**Regulation 18 Consultation - 12 July - 23 August 2016**

| NAME/ORGANISATION | AGENT | RESPONSE | |
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| *Question 1 - Do we still face the same issues in Charnwood?* | | | |
| Mr Geoff Platts  Environment Agency |  | In respect of the issues that are within the remit of my Agency I confirm that the issues of "a pressured environment " and "climate change" are very much an issue that is ongoing and should be carried forward into the next Plan stage. | |
| Emilie Carr  Historic England |  | Do we still face the same issues in Charnwood?  Are there any other changing circumstances that need to be understood?  In order to ensure that the importance of heritage assets is emphasised, within Chapter 2: Context, paragraph 2.2 reference to heritage would be welcomed in relation to the description of the ‘Vision’ for Charnwood within the Core Strategy, which itself states that:-  “Our landscape and the special buildings, heritage and ecology it contains will be in a good state. Our picturesque villages will have retained their strong sense of identity.”  Protection of heritage assets within the Borough is of particular importance both given the particular wealth of assets within Charnwood and the pressure for development, and should be stressed throughout the Plan. Historic England would welcome the opportunity for early involvement in policy formulation, both formally and informally in relation to both previously discussed topics such as Garendon Park together with other areas, sites and issues. Will there be specific policies regarding renewable energy? Historic England would strongly welcome involvement in policy formulation.  The Local Plan provides a valuable opportunity to provide more detailed policies on areas where the Core Strategy is silent, such as Shop Fronts. | |
| Nina Wilson  Nottinghamshire County Council |  | Minerals and Waste  As a neighbouring authority, the County Council would draw the Borough Council’s attention to the adopted and emerging Minerals and Waste Local Plans for Nottinghamshire and the equivalent documents for Leicestershire. Leicestershire’s documents form part of the development plan for Charnwood and so the Local Plan will need to have regard to their content. Nottinghamshire’s documents will have implications in terms of cross-border issues and the duty to cooperate. All documents should be considered as the Local Plan is progressed.  For Nottinghamshire, the relevant documents are the adopted Nottinghamshire and Nottingham Waste Core Strategy (adopted 10 December 2013) (full title Nottinghamshire and Nottingham Replacement Waste Local Plan, Part 1: Waste Core Strategy) and the saved, non-replaced policies of the Nottinghamshire and Nottingham Waste Local Plan (adopted 2002), along with the Nottinghamshire Minerals Local Plan (adopted 2005) and emerging replacement plan (Submission Draft February 2016). | |
| Mrs Lesley Bell  Barrow upon Soar Parish Council |  | Barrow upon Soar Parish Council has considered the document in some detail.  The Council believes that much of the evidence base is outdated and much more up to date evidence is needed in many areas. It considers the Plan to be far too “Loughborough Centred”.  In particular, the Service Centres have been over developed to such an extent that the sustainability and viability of these centres has been irrevocably compromised.  A new, detailed, Service Centre Capacity Assessment needs to be undertaken in order to properly evaluate the impact of the current over development of such centres. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | Yes | |
| Ms Ann Irving |  | Whilst these two documents are from different stables, they contain the same horses, as the Strategic Growth plan is a collective of reps from each DC and aims to effectively co-ordinate the DC plans in conjunction with the business-focused LLEP.  The aim is for a single local plan for a longer period, so fewer individual documents that provide evidence for the assumptions underpinning the next plan. It depends on the results of the Growth Plan, which comes across as a little naïve and somewhat out of touch with reality on the ground – the shifting sands of actual behaviour and social trends.  Both organisations say more or less the same things – the need for jobs and housing, and their co-location, a quality environment, protected open spaces, support for industry, settlement identity, building on strengths, transport infrastructure.  • Both aim to reduce the need for people to travel with a genuine choice to walk, cycle or use public transport. Both assume that if you build houses near jobs, you solve the transport problems of congestion and pollution.  Without sanctions, this is impossible. You can buy a house in place X and there is nothing to stop you from choosing to work in town Y. Unless an employer insists on a distance-from-work rule, as was the case when I started work as a lecturer at L’borough University, and the Army also has one. Both were/are 15 miles. The reason I was given was because employer felt that any further and we might have trouble getting to work in winter … it seemed reasonable to me. If more employers did the same, maybe more people would live closer to work.  • Both outline the need to address the pressure on housing.  Without restrictions on development and developers, this will never be resolved. LPAs cannot prevent bungalow demolition in favour of building replacement large homes of higher value. LPAs cannot prevent extensions for owners to add value to small properties thus reducing the pool of more affordable homes. Even if an estate is granted permission on the back of X% affordable homes, once people move in, the cycle of extensions starts. LPAs cannot force developers to build modest, possibly terraced housing that was adequate for many previous generations without needing government help to take out large debts to pay for housing. Whole cities were built up on terraced living. Most families are now not only small, but for half of the population at school, only needed for 18 years before children leave home. This is significantly different from even a few decades ago and simply isn’t reflected in housing policy. The mis-match between permissions and delivery are entirely self-induced. Another issue is the two-home family following divorce. I don’t know you solve that problem but it has increased the number of homes needed considerably. At one time, it would have been a house and a flat but now it is two 3-bed houses. This needs to be factored in, sadly. Finally, DCs MUST build [low cost] houses themselves. I know why they currently can’t but they have to lobby harder and get the rest of us on side to join the lobby. The market will never deliver them. The tragedy here is that there are plenty of construction workers who are busy when the industry says there is a shortage that stops more house building – but on Charnwood and maybe the rest of the county these skilled workers are building legacy extensions and flattening perfectly good homes so that owners can just accrue more value. If this was paused for 3 years, they would have to divert to new home building.  • Both outline the need to create employment.  Neither provides sufficient detail of how these can be done. Both make an assumption that growth is the holy grail. Many economists now argue against more growth and that it cannot ever be infinite. There are models for steady states that can feed, clothe and house themselves without significant inward investment, tourism, transport infrastructure. This is an extract from an email sent by a contact of mine:  “ … one of the people we have to 'blame' for the 'growth mantra' is Adam Smith, but according to the interesting article here, Adam Smith imagined a 200-year phase of economic growth followed by a steady state! See also Wikipedia page here, which refers to a stage where "the economy has reached its stationary state".  “On a related note, see the website of the New Economics Foundation and the World Economic Forum article here, for example.”  Unemployment is low – the figures in the Growth report appear to indicate a job for every 2 citizens in the current population, and yet includes proposals to draw in another 22,000 non-local jobs which, it hopes, will be taken by local people travelling by bike, foot or bus. Even current travel censuses show that a significant number of vehicles entering this area are not local. Why does this area have to attract more, and provide more transport infrastructure to do so?  • The knowledge economy, as represented by the education sector, which is rather pejoratively mentioned in the Growth Strategy, requires far less office space than most other industries and yet contributes hugely to GDP. It needs to be understood better as an industry that matters. From my experience, you can pack a lot more bodies into University accommodation for example by shuffling offices around.  • Both recognise the need to address climate change in this region. Without sanctions above, this cannot be adequately addressed. Land that could absorb wetter and warmer weather is being built on. People need incentives and guidance to go greener as it is so confusing. Pay a few council-backed experts to help and I’m sure this would make a difference.  Cars mean more tarmac and block paving drives [sub the 5 sq m limit]. Better to have ALL drives permeable. Gardens are being paved to get cars off roads with fast traffic, but too little is done to slow it down. Cars are essential for country areas because of poor public transport. It is almost de facto that children reaching 17 get cars here.  Environmental risks are limited to floods and energy when food production, farming, are more critical risks.  No farmer can be blamed for finding the enormous sums offered by developers more attractive than rising before dawn and struggling until past dusk. It is a low-worker numbers economy but arguably the most vital and pressured one we have. They already struggle with congestion on roads – why make things worse?  • Neither links up to changes in actual employment in the region. Neither understands the changes to population trends, other than age. Many of retired age are volunteering to fill employment gaps or are working part time like me. Many of traditional working age are choosing to work from home. Many more employed people are solo employees working in their own small DIY companies. Many have no office base as they are itinerant businesses that practice their craft in community venues rented hourly, like our village hall. Many small, local businesses in rural areas earn their living from work given to them by parish councils, a rising trend as tasks are passed down by DC and CC authorities. Broadband is largely being resolved after poor management of the rollout and is easily addressed with a mallet. One of our countrified businesses has given up and gone for satellite and is now, at long last, getting decent speeds. Some farmers are still complaining about their lack of decent speed connections.  • The Growth Strategy mentions ‘our competitors’ – who are they and why do we compete? Since when has there been a competition between our area and any other? When I arrived here, it was a county comprising village communities … far less so now. Strategically, most people want town attractions but most development is outside. This isn’t hard to adjust if the will exists at the top. I expect LPAs to lobby more strongly for Gov to change things.  Questions  • Do we still face the same issues in Charnwood?  Yes and no. The demographics of work, family and housing have all changed and are on a trajectory. | |
| Taylor Wimpey | Mr James Yeoman  Savills | Savills is appointed by Taylor Wimpey and Merton College, both of whom have significant land interests to the east and south of Syston. These interests have been the subject of promotion through the preparation of the, now adopted, Core Strategy and are therefore familiar to Charnwood Borough Council.  This correspondence relates to our clients’ interest to the east and south of Syston and the continued ability of this interest to deliver a sustainable form of development within the proposed new plan period to 2036. Savills duly submitted a response to the Council’s Call for Sites in May 2016. Our client’s maintain the potential of this land to deliver:  • A sustainable, residential-led, mixed-use urban extension for up to circa 1,350 homes;  • Potential for delivery of employment, education and recreational uses;  • Potential for strategic infrastructure delivery, including:  - a link road between Queniborough Road and Barkby Lane (providing relief to both Syston and Barkby) ; and  - rail infrastructure improvements with potential for provision of a new Syston Rail Station and improved parking facilities.  The following correspondence is submitted as a formal consultation response to Charnwood Borough Council’s Charnwood Local Plan (CLP) – Regulation 18 Consultation.  Consultation Response  The National Planning Policy Framework (NPPF) is clear in identifying the need to deliver sustainable development. For plan-making this means that:  • Local planning authorities should positively seek opportunities to meet the development needs of their area; and  • Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:  - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or  - Specific policies in the Framework indicate development should be restricted.  Sustainable development comprises three dimensions: economic, social and environmental roles. The Government identifies that the economic role should contribute to ‘building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure’.  The social role should support ‘strong vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being’.  The above two roles should be considered with the need to ‘protect and enhance our natural, built and historic environment’; an environmental role.  The NPPF identifies the need to ‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs’. This is supported by Paragraph 47 of the NPPF which identifies that a significant boost is required to the supply of housing. | |
| Scarlett Griffiths Highways England |  | Highways England welcomes the opportunity to comment on the Charnwood Local Plan – Regulation 18 document which has been produced for public consultation. It is noted that the Charnwood Core Strategy is being updated in line with guidance from Government to ensure that Local Plans remain up to date; to consolidate the current Core Strategy in to a single Local Plan document; and to extend the Local Plan to cover the period up to 2036 to align with partner authority’s timeframes. 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 (SRN). It is the role of Highways England 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, Highways England’s principal interest is safeguarding the operation of the M1 and A46 of which sections run through the Plan area. | |
| Mr Phill Bamford  Gladmans Development |  | 2 INTRODUCTION  2.1 Context  2.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development’s representations on the CLP.  2.1.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard we submit that in order to prepare a sound plan it is fundamental that it is:  • Positively Prepared – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.  • Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.  • Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and  • Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.  3 NATIONAL PLANNING POLICY  3.1 National Planning Policy Framework and Planning Practice Guidance  3.1.1 The National Planning Policy Framework has been with us now for over four years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets out the Government’s goal to ‘significantly boost the supply of housing’ and how this should be reflected through the preparation of Local Plans. In this regard, it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:  “To boost significantly the supply of housing, local planning authorities should:  • Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area  • Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements…”  • Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15” (Paragraph 47)”  3.1.2 The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the NPPF, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).  3.1.3 Once a local authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).  3.1.4 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:  • Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need  • Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.  • Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.  • Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.  • Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.  • The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.  • The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.  4 LEGAL COMPLIANCE  4.1 Duty to Cooperate  4.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.  4.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration , as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Charnwood must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.  4.1.3 Further, the PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that:  “These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters.”  4.2 Sustainability Appraisal  4.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.  4.2.2 The CLP should ensure that the results of the SA process clearly justify its policy choices. 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. Undertaking a comparative and equal assessment of each reasonable alternative, the CLP’s decision making and scoring should be robust, justified and transparent.  5 OBJECTIVELY ASSESSED HOUSING NEED  5.1 Background  5.1.1 The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.  5.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying  “the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:  • Meets household and population projections taking account of migration and demographic change;  • Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and  • Caters for housing demand and the scale of housing supply necessary to meet this demand.”  5.1.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.  5.1.4 Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in §17 of the Framework, which states:  ‘..Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.’  5.1.5 Of critical importance is what the Framework goes onto say in §158 in the section discussing Plan Making. It states here:  ‘Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.’  5.1.6 Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.  5.1.7 The formal publication of the Planning Practice Guidance in March 2014 gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extracts identify some particularly pertinent points.  ‘The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.’  5.1.8 The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.  5.1.9 In order to consider how market signals should be taken forward §20 identifies some key concepts:  ‘Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.’  5.1.10 It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully bench mark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing.  5.1.11 What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of plans that many local authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within.  5.1.12 The problems are noted in Fixing the Foundations: Creating a more prosperous nation published by HM Treasury in July 2015. In paragraph 9.7 the report states:  ‘There remains more to do. As the London School of Economics (LSE) Growth Commission found, ‘under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand.’  5.1.13 Gladman are therefore of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.  5.1.14 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:  “The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. […] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies”.  5.1.15 Therefore, following the exercise to identify the full, OAN for housing in an area,  “Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)  5.1.16 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.  5.1.17 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above, “Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:  • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or  • specific policies in this Framework indicate development should be restricted.”  5.1.18 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:  “sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.  5.1.19 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.  5.1.20 The National Planning Practice Guidance (NPPG) contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.  6 CHARNWOOD LOCAL PLAN  6.1 Context  Question 1 and Question 2 – Issues  6.1.1 Charnwood does still face similar issues to those set out in the adopted Local Plan. The population of the area continues to expand and the new Housing and Economic Development Needs Assessment (HEDNA) which is currently being prepared will set the context for the overall level of need to be catered for up until 2036.  6.1.2 In terms of housing market pressure, Charnwood is still suffering with significant issues which have been getting steadily worse. DCLG Live Tables comparing lower quartile house prices to lower quartile earnings by Local Authority show, that from 2013 the authority’s affordability ratio has increased from 6.47 to 7.21 in 2015, a rise of 11.5% in just 2 years. Clearly, more needs to be done in Charnwood to address this issue and this should be tackled through an uplift to the OAN to deal with Market Signals.  6.1.3 The current Local Plan also cites a constrained economy as an issue which is caused by the lack of land for new and expanding businesses. If Leicester and Leicestershire are to achieve their economic growth aims and potential, which will be set out in the upcoming Strategic Growth Plan, then the Charnwood Local Plan needs to play its part in allocating sufficient land to meet these aspirations. This also needs to be factored in when considering the level of housing required in the area over the next plan period as a lack of suitable, available and affordable housing can be a significant constraint factor in achieving the economic growth potential. The Charnwood Local Plan needs to closely monitor the progress made with the Strategic Growth Plan and ensure it is doing everything it can to facilitate its implementation.  6.1.4 It is also essential that the CLP, as it is being prepared, is mindful of the progress being made on the Leicester City Local Plan and specifically, whether Leicester City can accommodate all of its housing needs within its own boundaries. It is questionable, given the level of housing need identified for Leicester City and given the constraints facing the City, whether they can accommodate all of their housing needs on sites that are available, achievable and deliverable, especially with regards to viability. It may transpire therefore, that the other LPAs within the Leicester and Leicestershire HMA, including Charnwood, need to accommodate some of Leicester City’s unmet need. | |
| Mrs Sue Coulson  Birstall Parish Council |  | Yes - Broadly same issues are faced. | |
| Rick Hoyland  CPRE - Charnwood District |  | Q1 – Issues:  CPRE consider that the current issues will largely remain, particularly pressure on the countryside, the erosion of green space between settlements and an under supply of affordable homes and bungalows for the elderly and disabled. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 1  Do we still face the same problems in Charnwood?  In terms of the issues listed, Thurmaston still faces the following issues raised:  • Pockets of depravation – yes  • Lack of smaller affordable homes – Not an issue – Thurmaston has more than sufficient small affordable homes and is lacking in larger family homes and specialist home for the elderly.  • A constrained economy – not an issue – there is sufficient industrial land – new business premises are currently being developed on Melton Road.  • Increased volume of traffic – significant issue – congestion at peak times and throughout the weekends around Barkby Thorpe Lane shopping centres and at peak times on Humberstone Lane. These areas are gridlocked at peak times.  • Fear of crime – continued and worsening issue – crime in Thurmaston has increased significantly since the development of the Checkland Road estate where there are numerous and continuous problems with anti-social behaviour.  • Maintaining settlement and landscape identity – this is a key concern for the community of Thurmaston, it is essential that green wedges are protected.  • A pressurised environment – risk of flooding – Church Hill Road bridge in Thurmaston is regularly flooded. Increased development will exasperate existing problems.  • Climate change – continues to pose a risk and remains an issue.  • A lack of green space and leisure facilities – a need for a variety of greenspaces and leisure facilities to be included. | |
| *Question 2 - Are there any other changing circumstances that need to be understood?* | | | |
| Mr Geoff Platts Environment Agency |  | In respect of climate change it should be noted that updated Climate Change allowances came into force in February 2016 and these will need to be used in respect of updating any existing strategic flood risk assessment. | |
| Emilie Carr  Historic England |  | Questions 2  Do we still face the same issues in Charnwood?  Are there any other changing circumstances that need to be understood?  In order to ensure that the importance of heritage assets is emphasised, within Chapter 2: Context, paragraph 2.2 reference to heritage would be welcomed in relation to the description of the ‘Vision’ for Charnwood within the Core Strategy, which itself states that:-  “Our landscape and the special buildings, heritage and ecology it contains will be in a good state. Our picturesque villages will have retained their strong sense of identity.”  Protection of heritage assets within the Borough is of particular importance both given the particular wealth of assets within Charnwood and the pressure for development, and should be stressed throughout the Plan. Historic England would welcome the opportunity for early involvement in policy formulation, both formally and informally in relation to both previously discussed topics such as Garendon Park together with other areas, sites and issues. Will there be specific policies regarding renewable energy? Historic England would strongly welcome involvement in policy formulation.  The Local Plan provides a valuable opportunity to provide more detailed policies on areas where the Core Strategy is silent, such as Shop Fronts. | |
| Mrs Lesley Bell  Barrow upon Soar Parish Council |  | We would refer Plan Team to the following documents:  • The emerging Neighbourhood Plan for Barrow upon Soar.  • The Barrow upon Soar Parish Council Sustainability Report.  We would welcome the opportunity to discuss our thoughts with the Plan Team and look forward to responding in greater depth as the Plan develops. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | Increasing traffic congestion and likely increase in flooding risk. | |
| Ms Ann Irving |  | • Are there any other changing circumstances that need to be understood?  Family homes are for around half of all families only until children reach 18. More solo housing is needed for 21+ and not for the retired alone. Fractured families mean two homes not one | |
| Taylor Wimpey | Mr James Yeoman  Savills | Question 2 – Changing circumstances that need to be understood?  The Strategic Growth Plan for Leicester & Leicestershire will be an important document for establishing the future growth requirements of the Charnwood Borough. This will include housing, employment and infrastructure requirements which, as the CLP – Regulation 18 Consultation Document correctly identifies, will be important in shaping the strategic direction for Leicester and Leicestershire.  For this reason, we highlight Network Rail’s East Midlands Route Study (March 2016) which reports potential for future rail works related to Syston. This includes four and double tracking in the immediate network, resignalling works and delivery of a second platform at Syston station in Control Period 6 (2019-24). Infrastructure delivery in the Borough has the potential to further improve the sustainable credentials of existing settlements and this could play an important role in informing the appropriate growth strategy. | |
| Mr Ian Nelson  North West Leicestershire District Council |  | You will be aware that the government attaches considerable importance to ensuring that local plans meet all of the development needs of an area. Furthermore, it is apparent from the consultation document that there are ambitious plans for the Enterprise Park at Loughborough University and the regeneration of specific areas in the borough. Therefore, it is surprising and disappointing that no commitment has been included to the local plan meeting all of the boroughs objectively assessed needs, especially those for housing. Such a commitment at this early stage is considered to be very important to demonstrate that any future local plan is likely to be robust and in accordance with national policies. | |
| Grant Butterworth  Leicester City Council |  | Question 2  It is important that the new Local Plan takes account of the emerging joint evidence being produced by Charnwood and your partners and stakeholders, including the City Council.  This includes the Housing and Economic Development Needs Assessment (HEDNA). | |
| Mr Phill Bamford  Gladmans Development |  | 6 CHARNWOOD LOCAL PLAN  6.1 Context  Question 1 and Question 2 – Issues  6.1.1 Charnwood does still face similar issues to those set out in the adopted Local Plan. The population of the area continues to expand and the new Housing and Economic Development Needs Assessment (HEDNA) which is currently being prepared will set the context for the overall level of need to be catered for up until 2036.  6.1.2 In terms of housing market pressure, Charnwood is still suffering with significant issues which have been getting steadily worse. DCLG Live Tables comparing lower quartile house prices to lower quartile earnings by Local Authority show, that from 2013 the authority’s affordability ratio has increased from 6.47 to 7.21 in 2015, a rise of 11.5% in just 2 years. Clearly, more needs to be done in Charnwood to address this issue and this should be tackled through an uplift to the OAN to deal with Market Signals.  6.1.3 The current Local Plan also cites a constrained economy as an issue which is caused by the lack of land for new and expanding businesses. If Leicester and Leicestershire are to achieve their economic growth aims and potential, which will be set out in the upcoming Strategic Growth Plan, then the Charnwood Local Plan needs to play its part in allocating sufficient land to meet these aspirations. This also needs to be factored in when considering the level of housing required in the area over the next plan period as a lack of suitable, available and affordable housing can be a significant constraint factor in achieving the economic growth potential. The Charnwood Local Plan needs to closely monitor the progress made with the Strategic Growth Plan and ensure it is doing everything it can to facilitate its implementation.  6.1.4 It is also essential that the CLP, as it is being prepared, is mindful of the progress being made on the Leicester City Local Plan and specifically, whether Leicester City can accommodate all of its housing needs within its own boundaries. It is questionable, given the level of housing need identified for Leicester City and given the constraints facing the City, whether they can accommodate all of their housing needs on sites that are available, achievable and deliverable, especially with regards to viability. It may transpire therefore, that the other LPAs within the Leicester and Leicestershire HMA, including Charnwood, need to accommodate some of Leicester City’s unmet need. | |
| Mr Phill Bamford Gladmans Development |  | 7 CONCLUSIONS  7.1.1 Having considered the CLP, Gladman are concerned about a range of matters including the housing and employment needs, spatial strategy, housing and natural and historic environment.  7.1.2 The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance, the Council must start with clearly defining an NPPF and PPG compliant OAN by developing an unconstrained requirement which properly follows the guidelines set out at the national level. The Council should then develop a robust housing requirement using this OAN as a starting point.  7.1.3 Careful consideration needs to be given to the spatial strategy that forms the basis of the spatial distribution of growth across the district. All sustainable settlements should be allowed to play their part in meeting their own housing and employment needs as well as contributing to the wider district’s requirements. A flexible approach to delivering the development needs of the district will ensure the plan’s ultimate deliverability and success. | |
| Mrs Sue Coulson  Birstall Parish Council |  | There is an increasing need to consider local infrastructure needs and the impact of increases in traffic | |
| Rick Hoyland  CPRE - Charnwood District |  | Q2 – Changing Circumstances:  Development pressures on the countryside and the threat of coalescence to independent settlements require effective regulation. New Green Belts and Wedges should be established.  Policies are required to manage the growth of (silent) electric vehicles and the attendant servicing and health and safety implications. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 2  Are there any other changing circumstances which need to be understood?  • Yes – projected substantial major development in and around Thurmaston, yet a decrease in services due to Local Government cuts – closure of Library, Banks and Post Office over the last few years.  • Loss of village identity.  • Increase in crime but reduction in Police.  • Reduction in services including grass cutting and highway maintenance.  • Does the Borough Council still consider that Thurmaston is a ‘service centre’? | |
| *Question 3 - Should the strategy be continued to 2036?* | | | |
| Mr Geoff Platts  Environment Agency |  | Yes | |
| Emilie Carr  Historic England |  | Question 3  Should the strategy be continued to 2036?  If the Local Plan is to continue beyond the Core Strategy period of 2028, a strategic heritage policy should be included in the event of any future gap. Paragraph 156 of the NPPF stresses that Local Planning authorities should set out the strategic priorities of the area within the Local Plan which should include strategic policies to deliver conservation and enhancement of the historic environment. Paragraph 157 goes on to state that Local Plans should contain a clear strategy for enhancing the historic environment. This is of particular importance as, if Neighbourhood Plans are brought into force, the policies within the Neighbourhood Plan take precedence over existing non-strategic policies in the Local Plan. We would be more than happy to advise on future draft policies as appropriate. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | Yes | |
| Taylor Wimpey | Mr James Yeoman  Savills | Question 3 – Should the strategy be continued to 2036? & Question 14 – Should the Core Strategy Vision to 2028 continue for the period to 2036?  The Strategy summarised within the CLP – Regulation 18 document (paragraph 2.8) remains relevant, in so far as the pressures that are faced in delivering development (e.g. housing need, environmental constraint). However, the growth strategy should be informed by the objectively assessed needs identified for the Charnwood Borough in the plan period. Accordingly, the quantum of housing and employment growth should be updated.  In turn the spatial strategy (paragraph 2.5) will also need to be re-assessed. The growth locations identified to deliver Sustainable Urban Extensions will still be subject to development throughout the current Core Strategy period (2011-2028) and potentially beyond. Alternative growth locations, based on principle of sustainable development, will need to be identified. In this regard, the Strategy will need updating. | |
| Mr Phill Bamford  Gladmans Development |  | Question 3 – Strategy  6.1.5 It is considered that the current strategy should be continued up to 2036 with tweaks where new evidence shows that additional issues need to be addressed or where it is clear that the current Local Plan is not doing all it can to deliver the objectives that it set out to achieve. | |
| Mrs Sue Coulson  Birstall Parish Council |  | It seems sensible to cover until 2036 but with regular reviews built in | |
| Rick Hoyland  CPRE - Charnwood | District | Q3 – Continue to 2036?:  Subject to addressing the foregoing concerns, CPRE consider that the strategy should be extended to 2036. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 3  Should the strategy be continued until2036?  Yes in view of continuation of problems beyond 2028. | |
| *Question 4 - Do you agree that the new plan cover the period to 2036?* | | | |
| Mr Geoff Platts  Environment Agency |  | Yes | |
| Mr Terry Kirby  Leicestershire Local Access Forum |  | Given the likeliness of a combined authority being approved by the end of this year and the strategic issues which will then be addressed jointly with neighbouring authorities, we feel that the Strategic Growth Plan for Leicester and Leicestershire suggests that the Charnwood plan should be for the period to 2036 | |
| Mrs Lesley Bell  Barrow upon Soar Parish Council |  | The Plan should undoubtedly continue through to 2036. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | Yes | |
| Ms Ann Irving |  | • Do you agree that the new plan cover the period to 2036?  The above changes happen within a generation, so yes. | |
| Taylor Wimpey | Mr James Yeoman  Savills | Question 4 – Do you agree that the new plan cover the period to 2036?  The Council proposes a timetable to adoption of the CLP by 2019. Assuming this is achievable, the CLP will set out a period in excess of 15 years following adoption of the Plan. Subject to the achievability of this planmaking timetable and a consistent approach across the ‘Strategic Growth Plan’ area, this is considered an appropriate timescale. | |
| Grant Butterworth  Leicester City Council |  | Question 4  The City Council is currently preparing a Local Plan that will run to 2031. It would be preferable if local authorities across the Housing Market Area all had Local Plans that worked to the same end date. However, given your timetable (including the estimated adoption date), we understand why choosing an end date of 2036 would be your preferred option, and therefore support this approach. | |
| Scarlett Griffiths  Highways England |  | In light of the Local Plan’s period being extended to 2036 to align with partner authority’s timeframes, it is noted that the Council is intending to carry out a review to ensure that the Plan and its evidence base remains relevant and sustainable across this additional period. This is welcomed by Highways England and, from a transport perspective, we particularly note that the Council has identified a need to understand how travel patterns will grow and change over the longer period and the opportunities available to encourage a greater proportion of trips by sustainable means like walking, cycling and public transport. | |
| Mr Phill Bamford  Gladmans Development |  | 6.2 Preparing the New Plan  Question 4 – Plan Period  6.2.1 It is agreed that the new plan timeframe should be to 2036. This will align with the other LPAs in the Leicester and Leicestershire area as well as with the HEDNA update and other key pieces of evidence. The CLP should also be mindful of the fact that the Strategic Growth Plan will cover the period to 2050 and therefore the CLP needs to set the building blocks for delivering the aims and objectives of the Strategic Growth Plan beyond 2036. | |
| Rick Hoyland  CPRE - Charnwood | District | Q4 – New plan to cover the period to 2036?:  Yes, subject to the caveats stated under Q3 | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 4  Do you agree that the new plan cover to the period to 2036?  Yes in view of continuation of problems beyond 2028. | |
| *Question 5 - Do we need any other evidence to understand the amount of development needed?* | | | |
| Mr Geoff Platts  Environment Agency |  | No comments outside of my area of expertise. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | Need to access the needs of service centres set preferred standards and access how each service centres compares. | |
| Ms Ann Irving |  | • Do we need any other evidence to understand the amount of development needed?  Yes. Evidence of solo living and working but more pressure on universities to provide more on campus, family and lodger living rather than using up community homes that are then left empty for a third of the year. | |
| Mr Phill Bamford  Gladmans Development |  | Question 5 – Amount of Development  6.2.2 As stated previously, the update to the HEDNA to take account of the 2014 SNPPs and 2014 Household Projections as well as new economic forecasts and the aspirations of the Strategic Growth Plan will be critical to the preparation of the CLP. This work will not only inform Charnwood of what it needs to provide, but will also set out the wider needs across both the HMA and FEMA.  6.2.3 The recently published Strategic Growth Statement (August 2016) makes reference (at paragraphs 5.3 to 5.5) to the work that all authorities across Leicester and Leicestershire are currently undertaking on the HEDNA and also sets out that the intention of the HEDNA is to become a new objective assessment of housing and economic development needs to 2031 and 2036, replacing the Leicester and Leicestershire Strategic Housing Market Assessment (2014). A clear commitment is made to the production of a new Memorandum of Understanding based on this new evidence base to replace a similar document that was produced in 2014. The outcome of this work and the associated Memorandum of Understanding between the authorities will therefore be an important factor in the consideration as to whether the CLP can deliver objectively assessed development needs, including any un-met need in the context of fulfilling the Duty to Cooperate.  6.2.4 The Council also need to update and scrutinise their evidence in relation to development constraints so as to be able to test whether any harm caused to these constraints significantly and demonstrably outweigh the benefits of delivering the full OAN for housing.  6.2.5 This approach to environmental capacity assessment would follow the Local Plan Expert Group’s (LPEG) recommendations to Government on enhancing the Local Plan system, ensuring that housing need is fully addressed by LPAs. It is therefore recommended that the Council undertake a similar exercise to fully test their capacity for housing delivery. | |
| Mrs Sue Coulson  Birstall Parish Council |  | When Planning submissions are made there needs to be increased focus on adequate parking provision to avoid roads becoming car parks | |
| Rick Hoyland  CPRE - Charnwood District |  | Q5 – Evidence to understand the amount of development needed?  Evidence must take account of ‘The Leicestershire Adult & Social Care Accommodation Strategy 2016-20126’.  Evidence must also take account of measures to protect the countryside and resist coalescence. | |
| Tracey Kunne  Thurmaston Parish Council |  | Do we need any other evidence to understand the amount of development needed?  Further evidence is required to assess the infrastructure, services and facilities available for the potential high numbers of new residents in Thurmaston. A further comprehensive assessment of traffic should be conducted and the Borough Council should liaise closely with the Parish Council and Local groups to assess local services and facilities in terms of open space, sport and recreation. Previous surveys conducted by independent consultants commissioned by the Borough Council have not consulted with the community and have been highly inaccurate. | |
| *Question 6 - Do we need any other evidence to understand and plan for the spatial strategy?* | | | |
| Mr Geoff Platts  Environment Agency |  | Within the remit of my Agency the Strategic Flood Risk Assessment is essential based on the updated Climate Change allowances which came into force in February 2016. Our other concern is the supply of potable water and the disposal of waste water. Water is available in the Soar catchment area. In respect of waste water disposal this is regulated by this Agency but the onus on provision and necessary infrastructure rests with the Severn Trent Water Ltd and as such consultation with them is essential. | |
| Emilie Carr  Historic England |  | Question 6 Do we need any other evidence to understand and plan for the spatial stragegy?  Reference to a Heritage Assessment within paragraph 3.15 is welcomed, it would be helpful to also reference it within paragraph 3.11 to ensure that heritage assets are fully taken into account throughout the plan. | |
| Mrs Lesley Bell  Barrow upon Soar Parish Council |  | Measures need to be put in place to urgently redress the imbalance that has been created particularly in the following:  • School  • Medical Facilities  • Community Facilities & Services  • Transport  • Homes  • Jobs | |
| Mrs Liz Hawkes  Anstey Parish Council |  | Yes comments are per question five:  Need to access the needs of service centres set preferred standards and access how each service centres compares. | |
| Taylor Wimpey | Mr James Yeoman  Savills | Development Potential at Syston  The sustainable credentials of Syston are recognised by the Council’s evidence base. Indeed the Council’s Service Centre Capacity Assessment (December 2011) reported Syston and the largest and most sustainable community of the Service Centres assessed.  Our client’s significant land interests to the south east of Syston provide opportunity to deliver strategic development with significant infrastructure improvements (e.g. link road and rail improvements). For this reason, we enclose an illustrative masterplan proposal as to the form of development that could be delivered via the new Charnwood Local Plan. This could take the form of a strategic extension to Syston for up to circa 1,350 residential units.  A key consideration in identifying specific site allocations is the principle of deliverability. The Council will be aware that Planning Application 13/0925/2 was granted outline planning consent in January 2014. That application secured the delivery of up to 149 dwellings on land to the south of Barkby Road, Syston. In addition to confirming land east of Syston as a sustainable development location, the permission has been  implemented by Taylor Wimpey. Currently of the 148 plots, 43 houses have been completed and occupied, 48 have been reserved or exchanged and 57 are yet to be sold. It is estimated that development will be completed by Spring 2018. This recent permission demonstrates the ability of Taylor Wimpey to deliver land in this location for development.  In light of the above comments, Taylor Wimpey and Merton College respectfully request the right to comment further on the Charnwood Local Plan as the preparation of the document advances. Taylor Wimpey and Merton College maintain that the sustainable credentials of Syston and the ability of its land interests to deliver residential-led development. | |
| Mr Phill Bamford  Gladmans Development |  | Question 6 – Spatial Strategy  6.2.6 Whilst it is recognised that there is a need to concentrate a majority of development in areas that are considered to be the most sustainable with the greatest access to services and facilities, it must be acknowledged that rural settlements are not inherently unsustainable. In fact, they can be extremely sustainable as people are able to access everyday services and facilities within a short walk, whereas within a larger urban area this may not be possible due to the scale of the settlement.  6.2.7 Para 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential therefore, that the needs of the sustainable rural settlements across the district are assessed and a meaningful level of growth apportioned to them to ensure their ongoing vitality and viability. This will help to preserve and enhance rural services and facilities and allow local rural communities to meet their own needs for housing whilst providing much needed affordable housing in the parts of the district that suffer with the greatest affordable housing need.  6.2.8 The update to the Charnwood Settlement Hierarchy Assessment therefore needs to carefully consider the guidance set out in para 55 of the Framework and be detailed enough to fully understand the needs of the smaller settlements so that growth can be apportioned to them to ensure their on-going vitality and viability. | |
| Rick Hoyland  CPRE - Charnwood District |  | Q6 – Evidence regarding Spatial Strategy:  Evidence must take account of the ‘Strategic Growth Plan for Leicestershire’. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 6  Do we need any other evidence to understand and plan for the spatial strategy?  Further evidence is required to assess the infrastructure, transport, traffic and services and facilities available for the potential high numbers of new residents in Thurmaston. The Borough Council should liaise closely with the Parish Council and Local groups. | |
| *Question 7 - Do we need any other evidence to understand and plan for the transport strategy?* | | | |
| Mr Geoff Platts  Environment Agency |  | No comments as this topic is outside of my area of expertise. | |
| Nina Wilson  Nottinghamshire County Council |  | Strategic Highways  The County Council can advise that we have no strategic transport observations to make on the proposed transport modelling as evidence to support and test proposed growth options. The County Council would of course be interested to see and consider the transport evidence and any cross boundary transport issues once this is published and consulted upon.  Travel and Transport  Charnwood is a large neighbouring authority bordering the Southern edge of Nottinghamshire’s Rushcliffe Borough.  The statements regarding public transport in Section 2.4 of the document are supported.  The following comment is supported in Chapter 3 – ‘Transport Strategy’, 3.12 – 3.13: comments that “The Core Strategy proposes significant investment in transport improvements to support and mitigate the growth being delivered to 2028 and the opportunities available to encourage a greater proportion of trips by sustainable means like walking, cycling and public transport.”  Whilst there are no Nottinghamshire supported local services operating into the Charnwood District there are commercial services operated by Trent Barton and Kinchbus.  Service 9 offers a frequent service between Nottingham and Loughborough whilst the Skylink service also operates to Loughborough via East Midlands Airport. Trent Barton recently extended their Skylink service to serve Coalville in response to consultation between Trent Barton and businesses in North West Leicestershire.  These services may need to be reviewed in response to future developments, and may require developer contributions where significant change is proposed along the route.  Many scholars living in Hathern attend school at Nottinghamshire’s East Leake Academy. Any entitlement to free travel to school for Hathern residents is the responsibility of Leicestershire County Council. Nottinghamshire County Council do provide a facility whereby students may purchase season passes for travel on school buses serving the area.  Transport & Travel Services request to be consulted on any proposed developments close to the border with Nottinghamshire which may have a significant impact on public transport requirements along routes entering the Rushcliffe Borough area. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | Yes, congestion must be minimised measured to addressed. This must be part of the strategy. | |
| Ms Ann Irving |  | • Do we need any other evidence to understand and plan for the transport strategy?  Yes – solo work patterns and the myriad of one-man-band new businesses that use village halls for their workplace. | |
| Grant Butterworth  Leicester City Council |  | Question 7  There is a need to clarify the transport modelling that will be used. The modelling needs to be consistent with the Strategic Growth Plan work. Cross-boundary development and the required infrastructure will be a key element of the evidence.  The Local Plan should address the need to increase the uptake of low emission vehicles by providing for electric and alternatively fuelled vehicles. | |
| Scarlett Griffiths  Highways England |  | We also welcome that this assessment is to be informed by transport modelling to test transport solutions and will include an infrastructure assessment to examine planned and potential road and public transport improvements. We also note that a Strategic Growth Plan is also being prepared for Leicester and Leicestershire, which the new Local Plan for Charnwood will take its lead from. The Growth Plan will be informed by a Housing and Economic Needs Assessment which will provide evidence for the number of homes and jobs needed across Leicester and Leicestershire to 2036. Highways England considers that this represents an appropriate approach to the preparation of the Charnwood Local Plan review.  Highways England has no further comments to make at this stage but, given the important role that the M1 and A46 play in serving the Charnwood area, we will be happy to engage with the council and its partners on its assessment of transport issues and infrastructure requirements as the Local Plan progresses. | |
| Mrs Sue Coulson  Birstall Parish Council |  | It would be sensible to conduct surveys to understand communities transport needs | |
| Rick Hoyland  CPRE - Charnwood District |  | Q7 – Transport Strategy:  Evidence must carefully review the proposals for reinstating a passenger service on the Leicester to Burton rail line. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 7  Do we need any other evidence to understand and plan for the transport strategy?  Yes – a comprehensive traffic survey/assessment is required and it is fundamental that this should include traffic monitoring during peak times on Humberstone Lane and Barkby Thorpe Lane and over the weekend on Barkby Thorpe Lane. | |
| *Question 8 - Do we need any other evidence to understand and plan for the environment?* | | | |
| Mr Geoff Platts  Environment Agency |  | An Ecosystem Approach to Development Planning  In order to sustainably plan development in Charnwood we advise an ecosystem approach is taken the local plan and that an ecosystem services assessment is undertaken to fully identify services provided by existing ecosystems. This will ensure development allocations and proposals take full account of these services throughout the plan process and will in the long term help to protect and enhance existing ecosystems to the benefit of people and wildlife.  Examples of Ecosystem services are shown below: -  Source: <http://www.ceeweb.org/work-areas/priority-areas/ecosystem-services/what-are-ecosystem-services/>  More information on taking an ecosystem approach and undertaking an ecosystem services assessment can be found using the following links: -  Parliamentary Office of Science and Technology, POST Note No.281 on Ecosystem Services,  What nature can do for you, DEFRA's practical introduction to making the most of natural services, assets and resources in policy and decision making.  An introductory guide to valuing ecosystem services, DEFRA guide.  Ecosystem services assessment: How to do one in practice October 2013 - <https://www.the-ies.org/sites/default/files/reports/ecosystem_services.pdf>  Water Framework Directive (WFD)  Regulation 17 of the Water Environment (WFD)(E&W) Regulations 2003, (current UK legislation) places a duty on each public body including local planning authorities to ‘have regard to’ River Basin Management Plans (RBMP’s), in this instance the Humber RBMP. Further the National Planning Policy Framework (NPPF) (para 2) states planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements. It also (para 165) identifies RBMPs as a source of evidence. In legal terms the WFD applies whether or not national planning policy refers to it and is a material consideration for a planning decision.  Considering the above we advise an assessment is made of the existing WFD status of catchments within the borough and the likely pressures these waterbodies will face as a result of future development. We will expect plan policy to refer to the WFD and to ensure watercourses are protected especially for the three WFD quality elements including chemistry, biology and hydromorphology. Plan policy should also promote the enhancement of watercourses which would benefit the WFD status of waterbodies and should ensure adequate buffers are placed between development proposals and a watercourse. Where development is likely to lead to a modification of a watercourse such as a culvert, diversion or hard embankments then plan policy should make it clear that a WFD Assessment will be required from the applicant to ensure there are no local or cumulative impacts to the aforementioned quality elements.  The Role of Local Authorities under the Water Framework Directive  • Like all other public bodies, local authorities must have regard to River Basin Management Plan (RBMP), in this case the Humber RBMP, and any supplementary plans in exercising their functions. For example, they need to reflect River Basin Management Plan (RBMP) data in Local Plan policies and determination of planning applications.  • Local authorities and other public bodies are required to provide information and assistance that the Environment Agency may reasonably seek in connection with its WFD functions.  • Local authorities, along with other public bodies, have a general responsibility not to compromise the achievement of UK compliance with EU Directives, including the WFD. Non compliance could potentially lead to the EU Commission bringing legal proceedings and fines against the UK.  • The Localism Act 2011 includes a new power for UK Government to potentially require public authorities, including local authorities, to make payments in respect of EU financial sanctions if the authority has caused or contributed to non-compliance with EU Directives. In theory, this power applies to infractions of WFD requirements, including deterioration of water body status, though in practice, Government and the Environment Agency would work with a local authority to resolve the situation and avoid penalty payments.  • The Localism Act also sets out the ‘duty to cooperate’, which requires local planning authorities to cooperate on cross-boundary planning issues, including the provision of infrastructure for water supply and water quality, climate change adaptation, conservation and  enhancement of the natural environment.  The above information is taken from the Local Authority Services and the Water Environment – (Executive Summary), Advice Note on the Water Framework Directive for Local Authorities across the Midlands. This document was compiled by the Environment Agency and Sustainability West Midlands (2012). | |
| Emilie Carr  Historic England |  | Question 8 Do we need any other evidence to understand and plan for the environment?  Reference to heritage within paragraph 3.14 is strongly welcomed.  The inclusion of a Heritage Assessment is strongly welcomed. A sound evidence base is of great importance to ensure a sound plan. The evidence base is critical to the preparation of a Local Plan in accordance with paragraphs 10 and 169 of the NPPF. Particularly relevant to site allocations and designations could include the following:-  • Updating conservation area appraisals  • Undertaking characterisation studies  • Producing setting studies – of specific settlements, or specific heritage assets  • Local lists  • Assessments of landscape sensitivity (The Landscape Character Assessment within paragraph 3.11 is noted and welcomed)  The Good Practice Note 1 referenced above provides helpful guidance on this matter. Assessment of non-designated assets should also be included. | |
| Mr Terry Kirby  Leicestershire Local Access Forum |  | There is talk of a lack of green space and leisure facilities across the Borough. We do feel the Open Space Sport and Recreation Study should perhaps differentiate between the more formal provision and the wilder areas and that perhaps more should be made of the Charnwood Forest Regional Park.  We also feel that Green Wedges and Areas of Separation should be given a high profile as it is important that the different communities retain their identities | |
| Mrs Liz Hawkes  Anstey Parish Council |  | No, the above list looks adequate | |
| Mr Phill Bamford  Gladmans Development |  | Question 8 – Environment  6.2.9 As has been set out above in para 6.24 and 6.25, the Council needs to undertake and Environmental Capacity Assessment, along the lines suggested by the LPEG group, to ensure that a robust and justified assessment can be made as to whether the authority can meet its needs in full. The assessment must be detailed enough so that it can be used in the planning balance advocated by the Framework allowing the Council to assess whether the adverse impacts on the various constraints significantly and demonstrably outweigh the benefits of delivering the full need for housing and employment.  6.2.10 In addition, Charnwood has a number of heritage assets upon which development may have a detrimental impact which may not be able to be mitigated. These factors can only be properly assessed through a detailed and robust heritage study.  6.2.11 In light of the judgement in FODC v. SSCLG and Gladman Developments Ltd. [2016] EWHC 421 Admin, Gladman consider it is necessary for the CLP to carry out an assessment of the potential impact of proposed development on heritage assets, as set out in paragraph 129 of the Framework. The Judgement concerns the interaction between paragraph 14 and paragraph 134 of the Framework and the issues of the balancing exercise to be undertaken to assess the harm of any proposals against the benefits of the identified proposed development in accordance with paragraphs 133, 134 and 135 of the Framework. Gladman consider, that the implications of the Judgement apply equally to both the decision making process and the plan making process. Paragraph 134 is clear in talking about ‘development proposals’, a phrase which can apply equally to planning applications and proposed allocations. Furthermore, footnote 29 of the Framework clearly states that “The principles and policies set out in this section apply to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-taking.” It is therefore essential that the implications of the above Judgment are fully considered in the context of both decision-taking and plan-making. | |
| Mrs Sue Coulson  Birstall Parish Council |  | Communities really have a desire for separation and green spaces - not continual corridors of housing | |
| Rick Hoyland  CPRE - Charnwood District |  | Q8 – Environment:  CPRE welcome all evidence which supports protection of the countryside and establishes boundaries to development. | |
| Sean Mahoney  Natural England |  | Thank you for your consultation on the above dated July 2016 which was received by Natural England on 12 July 2016.  Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.  Since its duties relate to the protection and enhancement of the natural environment, Natural England’s concerns relate primarily to safeguarding protected sites, species and landscapes and ensuring adequate green infrastructure provision. It follows that we have no particular comment to make except to advise that development sites should be located so as to avoid any adverse impacts on nationally and internationally designated nature conservation sites.  Natural England considers that there are a number of environmental designations and issues which may affect the size, scale, form and delivery of development sites and should be taken into account. Although the list below is not exhaustive, key environmental considerations include:  • International and national nature conservation sites, including Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites, SSSIs, National Nature Reserves;  • Locally and regionally designated sites for geodiversity and biodiversity;  • UK BAP habitats and significant proportions of BAP or protected species;  • Ancient woodland;  • Landscape character.  We welcome the inclusion of the section entitled Managing the Environment.  Further detailed comments on key themes to assist the Local Authority in site selection are provided below. This information may also be of assistance in the development of policies and options to be delivered through the Local Plan:  Landscape  The Local Authority should take landscape character into account when allocating sites for development. A landscape character approach should be used to underpin and guide decisions on all development and set out criteria based policies for different landscape character areas in order to maintain and enhance local character and distinctiveness. New development should build-in landscape features and reflect the landscape context of the development. Landscape assessments should be undertaken for all proposed site allocations.  Biodiversity  Biodiversity is a core component of sustainable development, underpinning economic development, and has an important role to play in developing locally distinctive and sustainable communities. The Local Authority may find the Nature on the Map website useful to source information on conservation sites and important habitats.  We advise that any development proposals should avoid designated sites, avoid damage to existing biodiversity features, and create opportunities for enhancing biodiversity through the delivery of Local Biodiversity Action Plan (LBAP) targets. LBAPs identify the action required at a local level to deliver UK and regional targets for habitats, species, public awareness and involvement. They also identify targets for other habitats and species of importance in the more local context of their geographical area. Further information about Biodiversity in the UK including details relating to UK BAP priority species and habitats is available.  Natural England does not hold protected species records and therefore cannot advise as to the likelihood of their presence on allocation sites. Information on non-statutory sites and species records may be obtained from your local Wildlife Trust and/or local Environmental Records Centre and such information should be considered when assessing sites for housing development.  Geodiversity  Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development. Local authorities should ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider environment, and maximise opportunities to include geodiversity in and around developments as part of the design process. Further information on geodiversity is available at the following website link - <http://publications.naturalengland.org.uk/category/30050>.  Soils  Early consideration should be given to the quality of soil resource affected by potential development sites and therefore the allocation process provides a useful opportunity to consider soils and to ensure their protection during the plan making process. Local authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local authorities should seek to use areas of poorer quality land in preference to that of a higher quality (NPPF, paragraph 112).  Land quality varies from place to place. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the principles of sustainable development. Further information is available here. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 8  Do we need any other evidence to understand and plan for the environment?  Yes – Local knowledge – liaison with Parish Council and Local Groups with an interest in protecting and maintaining existing green space, village parks and Watermead Country Park. Protection of areas of separation between settlements this side of the Borough. Identification of allotment space if possible. | |
| *Question 9 - Do we need any other evidence to understand and plan for the type, mix and tenure of homes needed?* | | | |
| Mr Geoff Platts  Environment Agency |  | No comments as this topic is outside of my area of expertise. | |
| Mr Terry Kirby  Leicestershire Local Access Forum |  | Communities to thrive must also be balanced and we wonder whether enough has been made of preventing whole areas of Loughborough becoming just student areas. We have heard of instances of problems fuelled by resentment by non student youths in the community. | |
| Ms Ann Irving |  | • Do we need any other evidence to understand and plan for the type, mix and tenure of homes needed?  Yes. How many family homes become under occupied within the first 20 years. About half of all families lose residents when they are 18. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | No, so long as the Housing Needs Assessment is robust. | |
| Mr Phill Bamford  Gladmans Development |  | Question 9 – Housing  6.2.12 The housing mix to be included on a site should be dealt with on a site-by-site basis to ensure that flexibility is maintained in order to deliver the right mix of unit size and tenure to suit the prevailing local circumstances at the time. The needs highlighted in the HEDNA will be a snapshot in time and may not necessarily represent the correct housing mix that is required at the time of any application. Considering housing mix on a site-by-site basis, with reference to the HEDNA, will also allow viability issues to be considered on a similar basis as housing mix often has a considerable impact on a site’s ability to be developed viably. | |
| Mrs Sue Coulson  Birstall Parish Council |  | It would be sensible to assess the need for care homes | |
| Rick Hoyland  CPRE – Charnwood District |  | Q9 – Type, Mix and Tenure of Homes needed:  See also response to Q1 & Q5. Essential to take account of the need for bungalows and affordable homes and ‘The Leicestershire Adult & Social Care Strategy’. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 9  Do we need any other evidence to understand and plan for the type mix and tenure of homes needed:  Yes – again consideration of local knowledge and demand – there is a demand for larger family homes. Also consideration of the type of tenure as crime has risen significantly within the Checkland Road estate which is predominantly consisting of social housing. | |
| *Question 10 - Do we need any other evidence to understand and plan for the economy?* | | | |
| Mr Geoff Platts  Environment Agency |  | Evidence in respect of the Grand Union Canal and the River Soar Strategy is an important requirement. This Agency and partners are currently looking at ways to reduce the flood risk to Loughborough. Further information on this work can be obtained from my colleague Vikki Candlish on tel no 02030253547. | |
| Ms Ann Irving |  | • Do we need any other evidence to understand and plan for the economy?  Yes – solo and DIY non-office based small businesses and a recognition of rural areas where small business is content to earn from local contracts. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | No, the list looks adequate | |
| Grant Butterworth  Leicester City Council |  | Question 10  Strategic Warehousing Provision  a) With regard to strategic warehousing provision, the report by “MDS Transmodal & Savills” (the Leicester and Leicestershire Strategic Distribution Sector Study 2014 ; approved by the Strategic Planning Group) confirms that there is a need for a second strategic rail freight interchange in the county, to supply the 52% of the total market demand required to be served by rail. (It is noted that since then, the market has only brought forward road based sites, which presently make up 48% of the identified demand). Rail provision is an important sustainable option which needs to be prioritised. The report identified only three key areas of opportunity for these, due to the limited areas served by adequate rail infrastructure (i.e. with an appropriate gauge width over “W9”). It is assumed that (as with the other authorities), this issue has been considered.  b) The report also confirms that in the HMA there are 89 existing strategic warehouses (i.e. over 9,000sqm each) totalling 2.25million sqm, on around 382ha of land. (See section 2.3 and table 4.3 in part A of the MDS report). Only 90ha of this (i.e. less than a quarter) was forecast likely to be used for “on site-redevelopment” over the report period. Therefore consideration of the development potential of ¾ of this land will need be addressed within Local Plan, in terms of possibly redeveloping for an alternative use, or retention within the employment land supply.  The above report identified the need to assess the existing strategic warehouses in your area, to forecast in more detail the likely remaining lifespan ie opportunities for the reuse of existing buildings and facilities. Background Data Assumptions (applying a range of 2 possible densities based on industry practice) The “MDS Transmodal & Savills” report confirms:  Around 146,000sqm of strategic employment warehousing exists in Charnwood:-  - Assuming a density of 5000sqm floorspace/ha = 29ha of land, where re-use not addressed.  - Assuming a density of 4000/ha = 36.5ha of land, where re-use not addressed. | |
| Mrs Sue Coulson  Birstall Parish Council |  | There is a need for regeneration of shopping in local communities to avoid unnecessary travel | |
| Rick Hoyland  CPRE - Charnwood District |  | Q10 – Economy:  Evidence must consider the effect on preserving countryside and resisting coalescence between settlements. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 10  Do we need any other evidence to understand and plan for the economy?  Watermead Regeneration Corridor Masterplan is a fantastic opportunity with plenty of opportunities for the improvement and regeneration of areas in Thurmaston, opening up the park to the village, improving parking and access to the park. | |
| *Question 11 - Do we need any other evidence to understand and plan for the community facilities and services needed?* | | | |
| Mr Geoff Platts  Environment Agency |  | No comments as this topic is outside of my area of expertise. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | We need sound evidence of service centre requirements. | |
| Mr Phill Bamford  Gladmans Development |  | Question 11 – Community Facilities and Services  6.2.13 As stated previously, Para 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential therefore, that the needs of the sustainable rural settlements across the district are assessed and a meaningful level of growth apportioned to them. The update to the Charnwood Settlement Hierarchy Assessment therefore needs to carefully consider the guidance set out in para 55 of the Framework and be detailed enough to fully understand the needs of the smaller settlements so that growth can be apportioned to them to ensure their on-going vitality and viability. | |
| Mrs Sue Coulson  Birstall Parish Council |  | There needs to be some thought in preventing large numbers of the same shops in a community, i.e. beauticians, tattoo parlours, hairdressers, charity shops. | |
| Rick Hoyland  CPRE - Charnwood District |  | Q11 – Community Facilities & Services:  Evidence should take account of the provisions of established or emerging Neighbourhood Plans. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 11  Do we need other evidence to understand and plan for the community facilities and services needed?  Yes: consultation with the Parish Council, local knowledge of facilities and services available. Previous surveys conducted by independent consultants commissioned by the Borough Council have not consulted with the community and have been highly inaccurate. | |
| *Question 12 - Do we need any other evidence to understand and plan for infrastructure delivery?* | | | |
| Mr Geoff Platts  Environment Agency |  | Agree with the proposed evidence base. | |
| Mrs Liz Hawkes  Anstey Parish Council |  | No | |
| Grant Butterworth  Leicester City Council |  | Question 12  There is a need to ensure early and appropriate discussions with neighbouring authorities on cross-boundary infrastructure, especially regarding transport and education. | |
| Mr Phill Bamford  Gladmans Developmen | t | Question 12 – Infrastructure  6.2.14 The Delivery and Infrastructure needs of the district need to be justified and based on robust evidence. It is important therefore, for the evidence base to properly assess the viability of the requirements for affordable housing and infrastructure set out in the CLP and Infrastructure Development Plan to ensure consistency with paragraphs 173 and 174 of the Framework.  6.2.15 Plans should be deliverable and sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Therefore, the Council should assess the likely cumulative impacts on development in their area of all existing and proposed local standards and policies through a comprehensive and robust Whole Plan Viability Assessment to ensure that the cumulative impact of these standards and policies do not put the implementation of the Plan at serious risk. | |
| Mrs Sue Coulson  Birstall Parish Council |  | More consideration given to building by-passes from s.106 monies to improve the quality of life for communities | |
| Rick Hoyland  CPRE - Charnwood District |  | Q12 – Infrastructure Delivery:  See answer to Q5 re Leicester to Burton rail line. Consider evidence from established and emerging Neighbourhood Plans.  Review capacity of drainage and water supply services, schools and healthcare provision etc. | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 12  Do we need any other evidence to understand and plan for infrastructure delivery?  Yes realistic assessment of traffic and facilities – consultation with the Parish Council local groups.  A problem we can envisage with the larger SUE’s is a serious strain on existing infrastructure, transport and services as they will not be increased in the developing areas until long after a new community has been formed. Additionally, resulting in a diluted and fragmented society, weakening community cohesion. | |
| *Question 13 - Do we need any other evidence to monitor and respond to a lack of delivery?* | | | |
| Mr Geoff Platts  Environment Agency |  | Agree | |
| Ms Ann Irving |  | • Do we need any other evidence to monitor and respond to a lack of delivery?  I simply do not believe that the gap between permission and completion is real. Permission should have a tighter time limit and no return for a revised plan to simply keep it running. | |
| Mr Phill Bamford  Gladmans Development |  | Question 13 – Monitoring  6.2.16 In terms of monitoring, it is essential that the Council understands the full range of reasons behind any lack of delivery so that it is able to respond accordingly. A developer panel which meets regularly to update the Council on commercial matters would assist greatly in providing this understanding.  6.2.17 It is also suggested that any policies on monitoring should include triggers which set out when the Council consider delivery rates to be falling short and what level of shortfall is required before a specific action to remedy the issue is taken.  6.2.18 The type of triggers that could be included are where delivery in any one year falls to below 80% of the housing requirement or where the housing land supply situation falls to below 5.25 years then the Council would seek to take action. These types of triggers would allow the Council to address any potential shortfall in delivery early, before the housing land supply drops below 5 years and the LPA loses an element of control over development as a result of Paragraph 14 of the Framework. | |
| Mrs Sue Coulson  Birstall Parish Council |  | Local Council's could monitor delivery in their own areas | |
| Rick Hoyland  CPRE - Charnwood District |  | Q13 – Monitoring & Responding to Lack of Delivery:  ‘Soft Market Testing’. Unacceptable ‘geek speak’ - what is it? | |
| Tracey Kunne  Thurmaston Parish Council |  | Question 13  Do we need any other evidence to monitor and respond to a lack of delivery?  Yes – monitoring on-going and surveys repeated regularly. | |
| *Question 14 - Should the Core Strategy Vision to 2028 continue for the period to 2036?* | | | |
| Mr Geoff Platts  Environment Agency |  | | I think the Core Strategy Vision should continue to 2036. |
| Ms Ann Irving |  | | • Should the Core Strategy Vision to 2028 continue for the period to 2036?  • Yes. There is so much work involved that a longer look makes sense. |
| Taylor Wimpey | Mr James Yeoman  Savills | | Question 3 – Should the strategy be continued to 2036? & Question 14 – Should the Core Strategy Vision to 2028 continue for the period to 2036?  The Strategy summarised within the CLP – Regulation 18 document (paragraph 2.8) remains relevant, in so far as the pressures that are faced in delivering development (e.g. housing need, environmental constraint). However, the growth strategy should be informed by the objectively assessed needs identified for the Charnwood Borough in the plan period. Accordingly, the quantum of housing and employment growth should be updated.  In turn the spatial strategy (paragraph 2.5) will also need to be re-assessed. The growth locations identified to deliver Sustainable Urban Extensions will still be subject to development throughout the current Core Strategy period (2011-2028) and potentially beyond. Alternative growth locations, based on principle of sustainable development, will need to be identified. In this regard, the Strategy will need updating. |
| Mr Phill Bamford  Gladmans Development |  | | Question 14 – Core Strategy Vision  6.2.19 The Core Strategy Vision should be reviewed to ensure it is still fit for purpose before it is extended to 2036. This can only be known fully once the evidence base has been completed. The CLP should also be mindful of the fact that the Strategic Growth Plan will cover the period to 2050 and therefore the Plan needs to set the building blocks for delivering the aims and objectives of the Strategic Growth Plan beyond 2036. This should be reflected within the Vision going forward. |
| Mrs Sue Coulson  Birstall Parish Council |  | | Yes but with flexibility and review |
| Rick Hoyland  CPRE - Charnwood District |  | | Q14 – Continue Core Strategy vision to 2036?  See answer to Q3 & Q4 and take account of ‘Strategic Growth Plan for Leicestershire’. |
| Tracey Kunne  Thurmaston Parish Council |  | | Question 14  Should the Core Strategy Vision to 2008 continue for the period to 2036?  Yes with careful monitoring and regular updates.  Consideration to be given to by community cohesion, in our ever increasing multi-cultural society – working towards a society in which there is a sense of belonging by all communities. |