From: Gary Freer [redacted]
Sent: 15 August 2021 20:17
To: localplans@charnwood.gov.uk
Subject: Charnwood's Local Plan 2021-2037 (pre-submission draft) Consultation

Responding to the above, I offer the following suggestions:

[1] The National Planning Policy Framework requires that local authorities tackle climate change. Charnwood's local plan does not adequately do this at present. Given the urgency of the situation, the following are needed and should be introduced into the plan as policy:

a) Any new development needs to be carbon-zero and be fit to live and work in as the climate crisis intensifies.

b) Local renewable energy generation needs to be prioritised in order to decarbonise the UK and to ensure power security as we replace fossil fuels with renewable forms of energy.

[2] Where climate change policies exist in the plan, they tend to be weak. Phrases such as "we will encourage....." and "we support...." need to be replaced with a stronger "we will require....." and "planning permission will only be granted if.....".

[3] Policy CC3, on renewable and low-carbon energy installations, only offers support for small and medium-sized wind turbines. Larger ones are more energy-efficient and Charnwood Borough Council have already identified areas where large and very large turbines could be sited. Therefore, development areas should be allocated for the larger type.

[4] Policy CC4, on sustainable construction, lacks requirements for energy efficiency and high levels of insulation in new buildings. It currently requires design and layout which would allow for future low-carbon energy generation but this ought to be incorporated from the start. Adding it later is more expensive, time-consuming and carbon-emitting.

[5] Policy CC5, on sustainable transport, should require the design of new housing developments to facilitate a substantial shift away from car-use to active and public transport and require evidence that there is good reason to expect that the design will achieve this.

[6] Policy PT3, on car-parking standards, will result in additional car use and undermine any attempted shift to more sustainable transport options. Instead, this policy should require all new developments to include measures that actively discourage car use.

[7] Page 157 refers to a sequential test for logistics development. This local plan barely mentions freight transport but it needs to include a policy requiring logistics development to be near, to use and to support the development of freight train lines. This ought to be reflected in the sequential test.

Thanks for reading. I trust that these suggestions will be heeded and acted upon.

Yours sincerely,

Gary Freer
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