cabinet Report]	
	It is important that any LCWIPs produced across the housing market area follow a consistent, robust approach/methodology to ensure that these are best placed to secure funding for delivery of proposals identified. In practice this may require several geographically focussed LCWIPs rather than a single LCIP for the district as a whole and it would be helpful if the wording within the policy/supporting text could be tweaked to provide flexibility in respect of this.	
	There is little mention of Park and Ride, which is referred to in relation to the North of Birstall SUE but not in regard to 'Sustainability' or 'Parking'. [Cabinet Report]	
EDCLP/272 Centre for Sustainable Energy via Cllr Needham	Policy LP 33 states that new major developments should provide walking, cycling and public transport access to key facilities and services. This is fine, but could still result in major transport generators being located in less central, car reliant locations where sustainable transport infrastructure even if provided would be less used. Instead we'd support an approach closer to that of Bristol or Lambeth below, which aim to direct high trip generating uses to the most accessible locations along main public transport corridors.	We welcome your comments drawing attention to good practice elsewhere, which will be taken into account in preparing the next draft of the local plan.

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	Draft Policy T1: Development and transport principles Bristol Local Plan Review - Draft Policies and Development Allocations https://www.bristol.gov.uk/documents/20182/34536/Local+Plan+Review+: +Draft+Policies+and+Development+Allocations+-+Web.pdf/2077eef6-c9ae-3582-e921-b5d846762645 Development proposals will be located where sustainable travel patterns can be achieved, with more intensive, higher density mixed use development at accessible locations and along or close to main public transport routes. Proposals should minimise the need to travel by private car and maximise opportunities for walking, cycling and public transport. Developments should be designed and located to ensure the provision of safe, walkable streets and reduce as far as possible the negative impacts of vehicles such as excessive volumes, fumes and noise. Proposals should create places and streets shaped by the needs of pedestrians, cyclists and public transport users and where road traffic and parking is carefully integrated to produce a liveable environment	
	 Policy T1 Sustainable travel - Lambeth Local Plan, with changes recommended by CSE www.lambeth.gov.uk/sites/default/files/co-draft-revised-lambeth-local-plan-october-2018-final.pdf a) The council will promote a sustainable pattern of development in the borough, minimising the need to travel, <u>achieving a significant modal shift to sustainable transport modes maximising trips made by sustainable modes and reducing dependence on the private car in accordance with the Lambeth Transport Strategy.</u> b) The council will apply London Plan policy T2, Healthy Streets, to facilitate trips by walking and cycling in order to reduce health inequalities. c) In managing the road network, Lambeth will give priority to traffic according to the following hierarchy and this should be reflected in development proposals: walking; cycling; b) taxis and minicabs; taxis and minicabs; motorcycles/scooters; fright transport; fright transport; ii. private cars. d) Development that generates a significant number of trips will be required to be located in an area with an appropriate level of public transport of trips, or where capacity can be increased to an appropriate level through contributions, where this cannot be achieved through Transport for London or other agencies' funding. e) Development should contribute towards the improvement of access to public transport and the improvement and delivery of local and strategic walking and cycling routes that serve the site. f) The council will apply London Plan policy T4 to the assessment and mitigation of transport impacts, including requirements for travel plans. g) All development should reduce road danger at source by identifying and delivering highway safety measures at and around the development site, including temporary measures during the source source of an account of the development site, including temporary measures during the sou	
	Electric Vehicle Charging Infrastructure Given its largely rural character where public transport, walking a cycling are less feasible, sustainable zero carbon transport within your district is likely to be heavily reliant on the roll-out of electric vehicles. Similarly the generally lower density of development is	

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	likely to make on-plot charging infrastructure more feasible	e than in
	districts reliant on unallocated on-street parking.	
	Therefore the authority should adopt a robust policy requir	
	developments to be equipped with electric vehicle charging	
	Policy LP 33 contains a short reference. This draft policy c	contains
	more detail which might be adapted to your situation.	
	DM16 Emerging policy approach for electric vehicles infrastructure – Bath and North East Somerset Local Plan 2018	
	Overarching principle	
	Require all development proposals to integrate the provision of infrastructure into the design and layout of the development to enable the charging of electric or other Ultra-Low Emission vehicles	
	Residential Development:	
	 All individual dwellings with one or more dedicated parking spaces or garage to include infrastructure for charging electric vehicles. 	
	 Where off street parking is not provided within a development proposal, the design and layout of the development should incorporate infrastructure to enable the on street 	
	charging of electric or other vehicles. • For residential development with communal off street parking provision, at least 20 % of	
	spaces to have active charging facilities, and passive provision for all remaining parking	
	spaces with the layout of the car park ensuring that all spaces can be easily activated with minimal disruption as demand increases.	
	Active/passive charging	
	Preferred approach: Require 100% active charging facilities for all residential development (subject to further work).	
	Alternative approach:	
	At least 20 % of dwellings to have active charging facilities, and the remaining 80% of dwellings to have passive provision.	
	Rapid/fast charging points High density and/or large scale residential/mixed use developments to provide at least one rapid charging point clustered with a fast charging point (number per car to be determined) and the provision of an electric vehicle car club, and provide dedicated spaces for the car club with active charging facilities.	
	Non-residential development:	
	In all non-residential developments providing 1 or more car parking bays, ducting to be	
	 installed to enable provision of charging facilities for electric vehicles. Where 10 or more car parking bays are provided, at least 20% of those bays to provide 	
	 active charging facilities for electric vehicles, and passive provision for all remaining bays. In non-residential development where provision is made for taxis stopping, the taxi 	
	spaces are required to include active charging facilities.	
		•
Chapter 9 - I	nfrastructure and Delivery	
	l and Strategic Road Network	
	comments on this draft policy?	
	with the proposed policy please set out why and what a	alternative approach would you suggest?
	nave missed something?	
DCLP/2	Measures need to be in place to ensure "improvements" to	to the local The plan states that we will work with key stakeholders to maximise the
Mr Toby France	and strategic road network do not have a detrimental impa	
Arriva Midlands	provision and appeal of local bus services. The pedestrian	
	Loughborough High Street resulted in a significant negative	
	on residents changing buses in the town centre, with servi	
		1081

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	dispersed to multiple locations around the town. The waiting environment at The Rushes and Lemyington Street is extremely poor and needs significant improvements in order to make public transport an attractive proposition.	connections by bus and we will work with stakeholders to achieve this through the implementation of the Town Centre Masterplan and through development management decisions.
	Summary:	
	 Concerns raised regarding the effect of local plan policies for the local and strategic road network upon the operation of local bus services. 	
	• The pedestrianisation of Loughborough High Street was considered to have had a negative effect upon bus operations with services dispersed to multiple locations.	
	• The waiting environment at The Rushes and Lemyington Street was seen as extremely poor and in need of improvement to make public transport a more attractive option.	
DCLP/8 Mr Corey Taylor	The roads around HS67 are already very busy, add 500+ more cars on there and they are going to be borderline unusable!! Also, the Rearsby bypass was built at a very high cost to divert traffic away from the area, whereas any development would just put that traffic straight back on to the roads that had become clearer and safer!!	The Borough Council expects that the growth delivered by our strategy to manage the impact of traffic.We will ask Leicestershire County Council to undertake robust transport modelling to ensure that impacts are minimised and appropriate mitigation sourced.
	Summary	
	• Concern raised regarding the amount of traffic in the vicinity of Site HS67, Land off Melton Road, East Goscote which would be exacerbated by development leading to local roads becoming busier negating the benefits provided by the Rearsby Bypass.	
DCLP/48 and DCLP/61 Ms Suzanne	Flooding needs to be taken into account in Sileby and you need to consult with the flood wardens and neighbourhood plan for a flood prevention scheme to stop the congestion in and out if Sileby and	The plan's proposals were informed by a Strategic Flood Risk Assessment which was published in December 2018.
Collington	surrounding villages. The road infrastructure needs development as the existing roads are too narrow to cope with more traffic. Strongly advise you take note of the village traffic surveys and Sileby neighbourhood plan.	Further work on flood risk has now been commissioned to identify the levels of flood risk of all of the sites which we will allocate in the local plan.
	Summary	We are aware of flooding issues in and around Sileby and will work with key stakeholders, in particular Leicestershire County Council in their role as the Lead Local Flood Authority to address the issues.

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	• Emphasises the need to address flooding in Sileby and called for consultations with flood wardens and the neighbourhood plan for the development of a flood prevention scheme for Sileby and surrounding villages.	We will also ensure that the local plan's development strategy is subject to transport modelling to ensure that the impacts upon the local road infrastructure is robustly assessed.
	 Calls for improvements to the local road infrastructure informed by village traffic surveys and the neighbourhood plan. 	
DCLP/82 Mr Paul Unwin	To work in Shepshed, this involves tackling already established developments and road layouts. Road widening is necessary and parking restrictions are needed on the main thoroughfares. Generally, the new developments meet these requirements. It is the poorly provided for previous and historic developments that	Leicestershire Council is the responsible highway authority with responsibility for managing and maintaining roads across the County. We will work with the County Council to seek to resolve existing local transport issues.
	cause congestion and bottle necks. Clear routes in and out of the town and a 'whole town' public transport system should be a priority.	For all new development the Local Plan will seek to reduce congestion and the efficiency of the local transport network through a range of measures including mitigating impacts on the road network and the promotion of sustainable transport.
	Summary	
	• Considers that it will be necessary to tackle problems caused by existing developments and road layouts to reduce congestion and bottle necks by measures such as road widening, parking restrictions on the main through fares and a 'whole town' public transport system.	
DCLP/94 Mr Dennis Marchant	The policy is agreed with and the promotion of sustainable transport is fully supported (see also Q41).	Welcome support for Local Plan policy on the local and strategic road network and our promotion of sustainable transport.
	Summary	
	 Agrees with the wording of Policy LP34 and the promotion of sustainable transport. 	
DCLP/160 Mr David Campbell-Kelly	The SGP is a non statutory document. The alternative proposal for A46 corridor improvements made by Willoughby Waterleys Residents Association needs to be fully explored. The Midlands Connect stage 2 report when issued needs to be fully considered	While it is a non statutory plan the Leicester and Leicestershire Strategic Growth Plan (SGP) has been agreed by all Leicestershire local authorities as a long term vision for growth.
	and to assess all alternatives. Full commitment to infrastructure improvements needs to be given before implementation of strategic growth plan policies are made in any Local Plan	The SGP includes the A46 Priority Growth Corridor as part of the overall spatial strategy. This is a strategic priority but how it will be implemented has still to be determined. Only a small part of the growth corridor would be likely to cover part of Charnwood and its delivery would be subject to detailed partition as part of any planning application process.
	Summary	detailed scrutiny as part of any planning application process.
	Refers to the fact that the Strategic Growth Plan is a non	We are committed to ensuring that infrastructure requirements are fully

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	 statutory plan and the alternative proposals for the A46 Corridor need to be explored. Calls for consideration to be given to the Willoughby Waterleys Residents Association proposals for the A46 Corridor and the Midlands Connect Stage 2 Report. Considers that full commitment to infrastructure improvements needs to be given before implementation of strategic growth plan policies are made in any Local Plan 	addressed.
DCLP/172 County Councillor Max Hunt	The statement that the authority "will reduce [traffic] congestion" and the efficiency of the network is worthy but difficult to understand if the number of journeys, presumably by car, van and heavy goods vehicle, is likely to increase as stated in 9.4. I think the policy would be more effective if it addressed the carbon emissions and cleaner air agenda. Summary	It is the role of the local plan, local transport plans and planning decisions to ensure that sustainable transport is promoted and that any increase in journeys can take place using sustainable transport modes. The criteria within the policy on Sustainable Transport will help to achieve this objective. Further consideration will be given to the way in which the plan deals with the important issues of carbon emissions and air quality.
	 Concerns raised that the policy objective to reduce congestion is unlikely to be achievable in the light of an increase in the number of journeys. Draft Policy LP34 should include reference to carbon emissions and the cleaner air agenda. 	
DCLP/213 Mrs Jenny Moore	The traffic in Loughborough is bad enough without adding to the problem. Epinal Way needs to be sorted. Possibly make it a dual carriageway with bridges to get across or subways. There are too many traffic lights and the traffic does not flow freely.	Leicestershire Council is the responsible highway authority with responsibility for managing and maintaining roads across the County. We will work with the County Council to seek to resolve existing local transport issues.
	Also the police are being allowed to dominate access to Southfields Park from the Bedford Square/Southfields Rd side. There is no reason why the fence which joins the perimeter of the police station to that of the Premier Inn cannot be taken down to give the public free access through from the town. This would result in a link between this park and the Queens Park and open up the town. It would also result in more people using Southfields Park because it would be more accessible to those on foot, such as mother's with small children.	For all new development the Local Plan will seek to reduce congestion and the efficiency of the local transport network through a range of measures including mitigating impacts on the road network and the promotion of sustainable transport.
	Summary	
	 Concerns about current levels of traffic congestion in Loughborough and the need to improve traffic flow on Epinal 	

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DCLP/241 Mr John Catt	 Way. Improvements to the access to Southfields Park are needed to facilitate an improved link with Queens Park. Suggest the policy should begin with: We will reduce congestion and improve the efficiency of our local and strategic road network by: Encouraging the maximum possible level of active travel (walking and cycling) to reduce traffic volumes It seems to have been forgotten that the majority of car journeys are below 5 miles. A distance that is easily cycled. 	Our policy on Open Spaces, Sport and Recreation includes a reference to healthier and more active lifestyles but we acknowledge that it is equally important for the issue to be addressed in the design and layout of all new development.
	 Summary Recommends the inclusion of a new bullet point to the Policy LP34 which reads <i>Encouraging the maximum possible level</i> of active travel (walking and cycling) to reduce traffic volumes 	
DCLP/391 Mr Robin Cooper	 How are you going to cater for the traffic in and around the proposed massive development off Forest road in Loughborough? In the mornings the road is already very busy and at rush hour in the evening it is unusable. Adding 600 homes to this is going to be a serious issue. As far as I can see there is no specific policy here? just general statements about the area. "Development should not have an unacceptable impact on highway safety or residual cumulative impacts which would be severe. " This is far too general, you're going to need to actually look into the areas you are planning to develop rather than just colouring in bits of the map Summary Concerns raised in relation to traffic with respect to development off Forest Road in Loughborough. 	The development strategy of the Local Plan will be subject to transport modelling to fully assess the impacts of all development proposals.
LDCLP/02 Anonymous	 Policy objectives are too general and more detailed assessment of impacts is required. More development and work with LCC Highways 	The Borough Council works closely with Leicestershire County Council who are the responsible highway authority. This will include detailed
Anonymous	Summary	transport modelling for all development sites.

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	Closer working with Leicestershire County Council Highways is needed.	
LDCLP/34 Anonymous	 Recent research has shown that bird population in a given location declines as traffic density increases due to birds re unable to detect birds singing 'for a mate' during the breeding season. Do we really want a silent spring? This situation is drastic and drastic action must be taken. Cars and trucks off the road – more buses and trains – yes please. Summary Calls for cars and trucks off the road and replaced by more buses and trains due to the environmental effects particularly 	Local plan policy requires that sustainable transport proposals are considered first while the supporting policy on Sustainable Transport includes reference to a number of ways in which the plan seeks to improve the sustainable transport offer. The Local Plan also includes a policy on conserving and enhancing biodiversity.
LDCLP/51 Anonymous	upon birds We must wean people of the motor car. Public transport infrastructure spending before anymore building anywhere. Summary	The plan's policies on the Local and Strategic Road Network and Sustainable Transport strongly promote sustainable transport.
	Calls for more spending on public transport before new development is constructed.	Commont is noted
EDCLP/48 Nottinghamshire County Council	I do not have any strategic transport planning observations to make on the draft Charnwood Local Plan. Summary	Comment is noted.
EDCLP/68	No comments We welcome the opportunity to comment on the Draft Charnwood	We welcome the comments from Highways England and will work closely
Highways England	Local Plan (2019 – 36) document which has been produced for public consultation. We understand that the purpose of this document is to set out the Council's preferred development strategy for Charnwood and present draft policies. We note that this consultation follows an Issues & Options consultation in early 2018 and is a further step in preparing the new Local Plan which will replace the Charnwood Local Plan Core Strategy (2015) and the saved policies from the Borough of Charnwood Local Plan (2004). Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network	to ensure that the concerns identified are addressed. Our work with Leicestershire County Council to fully and robustly assess all of the impacts of the development proposals should clarify the scale of the impacts and the mitigation measures that need to be put in place.

 (SRN) It is our role to maintain the safe and efficient operation of the SRN whiles acting as a delayery partner to variational economic growth. In relation to the Charnwood Local Plan, our principal interest is safeguarding the operation of the A48 and M1 which route through the Plan area. Previous consultations on the forthcoming Charnwood Local Plan advised that the Plan was expected to make provision for approximately 24,850 dwellings to 2036 compared to 13,940 dwellings set out in the adopted Charnwood Core Strategy (2011-2028). It is our understanding that the introduction of the new national standard methodology for calculating housing need has now decreased the amount required to 5,930 homes for the plan period up to 2036, once commitments are considered. We also understand that, in order to provide flexibility in the plan, the Council's preferred strategy is to plan for approximately 1,300 additional homes and therefore make provision for a further 7,252 homes over the plan period up to 2036. We note that the proposed option for the distribution of growth proposes a significant amount of development on the edge of Leicester (1,557 new homes) and in the Loughborough/Shepshed areas (1,919 and 2,041 new homes respectively). Growth in theso areas (1,919 and 2,041 new homes respectively). Growth in theso areas in Junding the A46 / A5630 Anstey Lane Growth and housing Fund (GHF) scheme, the M1.323/A512 GHF scheme, the NottingHam Cateway highway mitgations. The M1 is also currently being upgraded to Smart Motorway between M1 Junction 25. There do, however, remain considerable pressures on the SRN within the Brough of Charwood. Herefore sake provements already planned for the area including the A46 / A5630 Anstey Lane Growth and Housing Fund (GHF) scheme, the M1.323/A512 GHF scheme, the NottingHam Cateway highway mitgations. The M1 is also currently being upgraded to Smart Motorway between M1 Junction 23. There do, however, remain considerable pressures on	RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	RESPONSE NO/ CONSULTEE	 (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Charnwood Local Plan, our principal interest is safeguarding the operation of the A46 and M1 which route through the Plan area. Previous consultations on the forthcoming Charnwood Local Plan advised that the Plan was expected to make provision for approximately 24,850 dwellings to 2036 compared to 13,940 dwellings set out in the adopted Charnwood Core Strategy (2011-2028). It is our understanding that the introduction of the new national standard methodology for calculating housing need has now decreased the amount required to 5,930 homes for the plan period up to 2036, once commitments are considered. We also understand that, in order to provide flexibility in the plan, the Council's preferred strategy is to plan for approximately 1,300 additional homes and therefore make provision for a further 7,252 homes over the plan period to 2036. We note that the proposed option for the distribution of growth proposes a significant amount of development on the edge of Leicester (1,567 new homes) and in the Loughborough/Shepshed areas (1,919 and 2,041 new homes respectively). Growth in these areas is likely to impact on the operation of the M1, specifically between M1 J21A and J24, and on the A46. We are aware of a number of road improvements already planned for the area including the A46 / A5630 Anstey Lane Growth and Housing Fund (GHF) scheme, the M1 J23/A512 GHF scheme, the Nottingham Gateway highway mitigations. The M1 is also currently being upgraded to Smart Motorway between M1 Junction 23A and Junction 25. There do, however, remain considerable pressures on the SRN within the Borough of Charnwood. We consider it important for the Council to ensure that there is sufficient infrastructure capacity to accommodate the proposed growth. This includes adequate capacity on the SRN to ensure the safe and effici	OFFICER RESPONSE

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	We would also expect the Local Plan to set out the need for large development sites to be supported by a Transport Assessment to understand likely traffic implications upon the operation of the SRN. We trust that the above is useful and would welcome ongoing engagement with Charnwood Borough Council as the new Local Plan progresses.	
	Summary	
	 The Highways Agency notes that the significant amount of development on the edge of Leicester, Loughborough and Shepshed areas is likely to impact on the operation of the M1, specifically between M1 J21A and J24, and on the A46. It is considered important for the Council to ensure that there is sufficient infrastructure capacity to accommodate the proposed growth. This includes adequate capacity on the SRN to ensure the safe and efficient operation of the network and we would therefore expect that the impacts from development growth coming forward are appropriately assessed. The inclusion of Policy LP 34 - Local and Strategic Road Network is welcomed and further investigative work should be undertaken in order to better understand the potential impacts of the overall growth on the operation of the SRN and identify relevant mitigation requirements. The Local Plan should set out the need for large development sites to be supported by a Transport Assessment to understand likely traffic implications upon the operation of the SRN. 	
EDCLP/78 Queniborough Neighbourhood Plan Steering Group	Traffic was identified as the main concern by Queniborough villagers in the Neighbourhood Plan consultation. 81% of respondents to the Neighbourhood Plan Household Survey were concerned about traffic speeds; 71% with pedestrian safety; 66% with the number of heavy vehicles using the village despite the weight restrictions and 93% about traffic volumes (Neighbourhood Plan 3.7, 3.13 and 3.23). The new housing sites in Queniborough, East Goscote and Rearsby are all positioned just off the Melton Road and as such will generate significant additional traffic using Queniborough and Syston as the main route into Leicester. The Melton Road provides a shared footpath/cycleway which is also utilised as National Cycle Network (NCN) route 48. NCN48 provides cyclists with good connectivity to Syston, East Goscote	Concerns over traffic are noted. We are undertaking further transport modelling to understand what measures need to be put in place to help mitigate the impact of new developments. We are also undertaking an air quality study and will assess through this whether this is potential for an AQMA on Melton Road in Queniborough. We are undertaking a sustainable transport study which will look at how we can increase the number of journeys' being made by sustainable modes of transport, helping to reduce congestion and CO2 emissions. The Local Plan transport evidence will assess the impact of the whole development strategy however, individual site proposals will be supported by transport assessments and travel plans which will assess

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	and Rearsby. The additional traffic will have a significant impact when crossing this shared footpath and cycleway. This increase in traffic will increase the levels of air pollution that is associated with several health impacts. Therefore, QNPSG would like to see Charnwood Borough Council declare the Melton Road in Queniborough an Air Quality Management Area (AQMA) ensuring that it meets national air quality standards before any additional houses are built. Charnwood have already declared the Melton Road in Syston as an AQMA and QNPSG would like to also see how the new developments will also affect the road in Syston. In addition, QNPSG would like to see a current Base Traffic Survey, along the length of the Melton Road, undertaken before any further houses are built. QNPSG is also concerned about further proposed housing sites on the Barkby Road, Syston, HS8 and HS9, of 157 and 208 houses respectively. These will have severe consequences for the villages of Queniborough and Barkby in terms of increased volume of traffic passing through each village. It is inevitable that more vehicles will travel via Barkby Road in Queniborough and Queniborough Road in Barkby causing more congestion through both villages in order to get into Leicester (via Barkby) and onto the A607 (via Queniborough at The Crossroads). The Crossroads, in Queniborough, is already at capacity at morning and evening peak periods. The QNPSG would like to see another current Base Traffic Survey carried out, along Barkby Road, to establish the current use and capacity of the roads affected by the proposed developments.	the more localised traffic impacts.
	 Summary The Queniborough Neighbourhood Plan has already identified concerns about the impact of traffic and the new housing sites in Queniborough, East Goscote and Rearsby will all generate significant additional traffic using Queniborough and Syston as the main route into Leicester. Increased traffic will increase the levels of air pollution and so an Air Quality Management Area (AQMA) should be declared on Melton Road in Queniborough before any additional houses are built while the effects on the already declared AQMA on the Melton Road in Syston should be undertaken along the length of the Melton Road before any further houses are built and also 	

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	 along Barkby Road, to establish the current use and capacity of the roads affected by the proposed developments. Concern about further proposed housing sites on the Barkby Road, Syston, (HS8 and HS9), of 157 and 208 houses respectively. These will have severe consequences for the villages of Queniborough and Barkby by increasing traffic passing through each village. It is considered inevitable that more vehicles will travel via Barkby Road in Queniborough and Queniborough Road in Barkby causing more congestion through both villages in order to get into Leicester (via Barkby) and onto the A607 via Queniborough at The Crossroads which is already at capacity at morning and evening peak periods. 	
EDCLP/86 Rothley Parish Council	 Rothley depends heavily on the major A6 and A46 roads which are already under considerable pressure, which will increase substantially if the proposed Broadnook development goes ahead. The proposal to build an additional 151 houses in Rothley will increase this pressure still further. Summary Concern raised about existing pressure on the A6 and A46 roads which Rothley depends upon and the likelihood of increased pressure on these roads as a result of the Broadnook development. 	Highways England is charged with operating, maintaining and improving England's motorways and major A roads including the A46 and therefore are a key partner in assessing the impact of development proposals in the Local Plan. We will also work with Leicestershire County Council to fully and robustly assess all of the impacts of the development proposals should clarify the scale of the impacts and the mitigation measures that need to be put in place.
EDCLP/91 Queniborough Parish Council	Traffic was the number one concern raised in the Neighbourhood Plan consultation. 81% of respondents to the Neighbourhood Plan Household Survey were concerned about traffic speeds, 71% with pedestrian safety, 66% with the number of heavy vehicles using the village despite the weight restrictions, and 93% about traffic volumes (Neighbourhood Plan 3.7, 3.13, 3.23). The new sites on Melton Road, East Goscote and Rearsby, will generate a large amount of additional traffic using Queniborough as the route into Leicester.	Concerns over traffic are noted. We are undertaking further transport modelling to understand what measures need to be put in place to help mitigate the impact of new developments. We are also undertaking an air quality study and will assess through this whether this is potential for an AQMA on Melton Road in Queniborough. We are undertaking a sustainable transport study which will look at how we can increase the number of journeys' being made by sustainable modes of transport, helping to reduce congestion and CO2 emissions.
	HS8 and HS9 in Syston, will add to traffic using Queniborough as the route to the A46 and the M1. The Crossroads is already at capacity at morning and evening peak periods. The Council would wish to see a current base traffic survey carried out to establish the	The Local Plan transport evidence will assess the impact of the whole development strategy however, individual site proposals will be supported by transport assessments and travel plans which will assess the more localised traffic impacts.

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	current use and capacity of the roads affected by the proposed developments.	
	The amount of traffic has caused concerns about air pollution. Charnwood Borough Council has not declared an Air Quality Management Area in Queniborough but an AQMA has been declared for the Melton Road, as it is not likely to meet national air quality standards within the agreed deadlines. This is the very place that the proposed plan wishes to develop at HS10, HS71 and HS72. The Parish Council would wish to see a study on how the new developments will affect a road that already has an Air Quality Management Area designated on it.	
	 Summary Significant concern about traffic has been identified in the Queniborough Neighbourhood Plan and the new housing sites in Queniborough, East Goscote and Rearsby are all positioned just off the Melton Road, and as such will generate significant additional traffic using Queniborough and Syston as the main route into Leicester. Concern that further proposed housing sites on the Barkby Road, Syston, (HS8 and HS9) will lead to increased increased traffic through Queniborough. It is stated that The Crossroads is already at capacity at morning and evening peak periods. A current base traffic survey should be carried out to establish the current use and capacity of the roads affected by the proposed developments. There is particular concern about the effect of increased traffic levels on air pollution. The Parish Council would wish to see a study on how the new developments will affect the existing Air Quality Management Area as Sites HS10, HS71 and HS72 are all in the vicinity of Melton Road. 	
EDCLP/108 Sue Barry	Pot holes need repairing, lower speed limits. Summary	Leicestershire County Council has responsibility for maintaining the local road network and implementing speed limits.
	 Calls for the repair of pot holes and the imposition of lower speed limits. 	

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EDCLP/121 Marie Birkinshaw	 Suggest Council looks to improve plans for circularity of production and decreased waste and local consumption at all levels. Try to reduce car use and create less need to road building which has a bad record for biodiversity and soil run-off and pollutants. Summary Considered that the Borough Council should improve plans for circularity of production and decreased local consumption and waste at all levels. Car use should be reduced so that there will be less need for new road building which can affect biodiversity, soil run-off and pollutants. 	LP30 Sustainable Construction expects new developments and refurbishments to take account of sustainable development principles. We are preparing sustainable transport evidence which will assess how we can encourage more journeys to be made by sustainable modes of transport.
EDCLP/125 Tim Birkinshaw	 More emphasis on sustainable options (cycling and walking) and on the safety of vulnerable road users, is needed. Provision for electric vehicles is good. The proposed 'A46 Expressway' to the east of Leicester must be opposed as a destructive and thoroughly unsustainable proposal that will cause significant damage. Summary More emphasis on sustainable options of cycling and walking and on the safety of vulnerable road users. Supports the provision for electric vehicles. Opposes the proposed 'A46 Expressway' to the east of Leicester as a destructive and thoroughly unsustainable proposal that will cause significant damage. 	We are preparing sustainable transport evidence which will assess how we can encourage more journeys to be made by sustainable modes of transport. The A46 Expressway is being considered as part of the Strategic Growth Plan and its impacts will be considered as part of the evidence base being prepared to inform that Plan.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	Policy LP34 is fundamentally about promoting road based solutions with a nod in the direction of alternative sustainable modes of travel. It claims the Plan will reduce congestion and improve the efficiency of the road network. It also suggests that sustainable transport proposals would be considered before road improvements without suggesting how these would be evaluated or achieved. The supporting text talks of managing growth in a way that secures improvements without compromising the efficiency of the transport network. It is not evident what is meant by a "robust transport assessment" for road improvements or an "appropriate	Policy LP33 sets out how we intend to improve the sustainable transport offer in our Borough. We are also preparing sustainable transport evidence which will assess how we can encourage more journeys to be made by sustainable modes of transport. The study will also make recommendations on what types of sustainable transport schemes are suitable in specific locations across the Borough. New developments, where appropriate will be required to be supported by a transport assessment which will assess the impact of that development on the road network and make recommendations on

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	 transport assessment" for other network improvements. The Plan focuses very heavily on more road infrastructure as a way of catering for existing, committed and proposed development. The two Transport Assessment (TA) documents prepared by the County Council show that congestion on the road network is already extensive throughout the Borough and is generally worse in the areas where development is proposed. The TA Mitigation report proposes unspecified "mitigation works" to numerous junctions to improve their capacity by 20% (10% in Leicester City). There is no evidence to show how such works could be carried out or funded. Furthermore, the TA also shows that such works would not alleviate congestion even if implemented. The effect, as expected, seems to be to move congestion to another junction, and shuffle traffic around. The strategies for developing sustainable transport options need to be clearer and more pro-active. It is assumed that the reference in para. 9.3 to not compromising "the efficiency and effectiveness of our existing transport network" is largely a reference to the road network. The view that the emphasis is on the road network in preference to a sustainable transport network is reinforced in para. 9.7. In line with the SGP, the proposed A46 Corridor is seen as a key transport infrastructure corridor. CPRE Leicestershire is strongly opposed to the proposal for the A46 Expressway and the plan to make it a major development corridor. CPRE Leicestershire considers that actions to "reduce congestion and improve the efficiency of our local and strategic network" must be considered against the requirements for an integrated and sustainable transport strategy for Leicester and Leicestershire. We would want to see a specific reference to this in the introduction to this policy. This would give more weight to the first bullet point as it would set an overall context and approach in which sustainable transport not not at all. Summary Policy LP34 cons	mitigation measures. We are undertaking further transport modelling work to understand the impact of the development strategy on the road network and what mitigation measures are required to manage this impact.
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	 with a specific reference in the introduction to this policy giving more weight to the first bullet point as it would set an overall context and approach in which sustainable transport proposals could be considered. Policy claims that the Plan will reduce congestion and improve the efficiency of the road network. It also suggests that sustainable transport proposals would be considered before road improvements without suggesting how these would be evaluated or achieved. In the supporting text it is not evident what is meant by a "robust transport assessment" for road improvements or an "appropriate transport assessment" for other network improvements. The two Transport Assessment (TA) documents prepared by the County Council show that congestion on the road network is already extensive throughout the Borough and is generally worse in the areas where development is proposed. The TA Mitigation report proposes unspecified "mitigation works" to numerous junctions to improve their capacity by 20% (10% in Leicester City). There is no evidence to show how such works could be carried out or funded. Furthermore, the TA also shows that such works would not alleviate congestion even if implemented. The effect, as expected, seems to be to move congestion to another junction, and shuffle traffic around. The strategies for developing sustainable transport options need to be clearer and more pro-active. It is assumed that the reference in para. 9.3 to not compromising "the efficiency an effectiveness of our existing transport network" is largely a reference to the road network. In preference to a sustainable transport network in preference to a sustainable transport network in para 9.7. In line with the SGP, the proposed A46 Corridor is seen as a key transport infrastructure corridor. CPRE Leicestershire is strongly opposed to the proposal for the A46 Expressway and the plan to make it a major development corridor. 	
EDCLP/147 Hoton Parish Council	This policy does not address reducing the currently unacceptable level of congestion in Loughborough. Summary	We are undertaking further transport modelling work to understand the impact of the development strategy on the road network and what mitigation measures are required to manage this impact.

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	This policy does not address reducing the currently unacceptable level of congestion in Loughborough.	
EDCLP/163 Liz Hawkes Anstey Parish Council	Anstey PC continues to have concerns about the increasing levels of traffic which affect Anstey village. We would expect Charnwood BC to support the parish in helping to minimise the traffic impact on Anstey from new developments, especially with regard to improving on and off street car parking. The Parish Council suggests that an 'Anstey Bypass' should be delivered within the next 10 years. If further development is to be increased to the West of Anstey, access and egress onto the A50 should be seriously investigated.	We are undertaking further transport modelling work to understand the impact of the development strategy on the road network and what mitigation measures are required to manage this impact. We will consider through the transport modelling whether an Anstey Bypass is a suitable mitigation measure.
	Summary	
	 Concerns about the increasing levels of traffic which affect Anstey village. We would expect Charnwood BC to support the parish in helping to minimise the traffic impact on Anstey from new developments, especially with regard to improving on and off street car parking and the delivery of an Anstey Bypass within the next 10 years. If further development is to be increased to the west of Anstey, access and egress onto the A50 should be seriously investigated. 	
EDCLP/226 Eleanor Hood	Consider assessing the current situation along the single carriage way section of the Epinal Way. There appears to be sufficient space to allow for a dual carriage way. Although it would reduce some green areas it would reduce the severe congestion in this area.	We are undertaking further transport modelling work to understand the impact of the development strategy on the road network and what mitigation measures are required to manage this impact. We will consider through this work whether there is potential to dual the single carriage way section of Epinal Way.
	Summary	
	• Consider improvements to the single carriage way section of the Epinal Way as there appears to be sufficient space to allow for a dual carriage way. Although it would reduce some green areas it would reduce the severe congestion in this area.	
EDCLP/230 Barbara Fisher	" nearly 64% of people who live in Charnwood make their journey to work by car" Improving bus routes, bus services is not mentioned. If it isn't mentioned, it won't get looked at when the Plan	We are undertaking sustainable transport evidence which will look at how we can increase the number of journeys being made by sustainable modes of transport including bus travel.

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	is being constructed.	
	Summary	
	Calls for more priority for improving bus routes and bus services.	
EDCLP/228 Haddon Way Residents Association	We believe that that the local and strategic Road Network should be looked at first. We believe that the CBC should prioritise where infrastructure should go first, before housing, as we believe housing is determining where infrastructure should be retrospectively deployed. How can we plan in a suitable road network that are suitable for buses to get these new residents to schools, medical practices and other services that they may need? Surely the council should be planning for where main roads, hospitals/medical centres and schools should go first, with the road network planned in to serve these areas appropriately.	The site selection process has been informed by a sustainability appraisal. We are also undertaking further pieces of evidence to support the development strategy including sustainable transport, transport modelling, infrastructure delivery and viability. The exact location of new infrastructure will be further assessed through the masterplanning and DM processes. Concerns over access to Site HS35 are noted and will be considered through the DM and masterplanning processes.
	If these were planned in first the roads would be appropriate for further development in the future, which wouldn't need remedial work.	
	On our estate Highland Drive had originally been designed to accommodate a bus route, unfortunately that currently isn't on the horizon. Instead the estate's cars sit on these roads, and concern is often raised by residents as to how a bus would actually get around the estate.	
	The estate has been designed so that traffic should travel at 20mph, this involves table junctions and many bends. With insufficient parking provision, and no bus route, many vehicles end up on the highway.	
	It is hard to see how further piecemeal development of Loughborough can improve this situation. With "little" parcels of land being identified across the south of Loughborough how can the network adequately cope?	
	HS35 is split into 2 parcels of land. It is not clear how the housing split will be between these two parcels of land. One which sits near 1096	

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CONSULTEE	the Epinal Way Extension, and the other in a seemingly inaccessible field the other side of linear park, with access only through Woodthorpe village that has been around since the days of the doomsday book. The only access to this field is via a single track. This development would have only one entrance point, from roads that are inadequate it would also be cut off from the existing development as a green linear park runs down the existing grange park estate. Roads can be given remedial work, but the plan shows that these two areas sit in a site allocated for "sustainable urban extension site". The existing road network for these sites is already inadequate for an extra proposed 344 dwellings! Summary	OFFICER RESPONSE
	 Considers that development should be infrastructure led rather than vice versa. The council should be planning for where main roads, hospitals/medical centres and schools should go first, with the road network planned in to serve these areas appropriately. Concerns about the design of the Highland Drive Estate which has led to high levels of on street parking and potential difficulties for bus movements. It is hard to see how further piecemeal development of Loughborough can improve this situation. With "little" parcels of land being identified across the south of Loughborough how can the network adequately cope? Concerns about the accessibility and developability of Site HS35 because of its sub division. One part is situated near the Epinal Way Extension, and the other in a seemingly inaccessible field the other side of linear park, with access only through Woodthorpe village via a single track. This development would have only one entrance point, from roads that are inadequate for an extra proposed 344 dwellings. 	
EDCLP/203 Leicestershire and Rutland Bridleways	Q39 LP34 Support the Policy but feel that the measures needed to increase non-motorised travel need to be much bolder. The text virtually admits that the envisaged efforts will only bring about a small percentage change. On Charnwood's generally narrow and	We are undertaking sustainable transport evidence which will look at how we can increase the number of journeys being made by sustainable modes of transport. We look through this study how the sustainable transport network can be made more accessible for vulnerable road

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Association	rarely quiet roads, an Alternative Network is needed for VRU's before they will fully adopt Sustainable Travel in sufficient numbers to make the required difference.	users.
	Summary	
	 Supports Policy LP34 but feels that the measures needed to increase non-motorised travel need to be much bolder as the supporting text acknowledges that the measures would only bring about a small percentage change. An alternative network is needed for VRU's before they will fully adopt sustainable travel in sufficient numbers to make the required difference. 	
EDCLP/158 Mrs J Brettle- West	 Rothley depends heavily on the major A6 and A46 roads which are already under considerable pressure, which will increase substantially if the proposed Broadnook development goes ahead. The proposal to build an additional 151 houses in Rothley will increase this pressure still further. Summary Concern raised about existing pressure on the A6 and A46 roads which Rothley depends upon and the likelihood of increased pressure on these roads as a result of the Broadnook development. 	Highways England is charged with operating, maintaining and improving England's motorways and major A roads including the A46 and are a key partner in assessing the impact of development proposals. We will also work with Leicestershire County Council to fully and robustly assess all of the impacts of the development proposals should clarify the scale of the impacts and the mitigation measures that need to be put in place
EDCLP/153 East Goscote Parish Council	We commend the Plan's expressed desire to support sustainable transport; but policies relating to this aim are weak. Policy 33, Sustainable Transport, makes reference to walking, cycling and public transport infrastructure as an integral part of new developments, which is welcome. As a Borough Council, Charnwood's influence over public transport is limited, so it cannot be expected to have strong policies in that respect. However, the Plan does not make a firm commitment to provide a network of protected cycle and pedestrian infrastructure through and between existing urban areas – perhaps the key determinant of sustainable transport modal share . Policy 34, Road Network, though it requires "that sustainable transport proposals are considered first before any improvements	We are undertaking further transport modelling work to understand the impact of the development strategy and also to assess the mitigation measures required to manage the impact of traffic. Individual site proposals, where required, will also be supported by transport assessments and travel plans. We are also undertaking sustainable transport evidence which will look at how we can improve sustainable travel in the Borough.

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	to the local and strategic road network" implies, within that statement, that "improvements" mean enhancements to the carrying capacity of roads for motorised vehicles. In this context, the other requirements within the policy indicate that this will be a major element of transport management: the Council will require "road improvements" and "other network improvements as identified by appropriate transport assessments."	
	Increasing capacity is an extremely inefficient way of dealing with congestion. Typically, traffic volumes within a highway network increase by 20% in the immediate aftermath of a new piece of highway infrastructure being provided. In subsequent years, they may increase by anything up to 178%, so that typically, congestion levels return to their earlier position.	
	We do not contend that road improvements are never appropriate as a means of dealing with the traffic consequent upon new development. However, we argue that the Council should consider traffic to be a consequence of policy, rather than an input to it. Rather than predicting the amount of car journeys that a development may generate, and then adapting the road network to accommodate it, the Council should facilitate and support modal shift via site location and design, and by the construction of sustainable transport facilities, including protected cycle routes, throughout the Borough.	
	Summary	
	 Commend the Plan's expressed desire to support sustainable transport but policies relating to this aim are weak. Policy 34 requires "that sustainable transport proposals are considered first before any improvements to the local and strategic road network" but within that statement, "improvements" mean enhancements to the carrying capacity of roads for motorised vehicles. In this context, the other requirements within the policy indicate that this will be a major element of transport management: the Council will require "road improvements" and "other network improvements as identified by appropriate transport assessments." Considers that road improvements are not an appropriate way 	

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	 of dealing with traffic consequent for new development because traffic volumes within a highway network increase by 20% in the immediate aftermath of a new piece of highway infrastructure being provided and in subsequent years may increase by anything up to 178%, so that typically, congestion levels return to their earlier position. Argues that the Council should consider traffic to be a consequence of policy, rather than an input to it. Rather than predicting the amount of car journeys that a development may generate, and then adapting the road network to accommodate it, the Council should facilitate and support modal shift via site location and design, and by the construction of sustainable transport facilities, including protected cycle routes, throughout the Borough. 	
DCLP-425-470 Environment Agency	The Environment Agency welcomes policy DP LP 34. If not constructed and managed correctly throughout their lifetime roads and road traffic do have the potential to have an adverse effect on the water environment. For example any run-off from the road network should be managed in such a way that it does not pose a pollution risk to surface or ground waters. Your Authority should consider inclusion of this issue within the Policy wording. Summary	Comment is noted. We will consider and review whether there is potential to amend the policy wording as requested.
	 The Environment Agency welcomes policy LP 34 but calls for consideration within the policy wording of managing run-off from the road network in such a way that it does not pose a pollution risk to surface or ground waters. 	
EDCLP/256 John Weston	Traffic is also a major problem in the area which will only get worse with more housing. I believe there is a report which shows the air quality along Melton Road Queniborough/Syston is of such poor quality that it falls below the government requirement.	We are undertaking further transport modelling to understand the impact of new development and what mitigation measures are required. We are also undertaking air quality evidence and through this we can consider the need for an AQMA along Melton Road, Queniborough.
	Summary	
	 Concerns about new development increasing traffic and impacting on air quality. 	
EDCLP/211 Cllr	Q iii) I do not know of any route from Town area that can get onto	Paragraph 9.6 refers to the proximity of the M1 and does not specify the

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Margaret Smidowicz	the M1 in 5 minutes at any time of the day now. At peak times I would allow for at least 20 minutes if accessing from Forest Road and if using Epinal Way equally that time. Could this be timed by an officer at 8.30 am to 6 pm and 4.30-6 pm please.	journey time. We are undertaking further transport modelling work which will look at journey times and congestion.
	Summary	
	 Considers that at peak times it takes at least 20 minutes to drive from Loughborough town to the M1 if accessing from Forest Road and if using Epinal Way. Called for a survey of travel times for this journey at 8.30 am to 6 pm and 4.30-6 pm. 	
EDCLP/193 Richard Webb	 There is always a requirement to look at transport effects but it is always judged against current structure. The planning meetings for large developments rarely take into account the forecasted increase from other developments either in progress or planned. The policy should take into account that existing and planned developments are to have a bearing and what that bearing is. Summary Need to take into account the forecasted transport effects from existing and planned developments. 	We are undertaking further transport modelling which will assess the cumulative impact of the development strategy included existing development and planned proposals.
EDCLP/252 Leicestershire County Council	 Reference to rail needs to be included in the Draft Local Plan, particularly given the importance of Loughborough Railway Station and the key supporting role to the quarrying industry within the borough. [Cabinet Report]. General Comment: The lack of any reference to rail within this chapter is surprising given the importance of Loughborough Railway Station and the key supporting role to the quarrying industry within the borough. Summary 	Rail is mentioned in the supporting text to LP33. We will review whether reference should be made to rail in LP33 sustainable travel.

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	• Reference to rail needs to be included in the Draft Local Plan, particularly given the importance of Loughborough Railway Station and the key supporting role to the quarrying industry within the borough.	
DCLP 266 Leicester City Council	As part of the evidence base, strategic transport modelling has been undertaken using LLITM for seven different development options based on a high growth and low growth scenarios. There have been areas of the City for each of the low growth development options, where there has been mitigation applied (outside of the City), network performance has not returned to the Core network performance. Now that a preferred development strategy has been identified, based on a 'hybrid' of a low growth scenario, the City Council Highway Authority will continue to work with Charnwood Borough Council to further explore the highway impacts of this preferred development option. If there are any adverse impacts identified on the City's highway network, this may be subject to mitigation measures required to support this new growth. For example: - Contribution towards improvements to strengthen and enhance existing public transport links and infrastructure (including park and ride service and rail services) that will provide sustainable services and to reduce the reliance on car journeys - Contribution towards SMART technological and data led improvements and highway infrastructure improvements along Leicester's radial corridors. These areas may include A6 (Abbey Lane), A607 Melton Road, Anstey Lane, A50 Groby Road and the A46.	We will continue to liaise with the City and County Council's as the transport modelling work progresses and will review any mitigation measures that may be required in the City with the City Council and other key stakeholders.
	 Summary The City Council Highway Authority will continue to work with Charnwood Borough Council to further explore the highway impacts of this preferred development option. If there are any adverse impacts identified on the City's highway network, this may be subject to mitigation measures required to support this new growth which could include a contribution towards improvements to strengthen and enhance existing public transport links and infrastructure, a contribution towards SMART technological and data led improvements and highway infrastructure improvements along Leicester's radial corridors. These areas may include A6 (Abbey Lane), A607 Melton Road, 	

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	Anstey Lane, A50 Groby Road and the A46.	
EDCLP/252 Leicestershire County Council	 Q: Do you have any comments on draft policy LP34 (Local and Strategic Road Network)? Noting the potential interactions of growth proposed through the draft Local Plan with neighbouring Districts (including Leicester City, Blaby and North West Leicestershire) and the potential resulting cumulative impacts within and without the Borough, it would be helpful if some supporting text could be added to policy LP34 to reflect this and provide a basis for cross-boundary contributions and mitigation (it may be considered more appropriate to embed this in the policy to ensure it has a sufficiently robust basis). 	Comments on contributions to cross-boundary mitigation measures are noted. We will continue to liaise with stakeholders on cross boundary issues through the transport modelling and on-going discussions. We will review whether specific reference should be made to this in the supporting text. Comment on third bullet point noted, this will be amended to 'ensuring that any <u>development</u> is supported by'.
	The third bullet point of the proposed policy refers to "ensuring that any road improvements are supported by a robust transport assessment" – should the underlined portion actually be "development"?	
	Summary	
	 Some supporting text could be added to policy LP34 to reflect the potential interactions of growth proposed through the draft Local Plan with neighbouring Districts (including Leicester City, Blaby and North West Leicestershire) and the potential resulting cumulative impacts within and without the Borough. This could provide a basis for cross-boundary contributions and mitigation. In the third bullet point the words <i>road improvements</i> in "ensuring that any road improvements are supported by a robust transport assessment" should be replaced by "development"? 	
EDCLP/252 Leicestershire County Council	"We will reduce congestion" Not sure that wording is in line with the NPPF. Summary	Comment is noted. We will review wording and consider whether it is in accordance with the NPPF.
	Questions whether the wording "We will reduce congestion " is in	

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	line with the NPPF.	
Q40 - LP35 - Car F	Parking Standards	
Do you have any o	comments on this draft policy?	
	with the proposed policy please set out why and what alternative	approach would you suggest?
Do you think we h	nave missed something?	
DCLP/48 and DCLP/62	Car parking is an issue in the villages and people won't come to the villages if they can't park. Suggest you use neighbourhood plans	Draft Policy LP35 is primarily aimed at new development. On this basis, new developments in villages should provide the necessary amount of
Ms Suzanne	for suggested solutions.	car parking as required by LCC and by Draft Policy LP35.
Collington		
	Summary	Additional car parking in villages could be facilitated through the Neighbourhood Plan process.
	 Lack of car parking is an issue in the villages. 	
	• Neighbourhood plans can be used for suggested solutions.	
DCLP/93	The promotion of sustainable transport is fully supported (see also	Draft Policy LP35 is primarily aimed at new development. On this basis,
Mr Dennis	Q 41). The proposed policy is agreed with. In Quorn the demand	new developments in villages should provide the necessary amount of
Marchant	for car parking is already exceeding demand and as a service	car parking as required by LCC and by Draft Policy LP35.
	centre supporting the local area as both a medical, shopping and a	
	recreational centre it is essential that the issue of car parking is	Additional car parking in Service Centres could be facilitated through the
	addressed with some urgency. The Borough Council commissioned	Neighbourhood Plan process.
	a Car Parking impact assessment in 2015 and a Site Availability	
	and Deliverability Assessment in 2017.	
	The Study was undertaken by consultants White Young Green on	
	behalf of the Borough Council. It looked at the opportunities for	
	bringing forward new sites for car parking in Quorn (amongst	
	others) which were all locations where White Young Green had	
	identified a need for new car parking in their 2015 Car Parking	
	Impact Assessment. It is felt that the borough council should get	
	on and implement the recommendations for Quorn where they	
	already own land as soon as possible.	
	Summary	
	The promotion of sustainable transport is fully supported and	
	the proposed policy is agreed with.	
	 In Quorn the demand for car parking is already exceeding 	
	supply and it is essential that the issue of car parking is addressed with some urgency to ensure the role of the village	
	as a service centre is maintained.	
	The Borough Council should implement the recommendations (2015) and the	
	for Quorn in the Car Parking Impact Assessment (2015) and the	
	Site Availability and Deliverability Assessment (2017).	
DCLP/181	It is recognised that sufficient parking provision is essential in	Noted – Draft Policy LP 33 aims to promote and improve sustainable

Mr Joseph Hall	enabling people to go about their everyday lives. In considering	transport across the borough.
	 parking provision, it is essential – if we wish to maximise sustainable travel; environmental benefits; promote health and physical activity; and reduce congestion – that increases in parking provision are considered only alongside/following opportunities to promote and increase sustainable travel options are exhausted. Summary Don't understand the point as it seems contradictory. 	
DCLP/190 Quorndon Parish Council	 Agreed - however, QPC is aware that in Quorn the demand for off road car parking already exceeds supply and as a service centre supporting the residents and surrounding communities it is essential that the issue of the lack of car parking is given priority. A Car Parking Impact Assessment (2015) and a Site Availability and Deliverability Assessment (2017) were commissioned by the Borough and these looked at the opportunities for bringing forward new sites for car parking in Quorn (amongst others) and identified sites near the village centre. The QNP supports proposals to develop a new car park at a suitable location in the village centre and QPC believes that the Borough should implement the report's recommendations for Quorn as soon as possible. Summary Agree with the policy but in Quorn the demand for off road car parking already exceeds supply and as a service centre supporting the residents and surrounding communities it is essential that the issue of the lack of car parking is given priority. The Parish Council supports proposals to develop a new car park at a suitable location in the village centre as soon as possible in accordance with the recommendations of the Car Parking Impact Assessment (2015) and the Site Availability and Deliverability Assessment (2017). 	Draft Policy LP35 is primarily aimed at new development. On this basis, new developments in villages should provide the necessary amount of car parking as required by LCC and by Draft Policy LP35. Additional car parking in Service Centres could be facilitated through the Neighbourhood Plan process.
DCLP/194 Miss Shirley Dixon	The villages such as Rothley and Quorn are not able to take any more vehicles and parking is a nightmare Do you think we have missed something? Listening to residents Summary	Draft Policy LP35 is primarily aimed at new development. On this basis, new developments in villages should provide the necessary amount of car parking as required by LCC and by Draft Policy LP35. Additional car parking in Service Centres could be facilitated through the Neighbourhood Plan process.

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	Concern about the number of vehicles and parking availability in villages such as Rothley and Quorn.	
DCLP/235 Mr Gideon Cumming	 Summary Minimum carparking requirements rather than maximum requirements are proposed and that developments that do not meet the minimum requirements are rejected. Include a requirement that any proposed new development includes parking and traffic assessments, particularly within Loughborough town centre. 	Striking the appropriate balance between delivering new and additional car parking, whist also promoting sustainable transport is one of the Council's priorities. The policy framework in the draft local plan strikes the right balance, with new development expected to provide an appropriate and commensurate level of car parking, whilst Draft Policy LP33 promote sustainable transport across the borough.
DCLP/242 Mr. John Catt	 The parking of cycles appears to have been ignored. If we are looking to increase cycling levels then good secure (and ideally covered) cycle parking provision is important. Also no consideration appears to have been given to a probable move to robot cars, summoned by smart phone, which could have a dramatic effect of the need for car parking. Summary The parking of cycles appears to have been ignored. If we are looking to increase cycling levels then good secure (and ideally covered) cycle parking provision is important. No consideration appears to have been given to a probable move to robot cars, summoned by smart phone, which could have a dramatic effect of the need for car parking provision is important. 	Draft Policy LP35 is primarily aimed at new development and car parking. However, it is noted that the provision of other transport infrastructure is important to delivering sustainable development. This response will be used to inform the drafting of Draft Policy LP33 and Draft Policy LP35.
LDCLP/02 Anonymous	 Shepshed needs more of this Make sure the Science park has park Do you think we have missed something? More bus routes and parking Summary Considers that Shepshed needs more car parking and that the new Science and Enterprise Park is provided with adequate car parking along with more bus routes. 	Draft Policy LP35 is primarily aimed at new development. On this basis, new developments in villages should provide the necessary amount of car parking as required by LCC and by Draft Policy LP35. Additional car parking in Urban Areas / Settlements could be facilitated through the Neighbourhood Plan process.
LDCLP/51 Anonymous	Less use of cars is needed long term Encourage more localism with less use of cars. Summary • Less car use is needed.	Noted – Draft Policy LP33 supports the delivery of sustainable transport across the borough.

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EDCLP/34 Cllr Mary Draycott	A policy of areas not to be concreted over needs introducing, gravel an alternative allowing water to soak in to the earth. See comments on flooding. New houses with drives and gardens should have conditions to allow rain water to drain safely. Summary • Comments do not relate to car parking standards	Noted – the draft local plan aims to deliver sustainable development, protecting and enhancing valued natural assets, whilst meeting the needs and demands of residents and businesses.
EDCLP/95 Barrow Upon Soar Parish Council	 The Leicestershire Highway Design Guide is not a suitable starting point for the application of Car Parking Standards. Section DG14 (Part 3) of the Highway Design Guide sets out off-street parking standards. These standards (other than residential) are taken from RPG8 which has been revoked. Furthermore, they are expressed as maximum vehicular parking standards contrary to NPPF paragraph 106 which states that 'maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification'. The Barrow upon Soar Neighbourhood Plan concluded that car parking standards expressed as a maximum requirement could exacerbate existing and future parking problems in the Village Centre. Therefore, our Neighbourhood Plan has set minimum parking requirements. The Draft Charnwood Local Plan 2019-36 should take steps to ensure that Draft Policy LP 35 is aligned or refer to Neighbourhood Plan Policy BuS8. Summary Considers that the Leicestershire Highway Design Guide is not a suitable starting point for the application of Car Parking Standards which (other than residential) are taken from RPG8 which has been revoked. The Highway Design Guide standards are expressed as maximum vehicular parking standards contrary to NPPF paragraph 106 which states that 'maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification'. The Barrow upon Soar Neighbourhood Plan concluded that car 	Noted – LCC as Highway Authority has provided guidance, which the Council believes the local plan should have regard. Draft Policy LP35 provides flexibility to consider other issues where they arise. Additional car parking in Service Centres could be facilitated through the Neighbourhood Plan process.
	 The Barrow upon Soar Neighbourhood Plan concluded that car parking standards expressed as a maximum requirement could exacerbate existing and future parking problems in the Village 	

RESPONSE NO/ CONSULTEE	REPRESENTATION SUMMARY	OFFICER RESPONSE
	Centre. Therefore, the Barrow Neighbourhood Plan has set minimum parking requirements. The Draft Charnwood Local Plan should take steps to ensure that Draft Policy LP 35 is aligned or refer to Neighbourhood Plan Policy BuS8.	
EDCLP/108 Sue Barry	More free parking Summary • More free car parking called for.	Draft Policy LP35 is primarily aimed at new development. On this basis, new developments in villages should provide the necessary amount of car parking as required by LCC and by Draft Policy LP35. Additional car parking in Service Centres could be facilitated through the Neighbourhood Plan process.
EDCLP/121 Marie Birkinshaw	Very important to lessen the public image and appeal of individual car use and multi-car ownership and to lessen the need for urban car parking. Summary	Draft Policy LP35 is primarily aimed at new development. On this basis, new developments in villages should provide the necessary amount of car parking as required by LCC and by Draft Policy LP35. Draft Policy LP33 aims to promote more sustainable travel patterns
	 Considers that it is very important to lessen the public image and appeal of individual car use and multi-car ownership and to lessen the need for urban car parking. 	across the borough.
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	The policy shows little or no regard for transport objectives to promote sustainable transport. There is no evidence to show the Council has seriously considered or evaluated sustainable transport when considering the need for additional car parking. There is a need in the commentary for an explanation on how car parking standards accord with wider transport objectives promoting sustainable transport modes. Would these standards involve developments which were car free and if so, how does this relate to Policy LP33 on sustainable travel?	Draft Policy LP33 aims to promote more sustainable travel patterns across the borough.
	 Summary The policy shows little or no regard for transport objectives to promote sustainable transport and there is no evidence to show that the Council has seriously considered or evaluated sustainable transport when considering the need for additional car parking. There is a need in the commentary for an explanation on how car parking standards accord with wider transport objectives promoting sustainable transport modes. 	
EDCLP/147	Consideration should be given to increasing the car parking	The car parking standards are defined by Leicestershire County Council

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Hoton Parish Council	 standards for dwellings in village locations, particularly those with poor access to public transport. Summary Calls for the raising of car parking standards for dwellings in villages, particularly where there is poor access to public transport. 	as the Highways Authority. Draft Policy LP35 seeks to allow flexibility in the delivery of car parking spaces where there is robust evidence to demonstrate there would not be detrimental impacts.
EDCLP/164 Dr S.J.Bullman Storer & Ashby Area Residents Group (SARG)	 We will ensure that all new developments which generate a demand for car parking make provision appropriate to the scale and nature of the development." You say this, but continue to pass residential developments without sufficient car parking places and pretend that imposing a "no car agreement" on the permission is a valid alternative. However, when tested, you consistently have no effective means to enforce the agreement, whether by political will, officer resourcing or legal standing and the public find you are unable to take any effective action when the agreements are broken. Pursuing the use of "no car agreements" increases the profitability of the proposals, and thereby increases the likelihood of more such being made, when you know full well you are unable to enforce them. This brings the planning process into disrepute and should be stopped forthwith. Summary Calls for stronger policy guidance to ensure appropriate levels of car parking for development with consideration given to policy implementation in development management decisions. 	The car parking standards are defined by Leicestershire County Council as the Highways Authority. Draft Policy LP35 seeks to allow flexibility in the delivery of car parking spaces where there is robust evidence to demonstrate there would not be detrimental impacts.
EDCLP/165 Dr S.J.Bullman	We will ensure that all new developments which generate a demand for car parking make provision appropriate to the scale and nature of the development." You say this, but continue to pass residential developments without sufficient car parking places and pretend that imposing a "no car agreement" on the permission is a valid alternative. However, when tested, you consistently have no effective means to enforce the agreement, whether by political will, officer resourcing or legal standing and the public find you are unable to take any effective action when the agreements are broken Pursuing the use of "no car agreements" increases the profitability of the proposals, and thereby increases the likelihood of more such being made, when you know full well you are unable to enforce	The car parking standards are defined by Leicestershire County Council as the Highways Authority. Draft Policy LP35 seeks to allow flexibility in the delivery of car parking spaces where there is robust evidence to demonstrate there would not be detrimental impacts.

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	them. This brings the planning process into disrepute and should be stopped forthwith.	
	• Calls for stronger policy guidance to ensure appropriate levels of car parking for development with consideration given to policy implementation in development management decisions.	
EDCLP/216 Tom Collins Ninteen47 obo Davidsons & Redrow	Car parking standards must take account of site-specific circumstances, including the nature of the proposed development, site accessibility and other design objectives. Whilst the Leicestershire Highway Design Guide provides a starting point for the consideration of parking, it would be inappropriate for a Development Plan policy to have the effect of giving it statutory weight.	The car parking standards are defined by Leicestershire County Council as the Highways Authority. Draft Policy LP35 seeks to allow flexibility in the delivery of car parking spaces where there is robust evidence to demonstrate there would not be detrimental impacts.
	 Summary Considers that car parking standards must take account of site- specific circumstances, including the nature of the proposed development, site accessibility and other design objectives. 	
EDCLP/226 Eleanor Hood	The policy should aim to reduce use of cars and increase walking, cycling and use of buses. Why not increase cycle parking? Why no mention of identifying a site for a bus station near to the centre of town?	Draft Policy LP33 aims to promote more sustainable travel patterns across the borough.
	 Summary The policy should aim to reduce use of cars and increase walking, cycling and use of buses including identifying a site for a bus station in Loughborough. 	
EDCLP/228 Haddon Way Residents Association	We would like to see a standard of houses over 3 bedrooms to have 3 car spaces with 2 operating independently of each other, as we see many cars on our estate not able to use their space allocation to their house due to work timings. This leads to many cars on the highway causing obstructions.	The car parking standards are defined by Leicestershire County Council as the Highways Authority. Draft Policy LP35 seeks to allow flexibility in the delivery of car parking spaces where there is robust evidence to demonstrate there would not be detrimental impacts.
	 Summary Calls for a car parking standard of houses over 3 bedrooms to have 3 car spaces with 2 operating independently of each other. 	

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EDCLP/159 C.Mulvaney	 40 (a) What evidence is there that we are short of car parking? Do you mean for residents in certain areas, for businesses or for shops? 40 (c) Draft Policy LP 35 Car Parking Standards We will ensure that all new developments which generate a demand for car parking make provision appropriate to the scale and nature of the development. Proposals for the provision of residential and non-residential parking should:ensure that new parking infrastructure is well designed and in suitable, sustainable locations; Any new car parking infrastructure inevitably means hardstanding, and probably means reducing the amount of grassed/planted areas and thus any new parking must be designed to mitigate the effects of hardstanding and provide areas of green planting, including trees. This shows a joined up Local Plan that also meets the need to plant trees. Summary Considers that the plan does not demonstrate evidence for a lack of car parking while new car parking must be designed to mitigate the effects of hardstanding and provide areas of green planting. 	Noted – the need to ensure that car parking infrastructure is designed in such a manner as to promote better drainage etc is supported. This representation will be used to inform the next draft of the local plan, and the next draft of the policy.
EDCLP/177 Sue Green House Builders Federation	Draft Policy LP35 - Car Parking Standards proposes that provision of residential parking should reflect the guidance set out in the Leicestershire Highway Design Guide unless it is supported by robust evidence that illustrates that the development would not have a detrimental impact on highway safety, parking in neighbouring areas and local amenity. The reference to the Leicestershire Highway Design Guide in Draft Policy LP35 should not be interpreted by the Council's Development Management Officers as conveying the weight of a Development Plan Document onto a Design Guide. This Design Guide has not been subject to examination and does not form part of the Local Plan. This reference should be removed from Draft Policy LP35. If it is inserted into supporting text, the Council should only be stating that development proposals should have regard to the Highway Authority's standards and guidance.	Noted – LCC as Highway Authority has provided guidance, which the Council believes the local plan should have regard to. Draft Policy LP35 provides flexibility to consider other issues where they arise.

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	 Summary The reference to the Leicestershire Highway Design Guide in Draft Policy LP35 should be deleted as it does not have the weight of a Development Plan Document. If it is inserted into supporting text, the Council should only be stating that development proposals should have regard to the Highway Authority's standards and guidance. 	
EDCLP/252 Leicestershire County Council	"Leicestershire County Council, as the local Highway Authority, has prepared a Leicestershire Highway Design Guide which provides advice on highway design, including parking standards. It makes recommendations on the levels of car, cycle, motorcycle, electric car charging and disabled parking that should be provided."	Noted – the reference to the Design Guide is included in the policy wording.
	Summary Reference is made to the Leicestershire Highways Design Guide which provides advice on highway design, including parking standards including levels of car, cycle, motorcycle, electric car charging and disabled parking that should be provided.	
EDCLP/277 RPS obo Bellway Homes	Due to changing patterns of behaviour in respect of car ownership, it would be worthwhile the Council producing its own SPD on residential parking, rather than relying on Leicestershire County Council's Highway Design Guide (last updated in April 2018), under section DG14, para 3.173 where the onus is on the outdated research DCLG paper method (2014), for developments over 5 units. These document(s) have not been consulted upon, and needs to be brought up to date if the Council intend using them effectively.	Noted – LCC as Highway Authority has provided guidance, which the Council believes the local plan should have regard to. Draft Policy LP35 provides flexibility to consider other issues where they arise.
	<i>I the Council and its partners do to ensure that there are robust p lopment in Charnwood?</i>	lans in place for providing the infrastructure that is necessary to
DCLP/8 Mr Corey Taylor	Considers that development of Site HS67 would require multi million pound investment in infrastructure to make sustainable.	Large-scale development sites usually require a greater provision of infrastructure. A proportional response to the scale of the development is commonplace.
		All development sites are required to mitigate their impacts on infrastructure and services. The draft local plan sets out a policy framework to make sure that developments mitigate their impacts, and deliver sustainable development.
DCLP/48	Asks for more notice to be taken of the views of villagers and use	The preparation of the Local Plan is informed by periods of formal and

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Ms Suzanne Collington	made of neighbourhood plans to inform policy	informal consultation. The Borough Council works closely with Parish Councils in the preparation of Neighbourhood Plans.
DCLP/74 Mrs Elizabeth Warren	Calls for an embargo on future housing development until existing sewerage problems in the area can be addressed. In the last month I have discovered that at least 1,000 houses SEWAGE passes under my garden manhole. Now because of heavy rain. We have had sewage spilling into my vegetable garden and all over the slabs outside my back door. Severn Trent have coped but volume flowing through a six inch pipe will block regularly. Since July my toilet has backed up when flushed, the water looks clean but leaves a stain on the porcelain PLEASE DO NOT PLAN FURTHER houses in my area without new sewage piping. I dread Ashton Green being added to the Barkby-Syston flow through mine and my next door neighbours gardens it will block again and leak. The storm drain connects with the sewage when it rains. Its wonderful. Both manholes in my garden have sewage in them what a system. University Close has had a foot of water in the centre cutting off several elderly people (80's) up the end of the culdesac. Severn Trent cleared the drain into the Syston Brook but the level 6 months of the year is above the outlet. PLEASE DO NOT BUILD FURTHER HOMES WITHOUT NEW SEWAGE PIPES.	We regret that you are experiencing sewerage problems. With respect to plan preparation we take water and sewerage issues seriously. We have commissioned further flood risk assessment work in addition to the flood risk assessment undertaken in 2018. We are consulting with Severn Trent Water about future development sites which we are allocating in the plan. Sites which come forward through planning applications will also be widely consulted on.
DCLP/92 Mr Dennis Marchant	Strongly supports the adequate provision of schools and health centres and local funding for such facilities. Encourages the Borough Council's adoption of CIL because it can be targeted to local areas through the allocation of 25% to the parish in which development took place.	It is essential that adequate education and health services are provided for new development and we are working closely with Leicestershire County Council and the Clinical Commissioning Groups so that we understand how needs will be addressed. We note your comments about the Community Infrastructure Levy.
DCLP/127 Mr Stuart Love	The draft Sustainability Appraisal notes that the population in Cossington is reliant on healthcare facilities outside of the village in Sileby and Syston but that the scale of growth in Cossington is unlikely to generate notable pressure on these facilities. However the impact on health care facility demand and availability from proposed development of housing in both Sileby and Syston needs to be taken into account	The Sustainability Appraisal informs the Local Plan. However, our discussions with the clinical commissioning groups and local surgeries are part of an ongoing process of consultation.
DCLP/161 Mr David	There needs to be County wide cooperation on delivery of a sub- regional and county coordinated infrastructure plan which is	Comment is noted. All Leicestershire local authorities, Leicestershire County Council and the Leicester and Leicestershire Local Enterprise
	1113	

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Campbell-Kelly	properly funded before commitment to strategic growth plan aspirations.	Partnership supported the preparation of the Strategic Growth Plan which sets out a vision for growth to 2050. Collaborative working takes place to secure this vision.
DCLP/191 Quorndon Parish Council	Quorndon Parish Council believes that more support should be given to the adequate provision and funding of schools and health centres. The Parish Council encourages the Borough Council to adopt fully the CIL process as having an uncapped 25% would be of benefit to the parish with its local knowledge of where funding could be best targeted.	We are working closely with Leicestershire County Council and the clinical commissioning groups so that we understand how needs would be addressed. We note your comments about the Community Infrastructure Levy.
DCLP/210 Rosebery Medical Centre	Concerned about the provision of General Practice services for the new population as General Practice is currently struggling to recruit the workforce that is needed to adequately address the needs of the current population and will struggle to provide any additional capacity.	We note your comments. The provision of adequate health care is an important consideration and we will continue to work closely with the West Leicestershire Clinical Commissioning Group to assess how these needs might be addressed.
DCLP/256 Vale Planning Consultants	Allocated sites should be well located to take advantage of existing infrastructure assets within its administrative boundary and also within the neighbouring authority of Leicester City. New development should be of a scale and design which ensures that any necessary infrastructure requirements are delivered at an appropriate time within the construction process.	Agreed.
DCLP/276 East Leicestershire & Rutland Clinical Commissioning Group	The council needs to ensure impact on healthcare is adequately considered and addressed.	The provision of adequate health care is an important consideration and we will continue to work closely with the East Leicestershire Clinical Commissioning Group to assess how these needs might be addressed.
DCLP/377 Mr John Barton	Questions why all state senior schools are crammed together on the western side of Loughborough.	Leicestershire County Council is the education authority and responsible for schools. We are working with them to address the educational needs of new development.
DCLP/414 Cossington CE Primary School	Calls for the council to set up a platform for all schools likely to be affected by these proposals to look at solutions for providing places.	We would like to continue to discuss the plan's proposals with all interested parties. The in principle expression of interest in expanding to meet the need for
	Cossington CE Primary School expresses an in principle willingness to expand to meet the need for places but investment would be needed and we would not want to be seen as competing with other schools for children out of our catchment. Money for	new places is noted.

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	schools from developers is essential for this and a forum for all schools to input towards a sustainable plan.	
LDCLP/02 Anonymous	Make sure the new schools are built on time with staff toilets	Noted, but this is a detailed operational issue rather than an issue for the Local Plan.
LDCLP/35 Dr Gareth Chidlow The Country Practice	Objects to the draft Charnwood Local Plan on behalf of the County Practice because additional development will lead to unsustainable pressure on local health services. The practice list size has already gone up this year from 12,200 to 12,750 and also serves parts of Melton Borough.	Comments are noted.
LDCLP/22 Anonymous	Concerned that new housing will lead to higher birth rates which will lead to greater pressure on maternity services which are already on the point of collapse.	We note your comments. We are working closely with the clinical commissioning groups, but maternity services are an operational issue for the health service to address.
LDCLP/51 Anonymous	The Local Plan should address the reliance on the private car. The whole of Charnwood is grinding to a halt and unstainable in its present form. All unseen infrastructure is at capacity and not far off breaking point.	The Borough Council is working closely with Leicestershire County Council to assess the transport impacts of the plan and policies within the plan will promote public transport, walking and cycling. More generally we are working to ensure that adequate infrastructure is in place to service the development proposed.
EDCLP/31 Barkby & Barkby Thorpe Parish Council	Adding more than 1500 households, possibly 4000 people, will be a burden on Doctors' surgeries and schools which are already oversubscribed in the Syston, Barkby and Queniborough areas.	It is essential that adequate education and health services are provided for new development and we are working closely with Leicestershire County Council and the Clinical Commissioning Groups so that needs are addressed.
EDCLP/32 BABTAG	Doctors' surgeries and schools are already oversubscribed in the Syston, Barkby and Queniborough area and social services are under enormous pressure. Does it make sense to add more than 1500 households, possibly 4000 people as an additional burden?	It is essential that adequate education and health services are provided for new development and we are working closely with Leicestershire County Council and the Clinical Commissioning Groups so that needs are addressed.
EDCLP/36 Mr & Mrs Atkins	Doctors' surgeries and schools are already oversubscribed in the Syston, Barkby Doctors' surgeries and schools are already oversubscribed in the Syston, Barkby and Queniborough area and social services are under enormous pressure. Does it make sense to add more than 1500 households, possibly 4000 people as an additional burden?	It is essential that adequate education and health services are provided for new development and we are working closely with Leicestershire County Council and the Clinical Commissioning Groups so that needs are addressed.
EDCLP/43 Mr & Mrs Cunningham	Doctors' surgeries and schools are already oversubscribed in the Syston, Barkby and Queniborough area and social services are under enormous pressure. Does it make sense to add more than 1500 households, possibly 4000 people as an additional burden?	It is essential that adequate education and health services are provided for new development and we are working closely with Leicestershire County Council and the Clinical Commissioning Groups so that needs are addressed.
EDCLP/52 Shepshed Town	Concerned at the lack of reference to the A512 in Chapter 9 as there is to be 2/3 years work on this road in Shepshed, causing	The Borough Council is not the highway authority but discussions with Leicestershire County Council and the Highways Agency take place

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Council	 congestion and a huge increase in emissions from resulting traffic. Calls for the chapter to set out detailed plans for the area and what mitigation measures are to be introduced. Internal roads in Shepshed are under great pressure from the increase in population leading to greater vehicular travel. The upgrading of Tickow Lane and the railway bridge is much needed due to the increased traffic flow of internal roads and there is a lack of sustainable public transport. Concerns are also expressed about the inadequacy of the existing drainage and sewerage system which will not cope with the increase in rainfall. 	regarding the impact of development proposed in the plan and the mitigation that needs to be put in place to address those impacts. The Local Plan will promote sustainable transport such as public transport, walking and cycling so as to reduce the impact of development upon congestion. A Strategic Flood Risk Assessment has been commissioned to inform the plan.
EDCLP/55 Sileby Parish Council	Sileby Parish Council considers that the plan should have been subject to viability assessment before it was published for consultation and that the viability assessment should have been published alongside the plan. The assessment should have had regard to whether draft policies are realistic and the plan as a whole is sound.	Comments are noted. The consultation was an additional non statutory stage of plan preparation. The Local Plan will be subject to a Whole Plan Viability Assessment.
EDCLP/61 Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd	Concerned about viability and in particular the relationship between the provision of affordable housing and other S106 contributions. A recent review of the County Council's Planning Obligations Policy (July 2019), is likely to result in contributions of more than £12,000 per new dwelling for education, health, highways and transportation, adult social care, waste recycling, libraries, sport and recreation, community safety, economic growth etc. This is double the assumption used in the Viability Assessment to determine levels of affordable housing. To ensure viability and to ensure a balanced approach to the delivery of affordable homes, the costs of infrastructure including public transport services, need to be considered together.	We will be undertaking a thorough analysis of the infrastructure needs of the plan because it is important that the infrastructure needs required to service new development are fully assessed and provision put in place. We also understand that viability needs to be taken into account to ensure that deliverability is not jeopardised.
EDCLP/69 George Dunning	The impact of future large scale developments will negatively impact on local schools and doctors which are already full. It would also increase the risk of flooding, lead to more road construction and light pollution. There will also be more demand on local policing as the Loughborough Response Hub already covers a very big area and officers across the whole Force are already stretched.	It is essential that adequate education and health services are provided for new development and we are working closely with Leicestershire County Council and the Clinical Commissioning Groups so that needs are addressed. We are commissioning a more detailed Level 2 Strategic Flood Risk Assessment to build on the Level 1 Assessment undertaken in 2018.
EDCLP/78	Concerned that the significant increase in proposed housing in the 1116	Comments on local policing are noted. Comments are noted. We understand that new residential development

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Queniborough Neighbourhood Plan Steering Group	local area e.g. Syston, Queniborough, East Goscote and Rearsby will put an unprecedented strain on local services and infrastructure. Queniborough Primary School is full and there are no medical facilities in Queniborough. It is already very difficult to get a doctor's appointment in less than two weeks at the GP Practice in Syston. The closure of the health centre at East Goscote has further added to the problem of health care in the area.	will require additional investment in local infrastructure and will work with Leicestershire County Council and the clinical commissioning groups to achieve this.
EDCLP/86 Rothley Parish Council	The Rothley Academy Primary School is already oversubscribed and there are as yet no agreed plans for an extension. If the proposed Broadnook development proceeds it is essential that it should have a school and that this school should be built at the earliest possible stage of the development and included in the Local Plan. Rothley Parish Council would like to see the proposed Broadnook Health Centre included in this section and for conditions to be included to ensure it is delivered at the earliest possible stage as a part of the Broadnook development. Attention is also drawn to the interim Sustainability Report which states that the sites are not within walking distance of current health facilities in Rothley. Forward planning of health provision should be done in advance of the new housing proposed by this Local Plan to ensure that existing health provision is not compromised.	We will work with Leicestershire County Council as education authority to resolve issues concerning education provision and the clinical commissioning groups regarding health impacts. We note your comments about Broadnook.
EDCLP/91 Queniborough Parish Council	Concerned that the Local Plan is asking Queniborough to take 287 houses of the 800 for other settlements, together with 223 at East Goscote, and 47 at Rearsby which totals 557 out of the 800, or 70% of this total. This together with another 1,191 houses in Syston will put a completely unprecedented strain on services and infrastructure. It is already very difficult to get a doctor's appointment in under two weeks and parking in Syston is problematic at busy times. The closure of the health centre at East Goscote has further added to the problem of health care in the area.	We appreciate your views and will work with Leicestershire County Council as education authority to resolve issues concerning education provision and the clinical commissioning groups regarding health impacts.
EDCLP/121 Marie Birkinshaw	Having community plans in place for areas before building and getting doctors' surgeries and schools and green spaces in initial builds should be important, along with public transport.	Needs can be assessed as part of the plan making process but delivery is usually funded by developers and therefore can take palce as development takes place.
EDCLP/125	Ensure that County Council is on board with plans and that 1117	We are working closely with the County Council in the preparation of the

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Tim Birkinshaw	developers are not allowed to weasel out of their responsibilities.	plan.
EDCLP/128 Woodbrook Vale School	Woodbrook Vale School is not opposed to the Draft Charnwood Local Plan (2019-36) Preferred Option but is concerned about the potential impact on the education of children in our local community.	We appreciate the detailed information on the numbers of admissions to your school and acknowledge that numbers have risen in recent years. In formulating our proposals we seek the widest possible engagement and involvement of all interested parties.
	The local plan preferred option envisages a potential total of 1,054 homes within Woodbrook Vale School's catchment – largely to the west and south of the school ,which using Leicestershire County Council's yield rate of 16.7 per 100 homes of two or more	The Government sets out consultation procedures which we must adhere to but these are minimum requirements and we always willing to listen to local views from the community.
	bedrooms would ultimately produce about 170 11-16 year old children of which we suspect at least 150 might want to come to Woodbrook Vale School - 30 per year group.	We wrote to the head teachers of all schools in Charnwood in October 2019 to alert them to the plan and invite their views, and we hope this continues as the plan progresses. However, it is important to stress that in planning future educational provision we need to be guided by
	Woodbrook Vale School has become increasingly oversubscribed over several years and this represents a very significant jump in demand. Our planned admissions number is 160 each academic	Leicestershire County Council who have statutory responsibility for school place planning.
	year, but for example in our 2017-18 admissions cycle we were the first choice school for 244 children. The school does not like to refuse places to children from our local community who wish to come to Woodbrook Vale School.	The Borough Council is therefore working closely with Leicestershire County Council to ensure that school places are available to serve new housing developments. We would also expect that the County Council would ensure adequate consultation at the appropriate time with any schools that will be affected by proposals in the plan.
	There is a need for the above concerns to be addressed through the planning process, starting with Charnwood Borough Council working closely with Leicestershire County Council. Early discussion should involve local Borough and County Councillors	
	and the governing boards of the local schools (including in this case the local Primary Schools) as these are the people who understand the local community best as it pertains to education.	
	We all wish to maintain the current excellent quality of education in this part of Loughborough, and this will most likely be achieved by collaboration during the planning process.	
	If expansion of schools is required then section 106 and other funding should be designed into the process at an early stage to facilitate this. Woodbrook Vale School's buildings are at full capacity. Additional investment would be needed if Woodbrook Vale were asked to take on extra secondary age children.	
	Ask that education provision decisions that affect the local community should not take place without involving Woodbrook Vale	

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	School. A formal consultation process alone will not achieve the level of involvement required.	
EDCLP/143 CPRE	Contributions to education and health need to be part of the contributions arising from developments. The questions do not	The wording of the policy will be reviewed as part of plan preparation.
Leicestershire and its	seem to relate to any specific policy. They relate to "infrastructure provision" and the viability of public transport services. It seems the	Infrastructure relates to the full range of services required to make development happen and address the impacts of development.
Charnwood District Group	Council believes infrastructure provision relates mainly to road improvements which are essential to support development.	We need to work with Leicestershire County Council regarding transport issues including bus services and their support.
	It also seems that the Council has not commissioned any work to assist it with regard to the creation of an active travel network, a	We will prepare an Infrastructure Delivery Plan to support the plan. This
	comprehensive bus network or bus service viability.	will provide more detailed information on funding and timescales for delivery.
	There is a reference in 9.16 to the production of an Infrastructure Delivery Plan but there is no indication of what it would contain or	
	when it would be produced. It seems likely that a main focus of an IDP would be to increase road capacity.	
EDCLP/147 Hoton Parish	These pages discuss some infrastructure issues but appear to have no corresponding policy. It isn't clear how these ideas will be	Noted – the Council is preparing an IDP, and is also discussing infrastructure priorities with the statutory infrastructure providers.
Council	put into practice and ensure that adequate infrastructure is put into place to support the cumulative impact of development that results	The policy framework in the draft local plan sets out a series of
	from a succession of smaller housing developments in and around the villages.	requirements for supporting, improving, and providing new infrastructure.
	The total number of new homes with planning permission in Barrow	Subject to the evidence in the IDP and discussions with statutory providers, a specific policy may be drafted in the next version of the local
	upon Soar over the past 10-15 years should have required a new	plan.
	school to be built, but instead there has been expansion of an existing building with each successive development, resulting in a	
	school that is cramped and poorly laid out with insufficient non- classroom space for the number of children on the roll. There are	
	similar problems associated with the medical facilities in that village, which caters for many of the surrounding villages which	
	have also seen development.	
	There is a need to work with the County Council, health services and other relevant bodies to plan for infrastructure in the long-term	
	(over the whole period of the plan) and not just on an application- by-application basis.	
EDCLP/268	Large housing development in Shepshed and the surrounding area	We note your comments concerning the consequences of further housing
Forest House	will add pressure to the Primary Care Services provided by Forest House Surgery which is the largest Surgery in Shepshed and	development upon primary care services in Shepshed. This is an important issue which we are discussing with the West Leicestershire
Surgery	House Surgery which is the largest Surgery in Shepshed and	Important issue which we are discussing with the west Leicesterstille

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	currently holds a list size of 11,814 patients, and due an open list policy, the list size has increased by 300 patients over the last 12 months. The surgery cares for the largest number of Care Homes (holding around 300 patients) in North Charnwood and as a practice has a high percentage of over 60 year olds and multi- comorbidity patients.	Clinical Commissioning Group.
	Expanding the list size will increase workload pressure on Forest House Surgery, increasing registrations, medication management, including prescribing, primary care services, including appointments with clinicians, pressure on chronic disease clinics, including diabetes, asthma, COPD etc, pressure on reception due to increase of population.	
	Currently Forest House Surgery has 16 Clinical Rooms and this is just meeting the current demands. If Forest House Surgery was to increase its list size due to the proposed housing development, then Forest House Surgery would require an expansion of space to avoid breaking point. Forest House Surgery, therefore, would need access to 106 money 'up-front' in order to invest in the infrastructure, by means of an extension to the current building. Forest House Surgery would request the council to consider giving planning permission for our Grade II listed building.	
	General Practice is currently finding difficulty in recruiting GP's Nurses, and non –clinical staff; hence any increase in list size will have a further impact on our current workforce.	
EDCLP/157 Lorraine Davies Mountsorrel Parish Council	The experience in the recent past has been a stream of individual, ad hoc and incremental expansion schemes which place a burden on public services, facilities and infrastructure - with transport (especially public transport}, education and health care experiencing negative pressure. This is regarded as the antithesis of good planning.	The purpose of preparing a local plan is to seek to promote sustainable development through an evidence based approach.It is unplanned development which is most likely to give rise to pressures on infrastructure.
	In this Parish Council's view, the most vital issue facing Charnwood's planning regime over the immediate and longer term is to ensure that facilities and infrastructure keep pace and ideally precede further growth. The most important document therefore will be a robust, reliable and viable Infrastructure Delivery Plan and that is where, in progressing the new Local Plan, Charnwood's efforts and priorities should be concentrated.	We are working with infrastructure providers to find sustainable solutions to accompany growth. This will be set out in an Infrastructure Delivery Plan.

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EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	New schools should have a provision for greenspace to allow children to interact with nature and also the benefits to health and wellbeing from this.	Agreed.
EDCLP/226 Eleanor Hood	Concerned at the lack of policy statement on education and health.	We are working closely with Leicestershire County Council and the Clinical Commissioning Groups to fully assess the health and education impacts.
EDCLP/254 Ian Deverell Turley on behalf of Rainier Developments Ltd)	Rainier considers that the process of publishing preferred options ahead of the preparation of the IDP is incorrect and raises questions over the plans ability to correctly respond to infrastructure constraints through the plan making process. The identification of known infrastructure constraints should be a key factor in the consideration of housing need and identifying an appropriate spatial strategy which can realistic respond to and seek to alleviate existing and future capacity constraints.	We will prepare an Infrastructure Delivery Plan to accompany the plan. This will be informed by ongoing work to ascertain the full range of infrastructure requirements which will be required to support development.
EDCLP/255 Ian Deverell Turley on behalf of Rainier Developments Ltd (Wymeswold)	Rainier considers that the process of publishing preferred options ahead of the preparation of the IDP is incorrect and raises questions over the plans ability to correctly respond to infrastructure constraints through the plan making process. The identification of known infrastructure constraints should be a key factor in the consideration of housing need and identifying an appropriate spatial strategy which can realistic respond to and seek to alleviate existing and future capacity constraints	We will prepare an Infrastructure Delivery Plan to accompany the plan. This will be informed by ongoing work to ascertain the full range of infrastructure requirements which will be required to support development.
EDCLP/241 L.Tomalin	With all the increase in housing there needs to be a lot of improvement in the general infrastructure.	Agreed.
EDCLP/228 Haddon Way Residents Association	The Infrastructure Delivery Plan is as important as the Charnwood Local Plan as it is these two documents combined that should show to residents, developers and investors where future development of Loughborough will be.	We will prepare an Infrastructure Delivery Plan to accompany the plan. This will be informed by ongoing work to ascertain the full range of infrastructure requirements which will be required to support development.
	Charnwood really needs to look at the borough as a whole and how it should develop over the next 100+ years. Piece meal development of small "major" developments does not appear to result in facilities and infrastructure to these communities.	The Local Plan will have regard to the longer term vision of the Leicester and Leicestershire Strategic Growth Plan. Ensuring infrastructure is provided in a timely fashion is a key issue for the Local Plan, and we are working with infrastructure providers to
	Charnwood Borough Council needs to begin to dictate where facilities and infrastructure for its residents are needed first, before	achieve this.

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	the housing developments go in and when approving planning permission that developers are encouraged to put in the facilities and infrastructure before any housing construction commences. Penalties should be made for developers not delivering infrastructure.	We are not allowed to ask developers to contribute towards the cost of existing deficiencies of infrastructure but we can ask them to contribute towards the impacts of new development.
	Proposed development sites around Haddon Way Estate our estate are:	
	 HS30 has been waiting to be developed for 10+ years (15 dwellings) HS31 already in the eyes of the planners fails the sustainability test, (24 dwellings) HS35 is separated into 2 parcels of land comprising of 334 dwellings HS36 is separated into 3 parcels of land comprising of 544 dwellings, 2 separated by site HS37 and the other some distance away. While HS37 is a single unit of 83 dwellings. 	
	This totals 1000 dwellings to the south of Loughborough, where these sites are all far away from bus services; the road network to reach them is comprised of residential streets; the schools surrounding these sites are already over subscribed and can't take on any more students and there are no local medical facilities nearby.	
	Whilst identifying these sites as suitable for housing is admirable, existing local residents require infrastructure and facilities. This plan makes no reference to these facilities and infrastructure, only commenting that the council will prepare a delivery plan to understand what is required and how that can be provided. Our gravest concern is that that plan will come too late for those future residents.	
EDCLP/228 Haddon Way Residents Association	Draft Policy LP34) We believe that that the local and strategic Road Network should be looked at first. We believe that CBC should prioritise where infrastructure should go first, before housing, as we believe housing is determining where infrastructure should be retrospectively deployed.	Our preferred development strategy aims to direct development to locations that provide access to jobs, services, infrastructure and sustainable travel options. The Borough Council is involved in discussions with infrastructure providers to ascertain infrastructure needs and how these can be

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	How can we plan in a suitable road network that are suitable for buses to get these new residents to schools, medical practices and other services that they may need? Surely the council should be planning for where main roads, hospitals/medical centres and schools should go first, with the road network planned in to serve these areas appropriately.	addressed. These will be set out in an Infrastructure Delivery Plan which will inform the Local Plan. The delivery of infrastructure can take place in various ways which will depend on the type of infrastructure required and when it would be required to enable the development to take place or mitigate its impacts.
	If these were planned in first the roads would be appropriate for further development in the future, which wouldn't need remedial work. Local Plan Para 9.16) We note that the current infrastructure delivery plan is dated March 2013 we believe this is as important as the Charnwood Local Plan as it's these two documents combined that should show to residents, developers and investors where future development of Loughborough lie. The summary plan comments that: • Delivery and Viability: The draft plan states that the Council will prepare an Infrastructure Delivery Plan and viability assessment to better understand the infrastructure that is required to support development and how that can be provided. But surely the reverse is true: infrastructure is required to support development. NOT understanding the infrastructure that is required to support development. Charnwood really need to look at the borough as a whole and how it should develop over the next 100+ years. Piece meal development of small "major" developments doesn't appear to result in facilities and infrastructure to these communities. They haven't to ours. CBC need to begin to dictate where facilities and infrastructure for its residents are needed first, before the housing developments go in. Because it is impossible to retrospectively put these in. CBC should also ensure that when approving planning permission that developers are encouraged to put in the facilities and infrastructure first before any housing construction commences. Penalties should be made for developers not delivering infrastructure.	We agree that the provision of infrastructure is essential but it nevertheless needs to be provided in a timely fashion. Providing all of the infrastructure in advance of development would not be practical, a good use of public money or viable for private sector developers. The timescale of the local plan is to 2036 but we are also taking into account the Leicester and Leicestershire Strategic Growth Plan which has a timescale to 2050.
EDCLP/161	It must be ensured that there is sufficient infrastructure to support	Infrastructure provision is a key issue for the Local Plan. The Borough

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Councillors Gill Bolton and Alice Brennan Shelthorpe Ward	the residents where new developments are approved This infrastructure includes roads, schools, medical centres, shops and public transport. We ask that the Council works with developers, the County Council and the NHS to ensure that plans for infrastructure are in place before building begins.	Council is working with infrastructure providers to ensure that infrastructure requirements are fully assessed and provided for.
EDCLP/162 Councillors Kat Goddard and Dr Julie Bradshaw, Ashby Ward	Issues around education facilities are of some concern in this draft plan. The proposed map for development has no sites indicated for new schools, and no clear indication of a solid plan for this in the draft local plan. 9.14 of the plan states "where a single housing development, or a group of housing developments within the same geographical area, require a new school, or schools to be provided, then developer will be expected to provide land and pay for construction costs". In point 7.13.9 of the Charnwood Local Plan Sustainability Appraisal: Spatial Strategy (Part of the Cabinet Papers for the 17th of October 2019), it is stated that, for the sites proposed for allocation of housing in Loughborough 'In the short and medium term secondary provisions at some schools could be under pressure in the longer term the picture is less clear'. In Shepshed the plan for schools is even bleaker, point 7.13.12 of the Spatial Strategy states, that in Shepshed 'Primary schools could have some shortages in places, whilst the secondary school could be significantly short. There are potential significant negative effects for the residents of Shepshed in the longer term with regards to access to education.' Developers being 'expected' to provide infrastructure is not a strong enough commitment to ensure that our young people have 'improved access to education'. This must be a requirement of the developers, a requirement to provide the infrastructure that is not being laid out in the draft local plan. This council cannot continue to allow housing development in Shepshed with complete disregard for the wants and needs of residents living there	
EDCLP/158 Mrs J Brettle- West	The Rothley Academy Primary School is already oversubscribed and there are as yet no agreed plans for an extension. If the proposed Broadnook development proceeds it is essential that it should have a school and that this school should be built at the earliest possible stage of the development. Such a commitment should be included in the Local Plan	The Borough Council is working closely with Leicestershire County Council to ensure that school places are available to serve new housing developments.

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EDCLP/239 Jonathon Barratt- Peacock	Considers that Rothley should not be classed as a Service Centre as it does not have the ability to provide for the everyday needs of its community. A GP surgery is one of the most essential services but Rothley does not have a GP surgery so residents cannot register with a practice near their home. Also stated that school places are insufficient for the population. Class sizes in secondary schools are around 36 pupils and many pupils cannot get a place at their catchment school.	The definition of a service centre in the plan has regard to a basket of facilities and an overall assessment of the role and function that the centre provides. The Borough Council is working closely with Leicestershire County Council to ensure that school places are available to serve new housing developments.
EDCLP/239 Vivienne Barratt- Peacock	Considers that Rothley should not be classed as a Service Centre as it does not have the ability to provide for the everyday needs of its community. A GP surgery is one of the most essential services but Rothley does not have a GP surgery so residents cannot register with a practice near their home. Also stated that school places are insufficient for the population. Class sizes in secondary schools are around 36 pupils and many pupils cannot get a place at their catchment school.	The definition of a service centre in the plan has regard to a basket of facilities and an overall assessment of the role and function that the centre provides. The Borough Council is working closely with Leicestershire County Council to ensure that school places are available to serve new housing developments.
EDCLP/211 Cllr Margaret Smidowicz	Questions whether discussions are taking place with respect to local hospital provision and care facilities to cater for the growing needs of an aging population.	Discussions are ongoing with both Leicestershire County Council and the Clinical Commissioning Groups.
EDCLP/252 Leicestershire County Council	The Local Plan should provide a robust policy framework for ensuring that the cumulative impacts of growth (both within and without the borough) are properly understood, the approach to mitigation is clearly identified and the costs and approach to funding for supporting infrastructure and mitigation is clear. This may include the need for comprehensive masterplanning across sites, the development of supporting strategies and the development of an agreed approach to the funding and cash- flowing of mitigation/supporting infrastructure. The Local Plan should also have due regard to the potential longer- term strategic growth and infrastructure requirements (including transport) within the "south east Charnwood" area (i.e. Syston, East Goscote etc.) as part of the Strategic Growth Plan's "A46 Priority Growth Corridor".	We are working to ensure that the impacts of growth are fully understood and planned for. A range of studies have been commissioned to provide a robust evidence base to inform our policies. This work has included the consideration of cross boundary impacts. The Leicester and Leicestershire Strategic Growth Plan has informed the plan's policies including providing for growth associated with the A46 Corridor.
EDCLP/252	The Children and Family Services Department at the County	We welcome your engagement in working to assess and provide for

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Leicestershire County Council	Council is liaising with Charnwood Borough Council on the requirements for education arising from the draft Local Plan.	educational needs arising from the plan.
DCLP 266 Leicester City Council	There is close chronological and plan-period alignment between the draft Local Plan and the City Council's forthcoming draft Local Plan.	We welcome your comments regarding the importance of joint working across our local authority boundaries and we will continue to work closely with Leicester City Council to resolve all key issues.
	That part of Charnwood's preferred spatial development strategy which would direct a proportion of the Borough's growth to Leicester's urban edge, and the geographic location of the City's Council's emerging strategic development opportunities, means that there is potential for a substantial increase in demand for infrastructure particularly to the north/north-west of the principal urban area of Leicester.	
	The City Council looks forward to co-operation with Charnwood Borough Council and other authorities to ensure that our communities are provided with the infrastructure needed to support growth either side of the administrative boundary. Our officers will need to work particularly closely together in respect of open space and sports provision, the integration of walking and cycling links, school place planning, sustainable transport planning, and mitigation of climate change impacts such as flooding.	
DCLP 266 Leicester City Council	Leicester City Council would like to see an educational strategy to manage the cumulative impact on schools (including those within the City) as a result of the development at Thurmaston and Syston.	We appreciate your comments on the need to consider the educational impacts of development.
	The City Council has identified that the following schools are in close proximity to proposed allocations at Thurmaston and Syston: Sandfield Close Primary; Hope Hamilton Primary; Kestrel's Field Primary; Buswell's Lodge Primary; Rushey Mead Primary; Soar Valley College; Hamilton Academy, New College; and Babington Academy.	The Council is engaging with Leicestershire County Council on education matters, and would welcome the opportunity to engage with Leicester City Council on this topic.
DCLP 266 Leicester City Council	The Borough Council should work closely with the City Council on cross boundary infrastructure, especially relating to key areas such as education ,transport and leisure. The City Council wishes to	We are working to ensure that the impacts of growth are fully understood and planned for.
	engage in detailed DTC and potentially SCG dialogue over any future Infrastructure Assessment and Viability Assessment to optimise benefits and mitigate any cross boundary impacts on the City.	The Council would welcome the opportunity to engage with Leicester City Council on these topics. The Council expects to draft a Statement of Common Ground with Leicester City Council. The Statement of Common Ground will cover a number of matters, including infrastructure provision.
	1106	A range of studies have been commissioned to provide a robust

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DCLP/261 Edward Argar MP	In respect of paras 9.12-9.15, while there is a degree of clarity about seeking investment from developers in education infrastructure, the commitment in respect of investment in NHS	 evidence base to inform our policies. This work has included the consideration of cross boundary impacts. The Borough Council is working to fully assess and provide for the provision of education and health services and facilities to accompany growth. We are working closely with Leicestershire County Council and
	infrastructure, including GPs, to meet increased demand is less clear and I believe needs to be strengthened. In this context, in the references to the Birstall proposals, while education facilities are included, NHS facilities appear to be omitted	the Clinical Commissioning Groups to this effect.
DCLP/153 Mr David Campbell-Kelly	Commitment to large scale development should only be given when there is full and complete commitment to infrastructure across all Authorities	We note your comment. Large scale development usually requires significant investment in infrastructure. The development management process will consider each planning application in the light of the plan's policy requirements.
DCLP/275 East Leicestershire & Rutland Clinical Commissioning Group	The impact on healthcare needs to be identified as a key priority.	Healthcare is an important issue and we are working closely with the clinical commissioning groups to assess needs and agree priorities.
Q41b What steps could	the Council and its partners take to ensure that a comprehensive	e network of public transport services remains available?
DCLP/3 Mr Toby France Arriva Midlands	The Council needs to take a more pro-active approach to liaison with the commercial functions of both of the major local bus operators because Leicestershire County Council no longer has the resource to manage this relationship in the way they have historically. Charnwood BC needs to understand which services are provided commercially, which are supported, and what the realistic future of	We welcome your comment but note that Leicestershire County Council has a statutory responsibility for transport planning. We welcome the opportunity to work with LCC and the bus operating companies to understand where services could be enhanced, and/or new services provided. The Council is producing a Sustainable Transport Study and this response will be used as an input into that work.
	these services is before a view can be taken on how they can be enhanced or new services added.	
DCLP/92 Mr Dennis Marchant	Public transport is key to helping to provide mobility for residents as well as being essential in encouraging people to move from car use. The Borough Council in collaboration with County and Parish Councils could do a lot more to support the provision of regular and reliable services not only during the working week but in the evenings and at weekends. A key element is the use of advertising and social media to advertise the services by council and the service providers.	We appreciate your comments – the Council is working proactively with Leicestershire County Council (and other partners, including Parish Councils) to ensure that sustainable transport provision is promoted and supported.

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DCLP/191 Quorndon Parish Council	Public transport is key to helping to provide mobility for residents as well as being essential in encouraging people to move from car use.	We appreciate your comments – the Council is working proactively with Leicestershire County Council (and other partners, including Parish Councils) to ensure that sustainable transport provision is promoted and supported.
	Quorndon Parish Council is of the view that the Borough Council in collaboration with the County and Parish Councils could do a more to support the provision of regular and reliable services not only during the working week but in the evenings and at weekends. One element to improve usage could be the use of advertising and social media campaigns with the operators to advertise the available services.	
DCLP/256 Vale Planning Consultants	Considers that proposed sites for allocation should seek to enhance and contribute towards public transport provision.	We agree that development proposals should seek to contribute towards sustainable transport measures.
	The proposed allocation at Gynsill Lane / Anstey Lane is capable of delivering a new public transport route through the comprehensive development of this site, along with additional land to the south (within Leicester City), and therefore we would encourage the reassessment of proposed allocation HS5, to incorporate the entirety of my client's landholding.	We note your comments which will be considered in the preparation of the plan.
LDCLP/02 Anonymous	Make sure Shepshed west has bus stops and is on the route.	The draft policy for Sustainable Transport makes provision for new and enhanced bus services. Detailed provision would be considered during the development management of an application.
LDCLP/34 Anonymous	Considers that a network between the bus providers, passengers and Council officials be established to assess which services meet the needs of citizens and what improvements are needed.	We note your comment but would emphasise that Leicestershire County Council has a statutory responsibility for transport planning and we will therefore have to work with them to resolve these issues.
LDCLP/51 Anonymous	Considers that clean cheaper reliable bus services should be promoted to encourage car use for journeys to school while school children living within 1 and half miles of their school must be made to walk cycle or take a bus to start to change the gridlock and pollution problems.	We note your comment but these are matters for Leicestershire County Council which has statutory responsibility for education and transport planning.
EDCLP/38 John Malpus	Encouraged by the proposal to reduce travel by car albeit with some misgivings.	We welcome your comment but would note that Leicestershire County Council has statutory responsibility for transport planning.
	Access to Loughborough is restricted by the lack of direct services to and from East Goscote, Queniborough and Rearsby and Leicestershire County Council is currently looking at drastically reduce public transport subsidies.	
EDCLP/55	Sileby Parish Council considers that greater emphasis should be	The draft policy for Sustainable Transport makes provision for new and

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Sileby Parish Council	given to securing co-ordinated long term provision of improved public transport services, particularly in the rural parts of the Borough.	enhanced bus services. Detailed provision would be considered during the development management of an application.
	Given the connectivity between the urban and rural parts of the Borough large scale housing developments in urban areas and higher order settlements within the settlement hierarchy should be expected to contribute towards the provision.	
EDCLP/108 Sue Barry	Concerns expressed about the accessibility and affordability of public transport.	Concern is noted.
EDCLP/121 Marie Birkinshaw	Greater investment (in public transport) is required and getting it out of the hands of County Council along with lobbying promoting increased local awareness and enforcement.	We welcome your comments but would note that Leicestershire County Council has a statutory responsibility for transport planning and we will therefore have to work with them to resolve these issues.
	(Public transport) should be much more joined up to local economy and its needs.	The draft policy for Sustainable Transport makes provision for new and enhanced bus services. Detailed provision would be considered during the development management of an application.
EDCLP/125 Tim Birkinshaw	Public transport (or at very least the detailed plans for provision) should be in place before developments are started so that occupiers (be they residents of employers) know what transport options are available.	Comments are noted.
EDCLP/143 CPRE Leicestershire	The questions do not seem to relate to any specific policy. They relate to "infrastructure provision" and the viability of public transport services which makes it seem that the Council believes	Infrastructure provision includes a range of services and facilities which will be set out in an Infrastructure Delivery Plan.
and its Charnwood District Group	infrastructure provision, mainly in the form of road improvements, is essential to support development.It also seems that the Council has not commissioned any work to assist it with regard to the creation of an active travel network, a	The focus of the plan will be to provide the necessary infrastructure to support the planned growth within the borough. As part of this, promoting and enhancing sustainable transport is a primary aim of the draft local plan.
	comprehensive bus network or bus service viability.	We have commissioned a sustainable transport study and will work closely with Leicestershire County Council and Leicester City Council to
	There is a reference in 9.16 to the production of an Infrastructure Delivery Plan but there is no indication of what it would contain or when it would be produced.	pursue sustainable transport options through the development management process.
	It seems likely that a main focus of an IDP would be to increase road capacity.	

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EDCLP/147 Hoton Parish Council	Many rural locations don't have a bus service to the medical facilities and other services that the residents need. Consultation with the councils and residents on the routes required is needed. The cost of train and bus travel is prohibitively expensive for many residents, particularly those with families. Until this is addressed public transport will remain unattractive for most people.	Comments are noted.
EDCLP/252 Leicestershire County Council	In the context of the County Council's Passenger Transport Policy and Strategy the onus is placed on site promoters to come forward with passenger transport proposals appropriate to the scale and nature of their development as opposed to seeking financial payments through S106 agreements. This approach recognises the increasing financial challenges of supporting non-commercial, traditional bus services and potentially requires alternative solutions such as demand responsive transport or community initiatives to be explored.	We note the comments of Leicestershire County Council regarding Section 106 contributions for sustainable transport. The Council expects to work directly with LCC to understand the impact of proposed development sites on the transport network, and to jointly agree what transport infrastructure mitigation is necessary to support planned growth.
DCLP/261 Edward Argar MP	Question 30 - In referring to the need to secure funding for new bus routes where appropriate, the policy should seek to secure that funding to ensure that the service is set up and retained (funded) for a long period.	 We work closely with Leicestershire County Council and Leicester City Council who are the responsible transport authorities. Ongoing revenue support for bus services through Section 106 contributions cannot be open ended but must be defined for a period of time in the Agreement during which we would hope that sustainable transport behaviours can be established.
Chapter 10 -	Strategic Allocations	
Do you have any o If you don't agree Do you think we h	h of Birstall Sustainable Urban Extension comments on this draft policy? with the proposed policy please set out why and what alternative ave missed something?	
DCLP/278 East Leicestershire & Rutland Clinical Commissioning Group	GP services appears to be missing	The Council is in dialogue with each of the CCGs. The Council would welcome the chance to work with EL&R CCG to agree the practical and deliverable steps that can ensure the SUE supports the healthcare infrastructure required. Consider wording changes to Draft Policy LP36 and strengthen references to minimise impacts on healthcare services, and delivering
DCLP/293 Natural England	Natural England welcomes the requirement for a Green Infrastructure Strategy but also suggests that opportunities for Net Gain should be considered at the earliest stages of development. We recommend the use of the new Defra Biodiversity Metrics to limit the damage to nature and ensure positive gains for	new/improved infrastructure where required. The fourth bullet point under the Environment sub-heading does reference biodiversity networks. However, the Council wishes to discuss with the NE how to improve and strengthen the policy wording to ensure biodiversity impacts are minimised and the SUE can achieve positive biodiversity gains.

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	biodiversity.	Similarly, Draft Policy LP22 notes that the Council will prepare an SPD on Biodiversity Net Gain. Integrating an approach with the objectives set out by the Environment
DCLP/304 Mr P Edgley	The policy makes no commitment to increasing the capacity of the A46, other than improving access to it. This road is regularly at a standstill during peak commuting hours and beyond yet this housing/employment development seeks to add potentially another 4,000 plus vehicles and associated movements onto the local roads network. There are other housing developments under construction along the A46 corridor which will also add to the congestion. The A46 'expressway' which may be seen as alleviating these capacity problems to an extent is still some years in the future and there is no certainty that it will be constructed.	Agency would be advantageous. The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.
LDCLP/51 Anonymous	We cannot build forever it is unsustainable. A period of re-planning to sue built on ground better and facilities already built and start to think about the proper environmental impact of man's greed. Do you think we have missed something? The planet's problems with regards to the human greed.	Noted – the Council has an objectively set Local Housing Need figure, which outlines the number of new homes that need to be built to meet the needs of the local area.
EDCLP/65 Mr W Leek	MUST HAVE the healthcare centre here.	The Council is in dialogue with each of the CCGs to agree the practical and deliverable steps that can ensure the SUE supports the healthcare infrastructure required. Consider wording changes to Draft Policy LP36 and strengthen references to minimise impacts on healthcare services, and delivering new/improved infrastructure where required.
EDCLP/80 Historic England	Please see our previous comments in relation to the North of Birstall, Grade I Rothley Court Hotel and Chapel and listed buildings in the Town Green area were previously referenced. In particular it may be helpful to reference heritage assets and their settings within the Environment bullet points of policy LP36, reflecting the NPPF. In terms of wider setting there may be views from Bradgate Park and Old John Tower (about 4km west) and from Castle Hill Country Park where the preceptor is (about 1.5km) and therefore there may need to be consideration of how the development is buffered in views.	 Drat Policy LP36 makes specific reference to protecting the assets and setting of Rothley Conservation Area. At present, it is not deemed necessary to list specific assets, as the impact on these will be assessed as part of the planning application, and both the impacts, and any necessary mitigation will be captured in the details of the required Development Framework. Furthermore, any proposal for the North Birstall SUE, will be considered against Draft Policy LP24, which requires development proposals to protect and enhance heritage assets, including non-heritage assets, and

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		their significance.
		The Council would welcome on-going engagement with HE, both as part of the local plan-making process; and as part of the Development Management process.
EDCLP/86 Rothley Parish Council	10.2 - RPC would like to see the proposed Broadnook Health Centre included in this section and for conditions to be placed to ensure this is delivered at the earliest possible stage as a part of the Broadnook development. We note that the interim Sustainability Report Oct 2019 states under 7.11.20 the following :- <i>"At Rothley, the sites are not within walking distance of current health facilities in Rothley. Whilst a new health facility is mooted for the Birstall SUE, this has not yet been confirmed, and would still be further than an ideal walking distance. Nevertheless, the scale of growth involved ought to be possible to accommodate at existing and planned facilities (presuming contributions are secured), and there are public transport links. Access to healthcare is unlikely to be significantly worse or better, and so neutral effects are predicted."</i>	The Council has established a policy framework in the Core Strategy and the emerging local plan that will achieve the necessary infrastructure to mitigate the impacts of the NoB SUE. The Council is liaising with LCC to discuss transport and education infrastructure. The Council is liaising with the CCG to discuss healthcare infrastructure.
	RPC would like to see it confirmed that the new health facility is actually a part of the planned infrastructure of the SUE. The word "mooted" is not a commitment. Forward planning of health provision should be done in advance of the new housing proposed by this Local Plan to ensure that existing health provision is not compromised.	
	Schools: the Rothley Academy Primary School is already oversubscribed and there are as yet no agreed plans for an extension. If the proposed Broadnook development proceeds it is essential that it should have a school and that this school should be built at the earliest possible stage of the development. Such a commitment should be included in the Local Plan.	
EDCLP/108 Sue Barry	This is too big a development, again taking away greenfields, and is a potential risk of creating more flooding. Joining up with Rothley and Birstall creating an ugly URBAN SPRAWL!! Why are we building on these areas knowing that Climate Change is serious and isn't going to go away. WE need to be thinking of future generations, and how we can provide a sustainable life for them. Feel just creating more areas to flood, making everywhere too densely populated.	The preferred development strategy is an urban concentration and intensification strategy, with some growth dispersed to other areas. The notion of the SUE at Birstall was established in the Core Strategy, and the policy intention is carried forward into the draft local plan.

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	Is the idea of shops etc on this site to stop people travelling, so they shop locally and not use their cars? Can't see this happening. Rothley has had a large influx of new development and yet there is no provision for a Doctors Surgery and Schools are full can't understand planning behind this?			
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	The principle of development on this site has already been established through decisions relating to the Core Strategy. We note the reference to a whole range of different policies which are in the plan and would expect them to be followed. (Policies LP2, LP4, LP6, LP11, LP12, LP16, LP17, LP33, LP34, LP19, LP22, LP30, LP32 and LP25)	The Council is aware of the potential transport impacts associated with new developments. The Charnwood Local Plan Option Testing Report (2019) explored the implications of the growth scenarios, and the preferred development strategy. Further transport modelling work is being carried out, and the feedback		
	However the development is larger than that proposed previously. It should not be accepted without an achievable transport solution. The size, depth and location of the North Birstall Urban Extension is such that it seems highly unlikely that it will be possible to create viable public transport routes through it. Moreover, even if good public transport could be provided through the site there is nothing	and information from this response will be included in the work. The Council is preparing a Sustainable Transport Study, this response will help inform that study. Opportunities for sustainable transport measures and infrastructure will be explored, subject to an analysis of demand, cost, timescale, and delivery.		
	to show how much it might reduce traffic generation. In para 9.7, the Plan supports Midlands Connect's proposals to "improve" the A46. The TA also discusses the need to widen the Leicester Western Bypass to three lanes but it does not consider whether any of the junctions, or the roads that feed them, could accommodate the increased flow. The Plan supports the need to increase the capacity of the A6 junction and the provision of another roundabout on this route but there is no proper discussion of the other measures needed to achieve a significant reduction in car use	The Council is aware of L.City's progress with their draft local plan. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how to optimally coordinate the various development proposals across the sub-region. Joint-working arrangements will be formally confirmed through agreed Statements of Common Ground.		
	car use. With the Leicester City Plan due to come out soon, the relationship between this development and those proposed for the city also need to be reviewed before the proposals for this site are finally approved.			
EDCLP/163 Liz Hawkes Anstey Parish Council	Anstey PC is broadly supportive of the allocation policies which will see the main areas for development at the North of Birstall Sustainable Urban Extension, Regeneration at Watermead corridor. Along with increases of dwellings at Shepshed and Loughborough.	Noted – the Council welcomes the support.		
EDCLP/221 Nick Baker Lichfields on	Strategic Allocations (Q42) At the heart of CEG's representation is a serious concern that Thorpebury is not adequately supported in emerging policy. It is	The comments regarding the mechanisms for 'saving' the C/S policy is noted.		
behalf of CEG	unclear how the Council intends to 'save' the policies in the Core Strategy which relate to the SUEs (including CS19) (paragraph 4.11 refers), nor the statutory basis by which this could be	The Council considers that the policy framework is robust and will allow for the delivery of all of the SUEs and proposed regeneration areas.		

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	 achieved. There also appears to be a contradiction between this stated intention and the earlier reference (at paragraph 1.3) that the new Local Plan will replace the Core Strategy as part of the development plan. Given the crucial role of Thorpebury in meeting Charnwood's housing and employment needs throughout the CLP period (2019-2036), it is considered essential that the CLP includes a location specific strategic policy relating to the SUE which provides clear support for priority in the delivery of the SUE which provides clear support for priority in the delivery of the SUE which provides clear support for priority in the delivery of the SUE which provides clear support to enable effective delivery of the SUE. This review should include a recognition of the changing nature of retail provision, as identified in the town centres and shopping section of the DCLP. In this regard, it is particularly important that the CLP appropriately recognises the status of the approved illustrative masterplan and the approved parameter plans. The current drafting which incorporates very precise boundaries for specific land uses from the illustrative masterplan into Policies Map 1 is unnecessary and will potentially prevent appropriate design evolution and innovation as the SUE comes forward. It would be more appropriate and sufficient for the allocation on Policies Map 1 to identify the overall area, with a site specific policy to identify the elements which the Council expects to see come forward within it. CEG would welcome the opportunity to support the Council in the preparation of this policy. Only by incorporating an equivalent to CS Policy CS19 within the new CLP will there be a clear policy position within the statutory development plan to guide the assessment of future applications for planning permission and approval of details within the Thorpebury area. Whilst it is at a different stage, this would be broady consistent with the approach that has been taken for the lan	The policies map will be updated as part of preparing the next draft of the local plan. The boundaries of all proposed allocations will be reviewed and finalised as part of that process.
	that has been taken for the land North of Birstall. For clarity and to confirm CEG's ongoing interest, we have separately provided a 'SHELAA site proforma' for Thorpebury which indicates a site	

The management plan should be agreed with the Charnwood	
Ecologist and LRWT. There should be ongoing monitoring of ecological areas and species to ensure that the area delivers good habitats and for a range of species.	The Council expects that management plans will be drafted and agreed with the relevant stakeholders, including those within the Council; as well as those relevant statutory bodies.
No Comment	Noted.
We cannot support Policy LP 36 as it makes no reference to meeting the identified need generated by the development for Indoor Sport/Swim provision and Outdoor Sport Facilities. The development is required to meet the Council's standards for Open Space, Sport and Recreation provision. The management arrangements for Green Infrastructure and Community Infrastructure also requires clarity and appropriate Policy provisions.	The policy approach within Draft Policy LP36 is evidence-based. Impacts and mitigation have been calculated based on the quantum of development. Infrastructure requirements have been assessed and will be documented in the final version of the Council's IDP. The Council would welcome a discussion on the evidence that sets out the infrastructure requirement for indoor sport/swim, as generated by the specific quantum of development at North of Birstall SUE.
Extension, this site is located close to Wanlip WwTW. The site is also intersected by some major Sewerage network that will needed to be protected during construction, this should be highlighted from the outset of the design process to prevent costly layout and infrastructure adjustments. Due to the sites location, it is not anticipated that any network improvements will be required, but the impact at the WwTW would need to be reviewed, see comments with the Wastewater treatment section of the response for further	The Council welcomes the information on the sewerage network. This will be documented and passed on to the Development Management team, and the landowner/promoter/developer (as required).
10.2 - I would like to see the proposed Broadnook Health Centre included in this section and for conditions to be placed upon when this is delivered as a part of the Broadnook development. We note that the interim Substainability Report Oct 2019 states under	The policy approach within Draft Policy LP36 is evidence-based. Impacts and mitigation have been calculated based on the quantum of development. Infrastructure requirements have been assessed and will be documented in the final version of the Council's IDP.
"At Rothley, the sites are not within walking distance of current health facilities in Rothley. Whilst a new health facility is mooted for the Birstall SUE, this has not yet been confirmed, and would still be further than an ideal walking distance. Nevertheless, the scale of growth involved ought to be possible to accommodate at existing and planned facilities (presuming contributions are secured), and there are public transport links. Access to healthcare is unlikely to be significantly worse or better, and so neutral effects are predicted." I would like to see it confirmed that the new health facility is actually a part of the planned infrastructure of the SUE. The word	The need / requirement for a new health centre is being discussed with the CCG.
	range of species. No Comment We cannot support Policy LP 36 as it makes no reference to meeting the identified need generated by the development for Indoor Sport/Swim provision and Outdoor Sport Facilities. The development is required to meet the Council's standards for Open Space, Sport and Recreation provision. The management arrangements for Green Infrastructure and Community Infrastructure also requires clarity and appropriate Policy provisions. Severn Trent are aware of the Birstall Sustainable Urban Extension, this site is located close to Wanlip WwTW. The site is also intersected by some major Sewerage network that will needed to be protected during construction, this should be highlighted from the outset of the design process to prevent costly layout and infrastructure adjustments. Due to the sites location, it is not anticipated that any network improvements will be required, but the impact at the WwTW would need to be reviewed, see comments with the Wastewater treatment section of the response for further information. 10.2 - I would like to see the proposed Broadnook Health Centre included in this section and for conditions to be placed upon when this is delivered as a part of the Broadnook development. We note that the interim Substainability Report Oct 2019 states under 7.11.20 the following :- "At Rothley, the sites are not within walking distance of current health facilities in Rothley. Whilst a new health facility is mooted for the Birstall SUE, this has not yet been confirmed, and would still be further than an ideal walking distance. Nevertheless, the scale of growth involved ought to be possible to accommodate at existing and planned facilities (presuming contributions are secured), and there are public transport links. Access to healthcare is unlikely to be significantly worse or better, and so neutral effects are predicted." I would like to see it confirmed that the new health facility is

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	should be done in advance of the new housing proposed by this Local Plan to ensure that existing health provision is not compromised.	
DCLP-425-470 Environment Agency	We recommend that a new bullet point should be added to the Environment sub-section which ensures Biodiversity New Gain will be a requirement of the new development.	The fourth bullet point under the Environment sub-heading does reference biodiversity networks. However, the Council wishes to discuss with the EA how to improve and strengthen the policy wording to ensure biodiversity impacts are minimised and the SUE can achieve positive biodiversity gains. Integrating an approach with the objectives set out by Natural England would be advantageous.
EDCLP/239 Jonathan Barratt- Peacock	Road improvements, shops and GP surgery to serve this community should be built before housing. A definite commitment to these is needed in this policy. Rothley depends heavily on the major A6 and A46 roads which are already under considerable pressure, which will increase substantially if the proposed Broadnook development goes ahead. Broadnook was originally planned for 1600 houses but is now listed as 1950 which will place more strain on existing communities and road networks. 10.2 - I would like to see the proposed Broadnook Health Centre included in this section and for conditions to be placed upon when this is delivered as a part of the Broadnook development. We note that the interim Substainability Report Oct 2019 states under 7.11.20 the following :- "At Rothley, the sites are not within walking distance of current health facilities in Rothley. Whilst a new health facility is mooted for the Birstall SUE, this has not yet been confirmed, and would still be further than an ideal walking distance. Nevertheless, the scale of growth involved ought to be possible to accommodate at existing and planned facilities (presuming contributions are secured), and there are public transport links. Access to healthcare is unlikely to be significantly worse or better, and so neutral effects are predicted."	The policy approach within Draft Policy LP36 is evidence-based. Impacts and mitigation have been calculated based on the quantum of development. Infrastructure requirements have been assessed and will be documented in the final version of the Council's IDP. The need / requirement for new infrastructure is being discussed with the relevant statutory providers.

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	Without a GP surgery for this new village, it would be much worse as an additional 1950 families would be sharing already oversubscribed services.	
EDCLP/239 Vivienne Barratt- Peacock	Road improvements, shops and GP surgery to serve this community should be built before housing. A definite commitment to these is needed in this policy. Rothley depends heavily on the major A6 and A46 roads which are already under considerable pressure, which will increase substantially if the proposed Broadnook development goes ahead. Broadnook was originally planned for 1600 houses but is now listed as 1950 which will place more strain on existing communities and road networks. 10.2 - I would like to see the proposed Broadnook Health Centre included in this section and for conditions to be placed upon when this is delivered as a part of the Broadnook development. We note that the interim Substainability Report Oct 2019 states under 7.11.20 the following :- <i>"At Rothley, the sites are not within walking distance of current health facilities in Rothley. Whilst a new health facility is mooted for the Birstall SUE, this has not yet been confirmed, and would still be further than an ideal walking distance. Nevertheless, the scale of growth involved ought to be possible to accommodate at existing and planned facilities (presuming contributions are secured), and there are public transport links. Access to healthcare is unlikely to be significantly worse or better, and so neutral effects are predicted." I would like to see it confirmed that the new health facility is actually a part of the planned infrastructure of the SUE. The word "mooted" is not a commitment. Forward planning of health provision should be done in advance of the new housing proposed by this Local Plan to ensure that existing health provision is not compromised. Access to healthcare is already difficult in the area. Without a GP</i>	The policy approach within Draft Policy LP36 is evidence-based. Impacts and mitigation have been calculated based on the quantum of development. Infrastructure requirements have been assessed and will be documented in the final version of the Council's IDP. The need / requirement for new infrastructure is being discussed with the relevant statutory providers.
	surgery for this new village, it would be much worse as an additional 1950 families would be sharing already oversubscribed services.	
EDCLP/175	It is not clear as to why north of Birstall and the Watermead	Both North of Birstall SUE and Watermead Regeneration Corridor
lan Nelson	Regeneration Corridor have been singled out and that such	represent long-term development priorities. In order to give each
North West	detailed requirements are not set out for other large developments	development site continued priority status, and allow the Council's
Leicestershire	proposed in the plan, including the 2,000 dwellings at Shepshed.	objectives to be achieved, the sites have been provided with specific

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District Council	Such requirements would provide clarity and certainty.	draft local plan policies.
		The nature of the development proposals at Shepshed are slightly different; albeit the development proposals along the Black Brook corridor are subject to further policy requirements to ensure joined-up solutions to environmental impacts.
EDCLP/252	Draft Policy LP36 (North of Birstall Sustainable Urban Extension),	Noted – the Council is grateful for the clarification.
Leicestershire	refers to the Leicestershire Minerals Development Framework, but	
County Council	this has now been replaced by the Leicestershire Minerals and Waste Local Plan up to 2031 which was formally adopted on the 25 September 2019.	The policy will be amended to refer to the latest minerals and waste plan. The consideration of minerals safeguarding will take place as part of the
	September 2018.	Development Management process for the planning application.
	Regard should be given to the Mineral and Waste Safeguarding	
	Charnwood Borough Document S2/2015 which forms part of the plan and lists the areas of the borough which are safeguarded for	
	mineral purposes.	
	Several of the allocations in the Draft Charnwood Local Plan lie in sand and gravel safeguarding areas and this should be considered.	
DCLP 266	The City Council suggests that, for consistency with draft Policy	The nature of the employment provision at North of Birstall SUE is
Leicester City Council	LP37, the proposed quantum of office development be expressed as square metres' floorspace.	different to that expected in the Watermead Regeneration Corridor. As such, the policy objectives for employment land provision are different.
DCLP 266	The City Council notes that the development will include provision	Noted – the Council welcomes the opportunity to discuss and finalise the
Leicester City Council	for a primary school and that contributions will be sought to the provision of secondary school places as appropriate	infrastructure requirements for the site with LCC.
		The Council is preparing an IDP and this response will be used to inform the final document.
		Specific requirements relating to the location of the primary school site, and the scale of financial contributions will need to be agreed.
DCLP 266	Transport	Noted – Further discussion is required between the Council, LCC, and
Leicester City	The City Council considers that the following sub-bullet point in draft Policy LP26 could be strongthened to read:	the developers of both Ashton Green and North of Birstall SUE in order
Council	draft Policy LP36 could be strengthened to read: "new and improved cycling and walking routes, well related to the	to check that any changes to the policy are deliverable
	Green Infrastructure network, connecting to existing and new	
	employment areas and centres, the Birstall Park and Ride, Ashton	
DCLP 266	Green, Watermead Country Park and Charnwood Forest;". The City Council notes that draft Policy LP34 mentions that	Draft Policy I P36 requires transport improvement measures to be
Leicester City	ensuring any road improvements are supported by a robust	Draft Policy LP36 requires transport improvement measures to be determined; and makes a direct reference back to Draft Policy LP33,
Council	transport assessment, but considers that it may also be useful to	which in turn stipulates that all major development must have robust
	reiterate this in draft Policy LP36, including a Travel Plan as an	transport assessments and travel plans.

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EDCLP/52 Shepshed Town Council	item of supporting information under the section: 'We will do this by working with our public and private partners and will require the following to support a planning application: There is no mention of Shepshed or the West of Loughborough SUE in this Chapter. Only the North of Birstall SUE and Watermead Regeneration Corridor are covered. We ask that a further section be introduced outlining the plans for the West of Loughborough SUE.	The Council will review the wording of Draft Policy LP36 and consider whether the wording could be strengthened to add clarity. The West of Loughborough SUE is enshrined in the extant Core Strategy (2011 to 2028). The policy framework for delivering the WoL SUE is therefore established. The draft local plan proposes to carry forward and 'save' the policies from the Core Strategy. The mechanism to secure this is under review, and the precise nature of the new policy framework is under review.
EDCLP/270 Pegasus on behalf of Palmer- Tomkinson Trust, Cooper Family, Barwood Homes and Davidsons Homes	 Further to our recent discussions, I have set out below representations prepared on behalf of the Palmer-Tomkinson Trust, Cooper Family, Barwood Homes and Davidsons Homes in relation to the Broadnook Garden Suburb, North of Birstall (application reference number: P/16/1660/2). A hybrid planning application for the development of Broadnook Garden Suburb, north of Birstall, was first submitted and validated in August 2016. The planning application has been subsequently amended through the course of the planning application process, to now seek outline permission for a mix of uses including; 1,950 dwellings, 15ha of employment uses, a local centre, business uses, a retirement village, care home, community and leisure uses, public open space, green infrastructure and sports provision, together with detailed planning permission relating to the Phase 1 development comprising 193 dwellings, a Countryside Park, sports pitches, and associated access, drainage and landscaping infrastructure. The submitted planning application was formulated to accord with the adopted Charnwood Core Strategy. The planning application was developed in accordance with adopted Policy CS20. Through the course of the planning application process, in dialogue with officers and statutory consultees, there has been some updates to the proposals and development description, through the submission of revised documents and an Environmental Statement Addendum, which are in turn reflected through the emerging Draft Policy LP36. The applicant team is committed to the early delivery of this key strategic site, and the benefit of the hybrid application is the delivery of housing early in the plan period. The proposals include a care village which is a significant and beneficial 	Noted- the Council welcomes the support. As highlighted, the hybrid planning application is scheduled for committee on the 17 th March 2020. The Council continues to work proactively with the landowner/promoter/developer; as well as the statutory bodies, and the local community to maximise the benefits of the scheme, whilst minimising the impacts. The trajectory for the delivery of 966 dwellings is noted. Further discussion is required to confirm this trajectory, and subject to confirmation, this information will be included in both the draft local plan housing trajectory and the five-year housing land supply information.

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	element of the Broadnook scheme. An operator has been identified to deliver the care village, and the developer is committed to the delivery of the care village as part of Phase 1 of the Broadnook development. I have set out below the agreed trajectory for the delivery of the Broadnook SUE, which demonstrates the benefits of a collaborative approach to the delivery of the Broadnook Garden Suburb.									ase 1 agreed	
	[Year	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28		
		Estimated Completions	60	142	152	149	147	147	169		
	• The applicant team has been working with officers from Charnwood Borough Council to progress the planning application through to determination at the Plans Committee. It is anticipated that the planning application will be taken to an Extraordinary Plans Committee Meeting on 20 th February with an officer recommendation for approval. The planning application accords with the emerging Draft Policy LP36 and is therefore supported.								ning Commit taken to ebruary ning	o an ' with	
Do you have any o If you don't agree	Q43 - LP37 - Watermead Regeneration Corridor Do you have any comments on this draft policy? If you don't agree with the proposed policy please set out why and what alternative								e approach would you suggest?		
Do you think we h DCLP/292	Do you think we have missed something?									The Draft Local Plan supports biodiversity net gain through Draft Policy	
Natural England	Statural England welcome the requirement for a green intrastructure strategy but also suggests that opportunities for Biodiversity Net Gain should be considered at the earliest stages of development. Advise the new Defra Biodiversity metrics should be used to help limit damage to nature and to make positive enhancements for biodiversity.								versity evelopn ised to	Net nent. help	LP22 and specific references in relation to Draft Policy LP37 will be considered.
LDCLP/51 Anonymous	 All land already built on but declining needs regeneration. Constant on going building of employment facilities, then houses, then employment, then housing is unsustainable destroying the environment and planet. Long term warnings 							ent faci g is uns	ilities, tl sustaina	The Draft Local Plan recognises the importance of regeneration and seeks to ensure that the use of previously developed land is maximised. The plan promotes sustainable development; however, we also need to ensure that the needs of our community and businesses are met.	
EDCLP/143 CPRE Leicestershire and its	 are being missed. Any development or change in land-use in a catchment area has the potential to affect run-off rates. All new development or alterations, whether in the floodplain or not, must avoid increasing run-off rates and ideally should 								ll new dplain	Draft Policy LP37 recognises the importance of appropriate drainage systems and flood alleviation. Draft Policy LP32 provides wider advice on sustainable drainage seeks to ensure run-off rates are not increased.	

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Charnwood District Group	 reduce them. Concerns about developments in the area to the north of the A46 and Wanlip Village depending what is proposed. However, much of the policy setting out the criteria for approving development is appropriate. 	
EDCLP/163 Liz Hawkes Anstey Parish Council	 Broadly supportive of the allocation policies which will see the main areas for development at the North of Birstall SUE, Regeneration at Watermead corridor. Along with increases of dwellings at Shepshed and Loughborough. 	The support is welcomed.
EDCLP/225 John Clarkson Leicestershire & Rutland Wildlife Trust	Developments that contribute to the Soar and Wreake Living Landscape should be supported. LRWT have only had dialogue at stakeholder events several years ago, this should be re-established to ensure that the project contributes to the Soar and Wreake Living Landscape.	The Living Landscape is recognised as an important initiative and further dialogue is supported.
EDCLP/226 Eleanor Hood	No Comment	
EDCLP/237 P.Williams	 Policy very unbalanced focusing entirely on regeneration through development rather than on environmental measures which also need regeneration and where the opportunities, particularly through biodiversity measures which also improve flood capacity and would be of major benefit as climate change delivers increasing impact. 	Regeneration can facilitate and fund regeneration. Environmental measures are supported by the Draft Local Plan but if not funded via development they may need to be sourced.
EDCLP/192 Severn Trent Water	 Severn Trent have undertaken a high level assessment of the Watermead Regeneration Corridor. It indicates there may be need for capacity improvements, subject to the type and scale of regeneration implemented. Given the sites proximity to the Grand Union Canal and other waterbodies/courses the site should not discharge surface water to the Sewerage system, rather discharge surface water in accordance with the Drainage Hierarchy. The site is also indicated to be at risk of flooding from rivers and surface water. It is therefore important that the foul system is protected from surface water ingress. 	The potential requirement for capacity improvements is recognised. The importance of ensuring adequate drainage in urban areas is also recognised and would be further assessed during the planning application process and on-going dialogue will be maintained.
DCLP-425-470 Environment Agency	 Location of new development will need to be very carefully considered within this area due to areas of land lying within Flood Zone 3. Recommend that a bullet be added which stipulates biodiversity net gain must be demonstrated to be a part of any development proposals. 	 The importance of flood risk is recognised by the Draft Local Plan and on-going dialogue will be maintained. The Draft Local Plan supports biodiversity net gain through Draft Policy LP22 and specific references in relation to Draft Policy LP37 will be considered.
DCLP 266 Leicester City	 Suggests the following wording for the latter part of the paragraph: 	The addition will be considered.

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Council	 "Leicester City and Leicestershire County Council have identified the potential for a new pedestrian and cycle bridge to connect Watermead Country Parks North and South, however the delivery of this route and bridge is dependent on a third party landowner." 	
DCLP 266 Leicester City Council	 Welcomes the recognition that Leicester city centre is the best location for prime office development. 	The support is welcomed.
DCLP 266 Leicester City Council	 Consider it may be useful to include Transport Assessments and Travel Plans as items of supporting information under the section: 'We will do this by requiring the following in support of planning applications:'. 	Draft Policy LP33 requires all major developments to provide transport assessments and travel plans. We will consider adding specifically to this policy.
EDCLP/175 Ian Nelson North West Leicestershire District Council	 Not clear why north of Birstall and the Watermead Regeneration Corridor have been singled out with detailed requirements, but other large developments proposed in the plan are not, requirements would provide clarity and certainty. 	The other developments have outline planning permission, but additional detail will be provided in the submission plan.
EDCLP/252 Leicestershire County Council	 Site is located on the Strategic Road Network, the A46 Leicester Western Bypass and the A607 Syston Western Bypass are key routes into/ out of Leicester and connect to the wider Strategic Road Network Wider implications need to be considered, such as impacts on roads which Highways England is the highway authority. A46 around Leicester and M1 between J21a & J21 experience significant congestion, accident and journey time unreliability problems, and this would need to be reflected / considered in any transport assessment work. A607 and A46 are A-class roads with speed limits over 40mph and may be restricted by policy IN5 of the LHDG. 	Impact on the highway network is an important aspect of site selection and will be assessed through further transport modelling. This work is being jointly prepared with LCC.
Decision Making F	Process We are being asked to appraise your preferred options without any	The development strategy and proposed allocations stem from the
County Councillor Max Hunt	reference to others not preferred. I think it's reasonable and democratic to know the main sites which were not preferred. Restaurants that tell their guests only what they prefer don't tend to	evidence base, which includes the SHELAA, further site assessment work, and the Sustainability Appraisal.
	last very long. We are told that there is no shortage of landowners and developers wishing to see their land developed. So it would be good to see the main contenders and why they were not preferred, as you did in the previous Local Plan.	These documents are all available online to be viewed. Copies of documents can also be requested from the Council.
DCLP/63 Ms Suzanne	To take note of the villagers wishes as expressed through neighbourhood plans. Also take note of recent planning decisions	The draft local plan has regard to the made Neighbourhood Plans in the borough. Once adopted, this new local plan will take precedence and
INIS SUZAIIIIE		borough. Once adopted, this new local plan will take precedence and

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Collington	and not overturn them by putting things back in this plan that have been rejected. Hold public consultation events rather than put this very lengthy document online where few will fill it in as it is too complicated and did not work when saving to draft as my comments couldn't be retrieved to be submitted and I had to start all over again.	Neighbourhood Plans will need to be in conformity with the new local plan. The Council has carried out a number of consultation events, in line with the requirements set out in the Council's adopted Statement of Community Involvement.
DCLP/410 (1 of 2) Mrs Rebecca Franklin	I find the fact that you have refused many of the sites included in this plan very odd and shows a complete contempt for the residents who campaigned against mass scale development of the area. There are no services to speak of in East Goscote and yet another 220 houses are planned. Flooding is a huge issue as well which I don't believe the Council have or intend to consider properly. I feel that the housing need is around more urban areas where there are more existing services and where brownfield sites can be redeveloped.	The Council (and the local plan) must take an objective view on sites that have been proposed for allocation through the local plan-making process. All sites nominated through the "call for sites" process have been assessed through the SHELAA and additional site assessment work. The sites have also been reviewed through the Sustainability Appraisal.
Neighbourhood P	lans	
DCLP/175 Burton on the Wolds, Cotes and Prestwold Parish Council	Our Joint Neighbourhood Plan is being examined at this time. Burton on the Wolds, Cotes and Prestwold Parish Council would ask that all proposals contained within this document are taken into account.	The draft local plan has regard to the made Neighbourhood Plans in the borough. Once adopted, this new local plan will take precedence and Neighbourhood Plans will need to be in conformity with the new local plan.
		The Council has carried out a number of consultation events, in line with the requirements set out in the Council's adopted Statement of Community Involvement.
EDCLP/95 (1 of 2) Barrow Upon Soar Parish Council	The Barrow upon Soar Neighbourhood Plan was 'made' by Charnwood Borough Council in May 2018. Where a neighbourhood plan has been brought into force, in accordance with Planning Practice Guidance (Paragraph: 006 Reference ID: 61-006-20190723), the local planning authority should take it into	The draft local plan has regard to the made Neighbourhood Plans in the borough. Once adopted, this new local plan will take precedence and Neighbourhood Plans will need to be in conformity with the new local plan.
	account when preparing the Local Plan strategy and policies, and avoid duplicating the policies that are in the neighbourhood plan. Unfortunately, in the case of the Draft Charnwood Local Plan 2019- 36 there is little evidence to suggest that Charnwood Borough Council has taken account of the 'made' Barrow upon Soar Neighbourhood Plan or taken steps to avoid duplicating its policies. The Local Plan fails to make appropriate reference to Neighbourhood Plan policies and proposals.	The Council has carried out a number of consultation events, in line with the requirements set out in the Council's adopted Statement of Community Involvement.
Plan Monitoring a		
DCLP/283 Harborough District Council	General point: There is currently no reference to the need for a monitoring/review policy in the pre-submission version.	Noted – there are references to monitoring the implementation of specific policies, but it is agreed that there is no overarching explanation of how monitoring and/or a review of the plan would take place.

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CONSULTEE EDCLP/246 (1 of 4) Andrew Collis Gladman Developments Ltd	Minimal attention is given within the Draft Local Plan as to how it will be monitored and reviewed over the coming plan period. Such information is necessary in order for the Council to understand how successful policies have been in meeting and responding to the vision and objectives and requirements. This will help the Council make judgements as to when and what action to take should delivery fail to accord with this strategy. Such an approach is important for securing the effectiveness of the Local Plan post adoption. Gladman consider that the Council should insert a new policy confirming its commitment to monitoring the implementation of the plan and which sets out the overall approach that the Council will take to performance indicators. A policy by policy approach should be set out in a new Appendix to the Local Plan which sets out the requirements and targets for policies defined in the plan and measures taken where not achieved. For the delivery of employment and housing land targets, the Council should include scope for an early review of the Local Plan should monitoring show a significant shortage in appropriate land being provided. The Housing Delivery Test may provide a good starting point for determining where a review may be necessary for the purpose of housing. A requirement for a 20% buffer through the Housing Delivery Test may result in the need for a review of allocations and application with the Council taking appropriate actions to reduce the timescales for such sites to come forward. A requirement to apply the Presumption through the Housing Delivery Test may trigger the need for a Local Plan review. The Council should also consider how its ability to illustrate and maintain a five-year land supply may also require a plan review. Should a five-year supply position fall significantly, this could illustrate a problem with the adopted strategy necessitating a plan review.	This will be included in the next draft of the local plan. Noted – there are references to monitoring the implementation of specific policies, but it is agreed that there is no overarching explanation of how monitoring and/or a review of the plan would take place. This will be included in the next draft of the local plan.
DCLP/301	I would also make this comment, which is beyond the immediate	Achieving sustainable development is at the heart of the planning system

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Mr Phil Sheppard	scope of the Local Plan but is nevertheless important: I think Charnwood BC should take a general planning policy position, and make representations to government, that the current local plan and strategic planning has to change its model for the post-2036 period for many highly populated areas. Logically, there must be a limit to the amount of development (i.e. the construction of buildings and roads on previously undeveloped land) in any one area, because it would unacceptably impact on non-economic aspects of life - environment, mental, physical and spiritual well-being. When that point is reached, economic development must be by means of productivity increases in existing economic activities, and/or new value-creating activities within the same developed area. I would like to see the Council debating this issue and developing a position, in liaison with other authorities within the LGA.	 and is central to the objectives of the draft local plan. Both now, and in the future, a careful balance must be struck between the requirement for new development, in new locations, to meet the defined needs of the local area; versus the ability for existing uses, on previously developed land to be able to meet those needs. It is unlikely, in the short to medium term, that the needs in the borough will be able to be met entirely by previously developed land.
Limits to Develop		
LDCLP/03 T Howlett	Re; Plan Review, red line map alteration for Developable Area, Brick Kiln Lane, Shepshed.	The limits of development have been defined via the Settlement Limits to Development Assessment (2018).
	I am in possession of a plan (attached) showing the proposed alteration of the red line boundary indicating alterations to the Developable Area at Brick Kiln Lane, Shepshed. I note that the line	However, the boundary lines will be reviewed to make sure there are no unintended errors.
	 now excludes a portion of my domestic curtilage (see the area outlined and hatched green on the attached map) I am objecting to the exclusion of this land from the Developable Area for the following reasons; 1) My own dwelling and most of its curtilage is within the red line, thus within the Developable Area. I do not understand why, it is that this portion excluded? 2) The land now outside the red line is in fact built upon and has been for some considerable years. There is a car showroom Planning Permission 94/1911/2, associated garages and outbuildings and a hard surface over most of the immediate area. There is also a substantial block of stables and tack rooms. Planning Permission P/03/0060/2. Clearly the land has already received Built Development. 3) A parcel of land immediately adjacent to my land (outlined and hatched orange) is already the subject of residential development, currently underway, and included within the developable area. It would seem illogical that my land, hatched green, should be excluded. It is by definition not "in the open countryside" and has already been developed by virtue of the buildings thereon. 	This will be done prior to publishing the next draft of the local plan.

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	I propose that the land hatched green on the attached plan be included within the red line Developable Area. I trust my comments will be noted and put forward for consideration within the current Plan Review.	
Sustainability Ap	praisal	
EDCLP/14 Lyn Armitage	 B) Charnwood Local Plan - Sustainability Appraisal: Spatial Strategy Second Interim SA Report October 2019 Table 6.7: Summary of housing site options assessment (Sileby and Cossington) Page 49 The categorisation of the different elements in the table are factually flawed- Flood risk is substantial - the site identified for housing was recently flooded and the small brook at the side was overwhelmed. Significant wash from the field flooded the main road and rendered the road impassable. If this site is turned into a housing estate, there will be increased flooding as there will be hard surfaces, and the ability of the ground to absorb rainwater will be reduced Primary School The Primary School does not have the capacity to provide places for an additional 18 children if 70 houses are built. The School OFSTED report in 2018 stated that the school has capacity for 105 pupils, and the roll was 104. Transport The road network from the site into the village is through narrow minor roads, and raises significant safety issues Convenience store Cossington does not have a convenience store The summary states that - "Access to some services and facilities is not ideal, but this reflects Cossington's place in the settlement hierarchy". This is a circular and self-fulfilling argument - the authors of the plan justify the development of Cossington by referencing their earlier erroneous categorisation of Cossington in the settlement hierarchy as "other settlements" instead of "small village or Hamlet" 	Noted – the assessment of flood risk, education capacity, and transport infrastructure stem from the Council's wider evidence base, including the SHELAA and site assessment work. The categorisation of the sites does not come directly from the SA report. Nevertheless, the comments in this response will be used to sense-check the assessment of the sites in Cossington. The Council is aware of the impact that new development can have on infrastructure. Discussions are ongoing with the Environment Agency (flood risk), and Leicestershire County Council (education and transport) to fully understand the potential impacts on infrastructure and to confirm what mitigation (if any) can overcome these impacts.

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EDCLP/55 Sileby Parish Council	As a general comment, Sileby Parish Council notes that the draft CLP states that the Sustainability Appraisal (SA) has been a significant influence on the preferred spatial strategy and selection of sites although the consultation and its accompanying response form neither	The SA forms part of the evidence base and overall body of work that accompanies the preparation of a local plan.
Council	invites, nor enables comments to be made upon the SA itself. This seems to be a major omission and contrary to the guidance set out in the Government's guidance to SA and	The SA is available online and copies can be requested from the Council.
	Strategic Environmental Assessment (SEA) which might affect the legal compliance of the Plan.	Comments can be made on the SA, and a number of comments have been received.
		The Planning and Compulsory Purchase Act (2004) and the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the form and content of development plan documents, and also specify the various stages that the local plan must pass through in order to be legally compliant.
		The draft local plan is only at Regulation 18 stage, and so the SA report which accompanies it is not the 'formal' SA Report which is legally required.
		The formal SA Report will be prepared at the next stage of local plan- making, and will accompany the consultation exercise undertaken as part of Regulation 19.
EDCLP/246 (2 of 4) Andrew Collis Gladman	In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal. Incorporating the requirements of the Environmental Assessments of Plans and	Noted – the Council considers that the process followed thus far is transparent, reasonable, and supported by a relevant, robust and proportionate evidence base.
Developments Ltd	Programmes Regulations 2004, the SA is a systematic process that should be undertaken at each stage of a plan's preparation; assessing the effects of a local plans proposals on sustainable development objectives when judged against reasonable alternatives.	The local plan is currently at Regulation 18 stage (of the Town and Country Planning (Local Planning) (England) Regulations 2012). As such, the accompanying SA report does not constitute the formal SA Report necessary to accompany development plan documents. This will be prepared and consulted upon at Regulation 19 stage.
	The Council should ensure that the results of the SA process conducted through the preparation of the Local Plan clearly justify the policy choice made, including proposed site allocations (or decisions not to allocate sites) when considered against reasonable	However, that being said, the Second Interim SA Report is a comprehensive audit of the decision-making processes that have been followed so far.
	alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected.	The Council notes the critique of the site assessment work and the SA. The Council will be carrying out further site assessment work to inform the next draft of the local plan. The content of this response will be an input into this next stage of work.
	The SA must demonstrate that a comprehensive testing of options has been undertaken and that it provides evidence and reasoning 1147	

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CONSULTEE	as to why any reasonable alternatives have not been pursued. A failure to adequately give reasons in the SA could lead to a challenge of the Council's position through the examination process. The SA should inform plan making. Whilst exercising planning judgement on the results of the SA in the Local Plan is expected, the SA should still clearly assess any reasonable alternatives and clearly articulate the results of any such assessment.	
	The Draft version of the Local Plan is supported by an interim SA. The Interim SA examines, and contrasts proposed policy requirements and strategies against defined reasonable alternatives in order to confirm that the strategy outlined represents an appropriate strategy. This includes proposed site allocations.	
	 In its current form Gladman holds a number of concerns with the approach of the interim SA, and considers that these should be addressed in due course: The SA appraises only two supply-based options (the high and low growth scenarios). The high growth scenario represents a near doubling of supply when contrasted to the low growth scenario. A supply position midway between these cannot therefore be fairly represented by either tested option. A midway supply scenario maybe reasonably formed by the accommodation of a proportion of the unmet housing needs of Leicester (defined at around 7,500 dwellings) further to the 	
	 request of the City Council. To understand the impacts of doing so, Gladman consider that a third mid-point supply scenario should be tested through the SA. The assessment of potential spatial strategies for growth to be accommodated through the Local Plan has not adequately considered the Strategic Growth Plan. The Strategic Growth Plan is only considered in the context that its requirements for 2011 to 2031 align more closely to the low growth option. The SA however ignores that the Strategic Growth Plan sets out a spatial strategy to 2050 and as a result a spatial strategy which could deliver growth in response to this extended period in the longer term is not likely to have been fairly assessed, despite evident benefits of responding to this strategy. 	
	 The assessment made for specific sites benefits from little explanation which would benefit the transparency and robustness of the assessment made. Gladman recommend 	

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	 that site by site commentary of the assessment undertaken is provided in order to minimise the potential for later disagreement and delay. It would seem apparent that the SA has not considered the full evidence which is available in reporting site specific findings. All of Gladman's land interests identified as draft allocations within the Local Plan have been subject to recent planning applications and as such are supported by detailed site-specific evidence. Ultimately the proposals at East Goscote and Sileby were dismissed through the appeals process on grounds of principle only, and no technical concerns with any of the sites have been identified. It is therefore concerning to note that the assessment made through the SA finds negative effects for wider planning issues such as landscape and water pollution despite the recent conclusions made through the SA should be updated to reflect the wider available evidence base available for these sites to ultimately show no adverse effect in any sustainability objective. 	
Support for Other		
EDCLP/52 (2 of 2) Shepshed Town Council	Shepshed Town Council, wishes to support the content of the response submitted by Mrs Lynda Needham (EDCLP/39).	Noted. All comments will be reviewed, and a response given.
Evidence base		
EDCLP/80 Historic England	The evidence base is insufficient, contrary to the NPPF, in particular paragraphs 31 and 35. Paragraph 31 states that "the preparation and review of all policies should be underpinned by relevant and up-to-date evidence." Heritage is not included on the evidence base webpages. It may be that much of the evidence is available elsewhere, if available, it should be included within the evidence base webpage and additional work may be needed to ensure a comprehensive evidence base is provided. Site allocation site assessments should be clearly referenced. The evidence base is critical to the preparation of a Local Plan in accordance the NPPF and it is considered that the current evidence base should be significantly strengthened to ensure a sound plan. Particularly relevant to site allocations and designations could include the following:-	The Council considers that the evidence relating to the historic environment is robust. Furthermore, the assessment of impacts on the historic environment, shown within the individual site appraisals, is up-to-date and comprehensive. The Council's heritage, landscape, and ecology professionals have carried out bespoke assessments of impacts, and these are recorded in individual site proformas. This documentation is readily available as part of the Council's evidence base. The Council would welcome further discussion with HE to review the evidence base and to consider the site assessment work in more detail.

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	 Updating conservation area appraisals Undertaking characterisation studies Producing setting studies / heritage impact assessments – of specific settlements, or specific heritage assets Local lists Assessments of landscape sensitivity Heritage at Risk 	
Operation of East		
EDCLP/26 East Midlands Airport	 East Midlands Airport is an officially safeguarded under the requirements of ODPM Circular 1/2003. The objective of this Circular is to protect the safe operation of the airport and its surrounding airspace from developments that may compromise aircraft and passenger safety. The safeguarded area is shown on the safeguarding map that is issued to local authorities and this defines the areas and the types of development for which the Airport is a statutory consultee. Consultation with the Airport is required for development proposals that are; a) buildings, structures, erections and works that exceed the heights specified on the safeguarding map; b) any proposed development that may have the potential to interfere with the operation of navigational aids, radio aids and telecommunication systems; c) lighting or large-scale solar arrays that may have the potential to distract pilots particularly in the immediate vicinity and beneath aircraft departure and arrival routes; d) proposals for any aviation use within 13km of the Airport; e) any proposals within a 13km circle centred on East Midlands Airport that has the potential to attract large numbers of birds – such proposals include significant areas of landscaping or tree planting, minerals extraction or quarrying, waste disposal or management, reservoirs or significant waterbodies, land restoration schemes, sewage works, nature reserves or bird sanctuaries; f) any proposals for any wind turbines within a 30km circle that is centred on East Midlands Airport. Much of Charnwood is within the Airport safeguarded area, and some of the particularly sensitive areas include parts of Charnwood Forest. It is therefore important that the aerodrome safeguarding requirements for East Midlands Airport are included as a Local Plan policy. The wording of this policy could 	The Council appreciates the information provided by EMA. The Council would welcome the opportunity to meet with EMA and discuss potential amendments to the draft local plan. The Council is aware of the policy framework established by NW Leicestershire, but is also conscious of the different context and circumstances that exist in Charnwood. Should there be evidence to support a policy change, then this can be an input into the next version of the draft local plan.

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	the Policy Map, new development which would adversely affect the operational integrity of East Midlands Airport, aircraft operations or radar and navigation systems will not be permitted.' This would be consistent with similar policies applied by North West Leicestershire and South Derbyshire District Councils.	
Backland Develop	ment and Extensions	
EDCLP/77 Nanpantan Ward Residents' Group	The Nanpantan Ward Residents' Group (NWRG) brings together residents from the whole of Nanpantan Ward, from Epinal Way, along Forest Road and Nanpantan Road to Nanpantan Village. We would like to see additional safeguards built into the CBC Local Plan to 2036; these are required to protect the amenity and quality of [family] life of residents, especially long-term residents of Nanpantan Ward. Of course they could be applicable to other wards. A particular concern is that building in the gardens of existing rental/HMO properties renders these less desirable for future owner occupation. Safeguards Against Infilling. 1. No additional dwelling shall be constructed in any part of the garden/curtilage of an existing property. 2. No existing property shall be subdivided so as to form additional sites for development. 3. No existing property shall be demolished or part demolished so as to provide access to any new development. 4. No access to any new development shall be constructed in any part of the garden/curtilage of an existing property Additional Safeguards in Respect of Extensions/New builds 1. All works shall be completed within 12 months of starting work on site 2. Work on site shall NOT be carried out during the following periods a. Public Holidays	Noted – the proposals set out are beyond the scope of the draft local plan. Indeed, many of the proposals would require detailed conditions to be attached to planning permissions and/or are likely to be unenforceable. That being said, amenity, tranquillity and securing a good quality of life are fundamental aspects of the Council's objectives to improve the borough and enhance the profile of Charnwood. The issues raised in this response will inform the next draft of the local plan, and will also be an input to other corporate-level work within the Council.
	 b. Weekdays before 08:00 or after 18:00 c. Saturdays before 09:00 or after 17:00 d. Sundays Before 10:00 or after 16:00 	
Air Quality		
EDCLP/88 Loughborough Air Quality Protection	I believe there should be a strong reference to AQM in the Chapter 7?? of the Local Plan; given the potential impact (especially on the University) of emissions from the Biffa Incinerator and Charnwood's plan for a scheme to install AQM equipment to measure the levels	Draft Policy LP30 seeks to ensure that new development protects environmental resources including local air quality. However, there may be additional opportunities to raise the issue of air
Group	plan for a scheme to install AQM equipment to measure the levels 1151	ו הסייביבו, וופוב וומץ שב מטונוטוומו סףטרנטווונובא נט ומואב נווב ואטער טו מו

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	of PM2.5 particulates.	quality management in the draft local plan.
		This consultation response will be used to inform the next draft, where considerations of air quality and air quality management will be explored.
EDCLP/52 (1 of 2) Shepshed Town Council	There is very little attention to the problem of air quality in the Local Plan. Parts of Shepshed have some of the worst air quality readings in Charnwood, and with the huge increase in emissions from the proposed incinerator and expansion of the A512, this will only get worse. This will also affect Loughborough University. Would you please include in the Local Plan measures to greatly	Draft Policy LP30 seeks to ensure that new development protects environmental resources including local air quality. However, there may be additional opportunities to raise the issue of air quality management in the draft local plan.
	increase measurement of air quality and a strategy to improve the environment around Shepshed and the University?	This consultation response will be used to inform the next draft, where considerations of air quality and air quality management will be explored.
Strategic Policies		
EDCLP/95 Barrow Upon Soar Parish Council	Contrary to NPPF paragraph 21, the Draft Charnwood Local Plan 2019-36 does not make explicit which policies are strategic policies. The identification of strategic policies will help clarify those detailed matters that are more appropriately dealt with through neighbourhood plans. Paragraph 65 of the NPPF also requires the strategic policies of the Local Plan to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The Draft Charnwood Local Plan 2019-36 does not set out a housing requirement for the designated Barrow upon Soar Neighbourhood Area.	The draft local plan includes both strategic and non-strategic policies, as per the requirements of the NPPF. However, the referencing and signposting of these strategic policies could be made clearer.
Glossary		
EDCLP/143 CPRE Leicestershire and its Charnwood District Group	 Glossary: 9) Edge of Centre: There is reference to "a public transport interchange". This is not defined. 10) Sustainable Urban Extension: No details are provided to show how such an Extension will be judged to be "sustainable". 	Noted – an additional glossary item will be added to explain the term public transport interchange. The definition of sustainable is well established. The modern definition was coined by the Brundtland Commission Report (1987) in which it notes that the three main pillars of sustainable development include:
		economic growth, environmental protection, and social equality.
Canals – General		Noted Droft Delieu I D04, Droft Delieu I D00, Droft Delieu I D00,
EDCLP/200 Ian Dickinson Canal &	The Trust owns and operates the Grand Union Canal/River Soar Navigation where it passes through Charnwood Borough, totalling approximately 25km of canal and towpath.	Noted – Draft Policy LP21, Draft Policy LP22, Draft Policy LP33 are all of relevance to the future of the Grand Union Canal and River Soar.
River Trust	The canal network forms an important part of the industrial heritage	The Council welcomes the opportunity to liaise with the Canal & River Trust to ensure that the policy framework maximise the benefits of these

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	of the area, and is a multi-functional resource which can act in a range of roles. Canals can help to stimulate regional, sub-regional and local economies and can be used successfully as tools in improving community wellbeing and urban and rural housing offers; in attracting and generating investment; in place-making and place- shaping; and in delivering wider public benefit. The canal provides an attraction that also contributes to the local tourist and visitor economy. Canal towpaths offer a sustainable, traffic-free route for walkers and cyclists, both for commuting and for leisure and recreation and thus contribute towards reducing reliance on private motor cars to access services and facilities and also encouraging healthier lifestyles and improving the overall health and wellbeing of local communities. The Trust hopes that these comments will be of assistance to you. Please feel free to contact me direct should you wish to discuss any of our comments in more detail.	unique assets.
Duty to Cooperate EDCLP/246 (3 of 4) Andrew Collis Gladman Developments Ltd	It is evident that the Council has held an active role in cross- boundary planning matters in preparing the Local Plan to its current form. This is illustrated through the commissioning of joint housing and employment evidence as set out within the HEDNA, and with the preparation and adoption of the Leicestershire Strategic Growth Plan. The Council is also a member of the Leicestershire LEP. The Duty however continues beyond the adoption of the Local Plan and evolves over time. The Council will need to show how this cooperation will continue post adoption, with effective mechanisms in place to address emerging cross-boundary issues. The Duty is also not only a requirement to consult, there needs to be effective cooperation. Two areas where the Draft Local Plan is weak at present relates to unmet housing need and the Leicestershire Strategic Growth Plan. Firstly, in relation to unmet housing need, it is understood that the Council do not propose to respond to any of the declared unmet housing needs arising from Leicester through this Local Plan. It is however not clear what level of engagement there has been at a sub-regional level about this approach and whether this is supported by the wider Leicestershire Districts and the City Council. This represents a gap in the Duty to Cooperate given the effects this decision potentially has for planning in wider Districts,	The Council is aware of L.City's unmet housing figure. The Council will be analysing the detail which sits behind the headline figure to ensure that there is a full understanding of the unmet need. Ongoing discussions (with L.City and other strategic policy-making authorities across the HMA) as part of the Duty to Co-operate will establish how the unmet need is address. Decisions on how to effectively plan for unmet need will be taken at the appropriate time, and formally confirmed through agreed Statements of Common Ground. The Council supports the Leicester and Leicestershire Strategic Growth Plan, and the draft local plan responds to the aims and objectives of the SGP. Significant cross-boundary working is taking place, and the Council is meeting its obligations under the Duty to Co-Operate. Statements of Common Ground will be submitted to the Secretary of State for consideration at Independent Examination. The Council acknowledges the submission of Land at Six Hills. This site will be assessed and included in the SHELAA.

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	the likelihood this need will be met in full, and potential effects on affordability within the Borough and beyond.	
	Secondly, despite underpinning spatial planning across Leicestershire from 2031, minimal attention is given within the Local Plan to the Leicestershire Strategic Growth Plan (the Strategic Growth Plan) and how it might influence long term growth and development needs. Gladman consider this to be a significant oversight of the Local Plan as drafted, harming its longevity and capacity to effectively respond to cross boundary planning issues. The Draft Local Plan should be reviewed in this regard, with particular focus given towards longer term opportunities to respond to the requirements and opportunities of the Strategic Growth Plan. This issue is considered in greater detail in Section 5.2 of this representation (Q4).	
	At present there is little information provided in the Local Plan and documents which sets out how the Council has engaged the Duty. This is a potentially significant issue for the Local Plan given the associated legal and soundness requirements connected to the Duty and will need to be addressed ahead of the Regulation 19 consultation. Gladman suggest that the Council seek to prepare a Statement of Common Ground with its neighboring authorities and statutory providers which confirms how strategic matters have been dealt with through the preparation of the Local Plan. This should address unmet housing need and the Strategic Growth Plan in response to the issues raised above.	
	Included within [our] recommendations is the need for the Council to identify broad locations for growth through the Local Plan to be the subject of an immediate focused review. Gladman consider that this is necessary to ensure that the Local Plan is responsive to the long-term development needs/strategy as confirmed through the Leicestershire Strategic Growth Plan and to respond to the Duty to Cooperate for cross boundary strategic planning in Leicestershire. Gladman has suggested, in response that land interests at Six Hills located in the north east of the Borough should be one of these broad locations for growth.	
Presumption in fa	vour of Sustainable Development	
EDCLP/246 (1 of 4) Andrew Collis	A notable omission from the draft Local Plan is a policy/wording confirming the Council's commitment to implementing the presumption in favour of sustainable development as cited in	The draft local plan is written in accordance with the NPPF and PPG. The Council is satisfied that the requirements of Paragraph 10 & 11 are met.

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Gladman Developments Ltd	Paragraph 11 of the NPPF. This is despite confirmation at Paragraph 10 of the NPPF that the Presumption is at the heart of the NPPF. The conformity of plan making and decision taking to the presumption therefore represents a key requirement of national planning policy, and as such needs to be reflected within the Local Plan in order to meet the tests of soundness.	
Consultation Proc		
DCLP/410 (2 of 2) Mrs Rebecca	The fact that this 'consultation' has not been widely publicised and the fact it is not a simple, short process to leave comments will inevitably mean there are only some comments left despite the the upped of regidents in Charpwood who do not want to see more	Noted – the consultation has been carried out in accordance with the Council's Statement of Community Involvement.
Franklin	thousands of residents in Charnwood who do not want to see more wide scale development.	There will be further opportunities to review the local plan and comment on the content when the document is published for consultation at the Regulation 19 stage.
EDCLP/17 Roger Collier	I feel that this "consultation" is designed to reduce the number of responses due to : There are 2 documents to read/understand totalling over 260 pages The closing date is December 16th only about 4 weeks away from the Shepshed presentation. The response amounts to 19 pages (word document) which unless	Noted – the consultation has been carried out in accordance with the Council's Statement of Community Involvement. A series of consultation events were held, in order to engage as many members of the public as possible.
	printing documents would need 2 screens to view and respond. I attended the Shepshed presentation in the Town Council Offices on Thursday 14th: It was held in a very cramped space with very little additional information except for an enlarged map with some more detail. Your representative didn't seem to have a lot of local knowledge.	There will be further opportunities to review the local plan and comment on the content when the document is published for consultation at the Regulation 19 stage.
EDCLP/242 Corey Taylor	Many weeks ago I registered to comment on the Draft Charnwood Local Plan, spent quite a while commenting on sections, saved everything and when I finished I couldn't see any of my comments, I assumed that this was because they were pending approval for display, but as yet they are still not showing. I have heard of many people experiencing similar issues from the Keep East Goscote Green Facebook group, with many people trying numerous times to decipher the very difficult to navigate comments system! So	The Council notes the criticism of the process for providing feedback on the draft local plan. The system that has been put in place to allow people to comment on the draft local plan is set out in the Statement of Community Involvement, which has been formally approved by the Council. The timescales for responding to the consultation are defined by the
	considering today is the final day of consultation I have decided to email over my issues with the housing elements detailed within the plan.	Town and Country Planning (Local Planning) (England) Regulations 2012).
	I would also like to state again, that many others have been thwarted in making comments by the ridiculously complex comments system. I feel that you should extend the deadline for comments and just print an email link or an address that people could comment on, as I think you would find that countless	There will be further opportunities to review the local plan and comment on the content when the document is published for consultation at the Regulation 19 stage.

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	residents want to object again, as they have done by post or on the planning portal previously regarding this planned development. I am not a conspiracy theorist in any way shape or form, but I do find it odd that the borough council has made objecting via comments on the website nigh on impossible!!!	
EDCLP/228 Haddon Way Residents Association	We would like to pass comment that the 6 week consultation that coincided with the general election. We hope that the council got plenty of responses, but in the run up to Christmas and many people involved in the delivery of a General Election we wonder how effective CBC was at getting the message out about responding to this important document	The timescales for responding to the consultation are defined by the Town and Country Planning (Local Planning) (England) Regulations 2012). There will be further opportunities to review the local plan and comment on the content when the document is published for consultation at the Regulation 19 stage.
Minerals		
EDCLP/186 David Jarvis Associates obo Tarmac	 Having reviewed the draft Local Plan with a particular focus on potential development allocations and policies relevant to the operation of Mountsorrel Quarry, Tarmac are satisfied that there are no aspects of the Plan which might directly conflict with current or future operations. In this regard, Tarmac does not wish to make any direct response to emerging policies or site allocations promoted by the draft Plan. Charnwood Borough Council has, on a number of occasions, resisted proposals that carry the potential to encroach on, or conflict with, site operations or threaten the sterilisation of mineral resources, for example in terms of housing development. This recognition is also evident in the emerging plan, particularly in respect to the draft Proposals Map. The purpose of this representation is therefore to reiterate the strategic importance of the operation at Mountsorrel Quarry and request that the authority continues to work closely with Leicestershire County Council, as Mineral Planning Authority, in safeguarding the site and the operation of the quarry, both in emerging policy and decision making terms, from incompatible development proposals. 	Noted – the Council would welcome the opportunity to liaise with Tarmac to ensure that the Quarry's operations are not unduly affected by any development proposals.
Various – Shelth		
EDCLP/161 Councillors Gill Bolton and Alice	We understand that there has been a recent move for Charnwood Borough Council not to adopt land after building is completed (for example The Chimes and Trinity Gardens). This places an additional burden on bougebuyers to not only pay their mortgage	The Council does not 'adopt' land, and it is unclear as to the precise issue that is of concern.
Brennan Shelthorpe Ward	additional burden on housebuyers to not only pay their mortgage but also management charges for the upkeep of the land around their properties.	On completion of certain developments, the promoter / developer may pass on the management of open spaces to a separate management company. Elsewhere, the adoption of roads and highways is a matter for

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	We would prefer there to be no further building in Shelthorpe Ward due to the number of new properties that have been built over the last decade and the disruption that this has caused to peoples lives. In addition, on Grange Park, the promised facilities were not provided. The residents have worked tirelessly over the last eight years to raise the funds for a new community centre – coincidentally the formal opening ceremony took place yesterday (15th December). However, we accept that there will be further development in the ward and would ask that the points made above are taken into consideration when making decisions. In addition we would like to raise the issue of the derelict farmhouse on Newstead Way. If developed this would provide housing for a number of families and would make the area safer and more appealing. At the moment this building is a complete eyesore and is becoming increasingly more dangerous as time passes.	Leicestershire County Council as Highway Authority. In terms of bringing derelict land back into use – the policy framework in the draft local plan facilitates and supports such proposals.
National Forest DCLP/260 National Forest Philip Metcalfe	Given the overlap of the timescales for production of the Local Plan and the NFC's 25 Year Vision, we consider that the best approach would be to meet to discuss further how the two documents can work together. In addition, some more specific comments have been provided above seeking changes to the particularly relevant policies and to ensure growth also leads to the growth of natural capital.	Noted – the Council would welcome the opportunity to liaise with the National Forest and agree how to optimise the policy framework in the draft local plan to maximise the benefits of the natural asset.
Approach to Carb EDCLP/272 Centre for Sustainable Energy via Cllr Needham	The Planning and compulsory Purchase Act (section 19) and the NPPF (Paragraph 148) require Local Plans to carbon audited, and to achieve radical carbon emission reductions in line with the Climate Change Act (upgraded to a -100% requirement by 2050). Paragraphs 1 and 7 of the online Planning Practice Guidance (PPG) resource, published by the Ministry of Housing, Communities and Local Government provides further detailed interpretation of the NPPF requirements. The details are summarised in a legal briefing from TCPA and client Earth and have been raised in a letter to you from client earth.	The Council acknowledges the helpful, detailed, and pragmatic response. There are a number of aspects that require further examination, and the Council would welcome the opportunity to engage more closely with the Centre for Sustainable Energy. The Council has made responding to the challenge of climate change a corporate priority. As noted in Paragraph 3.5 of the draft local plan, climate change is a cross-cutting issue that influences all of the draft local plan's objectives and policies.
	We agree with the analysis from Client Earth and the Town and Country Planning Association that Local Plans are required to	As such, where there are opportunities to refine, strengthen, and add to

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	demonstrate how their policies are in line with the legally binding carbon emission reduction targets in the Climate Change Act. Local Plans are to:	the policy framework, the Council is open to discussing practical proposals.
	 Take into account baseline emissions Robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios Adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050. 	It should be noted, that the policies included in a local plan must be deliverable; and must not be written in such a manner as to jeopardise the viability and deliverability of future development. This reinforces the point that any proposed alterations to policy wording must be evidence- based, justified and deliverable.
	With the Climate Change Act, a 100% reduction by 2050. Whilst the plan mentions carbon emissions and the sustainability appraisal discusses the impact of different policies on carbon emissions, the plan does not comply with these requirements and we agree with the view of ClientEarth that it is not legally sound in terms of its climate change mitigation policies. The evidence base should provide an overall carbon budget for the district to 2050, consistent with the updated Climate Change Act. It should show baseline emissions and the impact of development and mitigating policies on this emission curve. The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal. To the extent possible, all new development should be zero carbon given that the country's net zero target must be met in the next 30 years. A major review of the plan is required in order to bring it into compliance with legislative and policy requirements around climate change. Where local authorities have followed the process of carbon auditing their plans set out in the NPPF and Planning Practice Guidance, the conclusions are often that it would be very difficult to	The commentary on the SA is noted. The SA includes a series of objectives, which are used to appraise the options and alternatives that have been considered whilst drafting the local plan. The Second Interim SA Report sets out 14 objectives, with objective seven relating to climate change. This objective does consider matters relating to reducing greenhouse gas emissions; but does not specifically explore notions of a carbon budget. The Council will use this response as an input into the next version of the SA report, and also the next draft of the local plan.
	achieve the required carbon reduction trajectory without new development being developed to a zero-carbon standard, due to the additional emissions growth inherent in new development commitments. Thus, following the process set out in legislation, planning policy and guidance to the letter will support the need for very ambitious planning policies around building performance. Such an approach also provides evidence to support proactive and supportive renewable energy policies as essential rather than nice to have.	

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	REPRESENTATION SUMMARYEvidence base - carbon baselines and budgetsThe Tyndall Institute provides a free tool to provide a science- based carbon budget by local authority area, based on the ParisClimate Accord commitments:https://carbonbudget.manchester.ac.uk/reports/Some authorities have used the SCATTER tool (Setting City Area Targets and Trajectories for Emission Reduction) which support local authorities and city regions to standardise their greenhouse 	OFFICER RESPONSE
	bringing forward development which is consistent with and moves very quickly towards a zero carbon world, with radical changes set	
	in motion well within the lifetime of your plan. The gradualist approach set out in the plan is not equal to the scale and rate of	
	change required. The challenge to entirely decarbonise our society	

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	also demands that all other policies be tested against this objective.	
	Sustainability Appraisal We have reviewed your Sustainability Appraisal, which considers the suggested locational strategy. We agree with the overall approach taken, to direct the majority of new development to the largest and most accessible settlements, with small villages and other settlements only receiving quite modest allocations. As set out above, the legislation and guidance requires Local Planning Authorities to set out specific carbon budgets they're aiming to stay within and target trajectories. Given this requirement, CSE and TCPA consider that Sustainability Appraisals should be made more robust in their consideration of the impact of key policies on carbon emissions. Particularly in rural areas, local plans should explore whether the carbon impacts of key choices for the distribution of housing growth can be quantified and go beyond the qualitative assessment of different approaches commonly found in Sustainability Appraisals, to include a quantitative assessment of the impact of different options for distributing development on emission curves.	
	The online Planning Practice Guidance (PPG) resource, published by the Ministry of Housing, Communities and Local Government (MHCLG) provides the following further interpretation of the NPPF in respect of the need to carbon audit local plans (paragraph 7): "Every area will have different challenges and opportunities for reducing carbon emissions from new development such as homes, businesses, energy, transport and agricultural related development. Robust evaluation of future emissions will require consideration of different emission sources, likely trends taking into account requirements set in national legislation, and a range of development scenarios.	
	Information on carbon emissions at local authority level has been published by the government for 2005 onwards, and can be drawn on to inform emission reduction options." [emphasis added] The methodology for undertaking this is not yet clear, but the approach should demonstrate that of all the viable alternatives (in light of other policy requirements) the LPA has selected the option with the lowest emissions impact.	

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Plan Period		
EDCLP/175 Ian Nelson North West Leicestershire District Council	The plan period 2019-36 is noted. Consideration should be given as to whether a longer period may be required when having regard to the NPPF requirements that plans look ahead 15 years from adoption.	Noted – the current timetable for adopting the local plan means that it would look ahead 15 years.
Confirmation of N	o Comment by Public Bodies	
EDCLP/01 Bristol Water	No comments	Noted
EDCLP/02 Anglian Water Services Limited	No comments	Noted
DCLP/183 Quorndon Parish Council	General note! The Quorndon Parish Council (QPC) agrees and supports the policies unless a comment is provided.	Noted – support, where give, is welcomed.
EDCLP/16 Nottinghamshire County Council (Policy)	Thank you for consulting the NCC policy team on the Draft Charnwood Local Plan. At this time, the County Council does not have any strategic policy comments to make.	Noted,
EDCLP/37 National Grid	We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.	Noted.
EDCLP/251 Jamie Carr Oadby & Wigston Borough Council	Having had a look through the above named document, we do not have any specific comments to make at this moment in time.	Noted.

APPENDIX – LIST OF CONSULTEES INVITED TO COMMENT

Action Deafness
Action for Hearing Loss
—
Adlington
Advance Housing and Support Ltd
Affiniti Integrated Solutions Limited
Affinity Water Limited
Age UK Leicester Shire and Rutland
Airband Community Internet Limited
Airwave Solutions Limited
Andrew Granger & Co LLP
Andrew Hiorns Town Planning
Anglian Water
Anstey Martin High School
Anstey The Latimer Primary School
Anstey Woolden Hill Community Primary
School
AQ Ltd
Arcus Consulting Services Ltd
Arqiva Communications Ltd
Arriva Midlands
Arriva plc
Arts Council England (East Midlands Arts)
Ashby Road Estates Community
Association
AT&T Global Network Services (UK) B.V.
Atlas Communications NI Ltd
Aylesbury Vale Broadband Ltd
Bangladesh Social Association
Bardon Parish Meeting
Barkby & Barkby Thorpe Action Group
Barkby The Pochin School
Barratts
Barrow Hall Orchard C.E. Primary School
Barrow Humphrey Perkins School
Barrow Upon Soar Community
Association
Barrow upon Soar Neighbourhood Plan
Group
Barrow Voice
Belton Parish Council
Bepschools
Bidwells
Birstall & Wanlip Neighbourhood Watch
Birstall Hallam Fields Primary School
Birstall Highcliffe Primary School &

Community Centre
Birstall Post
Birstall Riverside Community Primary
School
Birstall The Cedars Academy
Blaby District Council
Bloor Homes Midlands
BNP Paribas Real Estate UK
Bolt Pro Tem Ltd
Boundless Networks Ltd
Bradgate Magazine
Bristol Water Plc
British Democratic Party
British Geological Survey
British Telecommunications plc
Broadband for the Rural North Ltd
Broughton & Dalby Parish Council
Building Research Establishment
Burnett Planning
Burton On The Wolds Primary School
Bytel Networks Ltd
Cadent (Gas)
Cala Homes (South) Ltd
Call Flow Solutions Ltd
Cambridge Fibre Networks Ltd
Canal & River Trust
Carter Jonas LLP
CBRE Ltd
Central North Sea Fibre
Telecommunications Ltd
Cerda Planning Ltd
Chapman Street Residents Association
Charles Lowe and sons/Generations
Charley Parish Council
Charnwood Arts
Charnwood Bangladeshi Society
Charnwood Disability Forum
Charnwood GP Network
Charnwood Together
Chilton Strategic Land
City Screen Printers UK) Ltd
CityFibre Metro Networks Ltd
CityLink Telecommunications Ltd
Civil Aviation Authority

Cogent Communications UK Ltd
COLT Technology Services
Community Fibre Ltd
Concept Solutions People Ltd
Cornerstone Telecommunications
Infrastructure Ltd
Cossington C.E. Primary School
Costock Parish Council
Countryside Properties
County Broadband Ltd
CPRE - Charnwood District
CPRE charnwood
CPRE Leicestershire
CTIL
Cyclist Touring Club
David Wilson Homes East Midlands
Define
Department for Work & Pensions
Department of Constitutional Affairs
Derbyshire Gypsy Liaison Group
Derwent Living
Design Council - CABE
Dev Plan
DLP Planning Consultants
DLP Planning Ltd (East Midlands)
Dwr Cymru Cyfyngedig
E A Lane & Sons
East Goscote Broomfield Primary School
East Leake Parish Council
East Leicestershire & Rutland Clinical
Commissioning Group
East Midlands Airport
East Midlands Council
Education & Skills Funding Agency
EE Ltd
Eircom UK Ltd
EMH Group
Energis Communications Ltd
Environment Agency
Equality Action
EU Networks Fiber UK Ltd
Euro Payphone Ltd
Eurobell Ltd
Fairhurst
Faulks, Perry, Culley & Rech
Fearon Community Association
FFR Ultrasonics Ltd

FibreSpeed Ltd
Fibrewave Networks
Fisher German LLP
Fisher Scientific UK Ltd
FLAG Atlantic UK Ltd
Forestry Commission
Fox Bennett
Fox Strategic Land & Property
Foxpark Limited
Framptons
Friends of Charnwood Forest
Fujitsu Services Ltd
G. Network Communications Ltd
Gaddesby Parish Council
Gamma Telecom Holdings Ltd
Garendon Park & Countryside Protection
Group
Geeta Bhawan
GeneSYS Telecommunications Ltd
Geo Networks Ltd
Gigaclear Plc
Gladmans Development
Glenfield Parish Council
Gorse Covert Community Association
Great Central Railway plc
Groby Parish Council
Gurudwara Sahib Sikh Community Centre
GVA
Haddon Way Residents Association
Hallam Land Management
Hamilton Community College
Hanover Housing Association
Hanson UK
Harborough District Council
Harris Lamb
Hastings Community Association
Hastings Residents Association
Hathern C.E.Primary School
Hawksmoor
Haydon Road Residents Association
Health & Safety Executive
Heaton Planning Ltd
Hibernia Express (UK) Ltd
Hickling Parish Council
Highways England
Highways England

Hinckley & Bosworth Borough Council
Historic England
Hoby with Rotherby Parish Council
Home Builders Federation Ltd
Homes England
Homes for the Homeless, Leicestershire
Home-Start Charnwood
Howkins & Harrison
Hungarton Parish Council
Hutchison 3G UK Ltd
HWRA (Haddon Way Residents'
Association)
Hyperoptic Ltd
In Focus Public Networks Ltd
Independent Fibre Networks Ltd
Indigo Planning Ltd
Internet Central Ltd
Internet Connections Ltd
Interoute (i-21 Ltd)
IX Wireless Ltd
Jas. Martin & Co
John Martin & Associates
John Storer Charnwood
KCOM Group Plc
Kegworth Parish Council
Keyham Village Meeting
Kinchbus
Kingfisher Area Residents Group (KARG)
Kingston on Soar Parish Council
Knight Frank
KPN EuroRings B.V.
Lancaster University Network Services Ltd
Landmark Planning Limited
LAQPG
Leicester & Leicestershire Enterprise Council
Leicester Audi
Leicester City Council
Leicester City Council -Transport
Leicester Diocesan Board of Finance Leicestershire & Rutland Playing Fields
Association
Leicestershire & Rutland Rural
Community Council
Leicestershire and Rutland Association of
Local Councils
Leicestershire Bridleways Association

Leicestershire Campaign for Better Transport Leicestershire Centre for Integrated Living Leicestershire Constabulary Leicestershire County Council Leicestershire County Council -Environment & Transport Leicestershire Local Access Forum Leicestershire Police HQ Leicestershire Waste Partnership Leics & Rutland Assoc of Local Councils Level 3 Communications UK Ltd LHA-ASRA Group Lichfields Local Enterprise Partnership Long Whatton & Diseworth Parish Council Longhurst Group Loughborough Ashmount School Loughborough Beacon Academy Loughborough Booth Wood Primary School Loughborough C of E Primary School Loughborough Charnwood College Loughborough Churches Partnership Loughborough Cobden Primary School & Community Centre Loughborough Conservative Association Loughborough Conservatives Loughborough Council of Faiths Loughborough De Lisle College Loughborough Echo Loughborough Endowed Schools Loughborough Holywell Primary School Loughborough Limehurst Academy Loughborough Mosque & Islamic Cultural Association Loughborough Mountfields Lodge School Loughborough Naturalists' Club Loughborough Outwoods Edge Community Primary School Loughborough Polish Community Centre Loughborough Rendell Primary School Loughborough Robert Bakewell Primary School & Community Centre Loughborough Sacred Heart Catholic Voluntary Academy Loughborough Saint Mary's Catholic Primary School Loughborough Stonebow Primary School

Loughborough Students Union Loughborough Thorpe Acre Junior School Loughborough Town Centre Partnership Loughborough Woodbrook Vale High School Love Loughborough BID Company Ltd Lowesby & Cold Newton Parish Meeting LSWAG M & S Solicitors Marcus Bates Ltd Marine Management Organisation Markfield Parish Council Marrons Planning Mather Jamie Ltd Maximus Networks Ltd. Melton Borough Council Merton College Metropolitan Development Services Metropolitan Housing Trust Midland Heart Midlands Rural Ministry of Defence MLL Telecom Ltd Mosaic - Shaping Disability Services Mountsorrel Christ Church & St.Peter's C.E. Primary School Mountsorrel Post MS3 Networks Ltd Nanpantan Residents Association Nathaniel Lichfield & Partners National Farmers' Union, (East Midlands) National Federation of Gypsy Liaison Groups National Forest Company National Forest Company National Grid Ltd Network Rail Network Rail Network Rail Property Newtown Linford Primary School NextGenAccess Ltd NHS Leicestershire & Rutland NHS Property Services Ltd Normanton on Soar Parish Council North West Leicestershire District Council	
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	NHS Property Services Ltd
North West Leicestershire District Council	Normanton on Soar Parish Council
	North West Leicestershire District Council

Northumbrian Water Ltd
Nottingham Community Housing
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Nottinghamshire County Council
NWP Street Ltd
NWRG
O2 (UK) Ltd
Oadby & Wigston Borough Council
Office of Rail & Road
Open Network Systems Ltd
OPUN
Orange Personal Communication
Services Ltd
Oxalis Planning
Parkers of Leicester Ltd
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Persimmon Homes
Persimmon Homes & Charles Church
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Persimmon Homes Notts
Plainview Planning Ltd
Planinfo
Planning and Design Group
Planware Ltd
Queniborough C.E. Primary School
Queniborough Gazette
Queniborough Neighbourhood Plan Group
Queniborough Parish Office
Quickline Communications Ltd
Quorn Neighbourhood Plan Group
Quorn Rawlins Academy
Quorn St Bartholomew's C.E. Primary
School
Rawlins Academy
Reach Europe Ltd
Rearsby Neighbourhood Plan Group
Rearsby St Michael And All Angels C.E.
Primary School
Redrow Homes East Midlands Ltd
Rempstone Parish Council
rg+p Ltd
Richborough Estates Ltd
Riverside Housing
RNIB Vocational College
Road Haulage Association
Rosebery Community Centre Ltd

Rothley C.E. Primary School
Rothley Neighbourhood Plan Group
Roundabout Magazine
Roundhill Academy
Royal National Institute for Deaf People
Rural Community Council (Leicestershire
& Rutland)
Rushcliffe Borough Council
Rutland County Council
Savills
Scottish Water
Scraptoft Parish Council
Sea Fibre Networks Ltd
Seagrave Parish Magazine
Seagrave Village Primary School
Serco UK&E Local Regional Government
Severn Trent Water Ltd
Shelthorpe Residents Association
Shepshed Iveshead School
Shepshed Newcroft Primary School
Shepshed Oxley Primary School
Shepshed Saint Winefride's Catholic
Voluntary Academy
Shepshed St Botolph's C.E. Primary School
Shepshed Town Council Shree Ram Krishna Community
Association
Sidings Park Residents Association
Sikh Temple
Sileby Highgate Community Primary
School
Sileby Neighbourhood Plan Group
Sileby Redlands Community Primary
School
SIP (Industrial Products) Ltd
Sky Telecommunications Services Ltd
Smallworld Media Communications Ltd
Solway Communications Ltd
South East Water Plc
South Notts Bus Company Limited
South West Water Ltd
Sport England
Sprintlink UK Ltd
Spyder Facilities Ltd
SSA Planning Limited
SSE Telecommunications Ltd
Stanford on Soar Parish Council

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Straw & Pearce
Subtopia Ltd
Surf Telecoms Ltd
Sutton and East Surrey Water Plc
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Swithland St. Leonard's C.E. Primary
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Syston St Peter & St.Paul Academy
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Syston Town News
Syston Wreake Valley Academy
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Thames Water Utilities Ltd
The Abbeyfield Loughborough Society
The Bridge Housing Association
The Coal Authority
The County Practice
The Crown Estate
The Garden Trust
The Jubilee Medical Practice & Training
Hub
The Mobile Operators Associations (MOA)
The Planning Inspectorate
The Prince's Trust EM Regional Office
The Quorndon
The Sirius Group
The Theatres Trust
The Wireless Infrastructure Company Ltd
The Woodland Trust
Thorpe Acre Residents Association
Thrussington C.E. Primary School
Thrussington Neighbourhood Plan Group
Thurcaston & Cropston Parish Council
Memorial Hall Thurcaston Richard Hill C.E. Primary
School
Thurmaston Action Group
Thurmaston Church Hill C.E. Junior

School
Thurmaston Church Hill Infant School
Thurmaston Eastfield Primary School
Thurmaston Times
TIBUS
Timico Partner Services Ltd
Tiscali UK Ltd
Trent Barton
Truespeed Communications Ltd.
Turley Associates Ltd
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UK Broadband Ltd
United Utilities Plc
Upper Broughton Parish Council
Urgo Ltd
Valuation Office Agency
Verizon UK Ltd
Viatel Infrastructure (UK) Ltd
Virgin Media Ltd
Vista (The Royal Leicestershire, Rutland
& Wycliffe Society for the Blind)
Vodafone Ltd
Voneus Ltd
Vtesse Networks Ltd
Warwick Way Residents Association
WarwickNet Ltd
WDA Planning Welbeck - The Defence Sixth Form
College
Wessex Water Services Ltd
West Cross Lane Fields Residents Group
West Leicestershire Clinical
Commissioning Group
Western Power Distribution
Westleigh Developments Limited
Wifinity Ltd
Wightfibre Ltd
Wildcard UK Ltd
William Davis Ltd
Willoughby on the Wolds Parish Council
Wood Plc
Woodhouse Eaves Maplewell Hall School
Woodhouse Neighbourhood Plan Group
Woodland Trust
Wyevale Garden Centres
Wysall & Thorpe in the Glebe Parish

Council

Yorkshire Water Service Ltd

Zayo Group UK Ltd