From: David Waymont [redacted]
Sent: 20 August 2021 18:00
To: localplans@charnwood.gov.uk
Subject: Charnwood Local Plan 2021-37
Attachments: e-mail submission.pdf

Please find attached my submission relating to the Plan

Regards,

Dave Waymont

Charnwood	**Charnwood Local Plan 2021-2037** Publication Stage Representation Form	**Ref:** **(For official use only)**

Please return to Charnwood Borough Council by 5PM on 23rd August 2021 by:

- **Email: localplans@charnwood.gov.uk**
- **Post: Local Plans, Charnwood Borough Council Southfield Road, Loughborough, LE11 2TX**

The Privacy Statement can be found at: www.charnwood.gov.uk/privacy

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
Title	Mr	
First Name	David	
Last Name	Waymont	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
Line 2	[redacted]	
Line 3		
Line 4	[redacted]	
Post Code	[redacted]	
Telephone Number	[redacted]	
E-mail Address (where relevant)	[redacted]	

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	DS1 and DS3	Policies Map	

4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	✓	No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes	✓	No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Charnwood Local Plan 2021-37

I have submitted comments about the Charnwood Local Plan 2021-2037 online and have written this to add my general thoughts on the Plan.

I am a resident of Loughborough and I object to the housing developments in Loughborough that contradict the Plan's own policies.

In particular areas that I am familiar with have housing developments HA15, HA16 and HA17 proposed (part of Policy DS3) These sites contradict Policy DS1 in the following ways:

1) They don't protect the intrinsic nature of the countryside
2) They don't maintain the functions of Green Wedges and Areas of Local Separation. HA15 for instance means that Loughborough and Quorn are barely separated.
3) They don't safeguard and deliver a net gain in biodiversity

These sites also contradict part of Policy EV1:

1) They don't protect environmental resources including local air quality and the most versatile agricultural land. These three sites have areas of grade 2 and 3 agricultural land

These sites also contradict part of Policy EV4:

1) They don't protect and enhance the biodiversity of the Charnwood Forest Regional Park.
   The map on Page 179 of the Plan shows the Charnwood Forest Regional Park coming up to the current south west edge of the Loughborough urban area.

This is in line with other maps of the Regional Park. Yet HA15, 16 and 17 extend into the Regional Park and there will be negative biodiversity impact on these areas.
Incidentally the map on Page 23 of the Plan seems to have redefined where the Park boundary is.

These sites contradict Policy EV6:

1) Almost all the points in this policy are contradicted by these sites:

   The Plan says that development will be supported which:
   "protects and enhances national and local priority habitats and species; • protects and enhances irreplaceable habitats including trees, veteran trees and ancient woodland; • protects and enhances biodiversity networks, including strategically important links in the wildlife network between our most valuable habitats; • supports nature recovery particularly in areas which have protected species and priority habitats; • protects features of geodiversity value and enhances their interpretation; • ensures biodiversity and geodiversity are maintained during construction;"

   All these points are undermined by the three sites HA15,16 and 17.

These three sites also contradict the following parts of Policy LUC1:

1) They don't provide urban form which integrates with the wider landscape setting and responds positively to the relevant local landscape character area of Charnwood Forest, Soar Valley or Langley Lowlands, in accordance with Policy EV1
2) They don't protect the predominantly open and undeveloped character of Areas of Local Separation in accordance with Policy EV3
3) They don't protect and enhance the Charnwood Forest and River Soar and the strategically important links in the wildlife networks which connect them, in accordance with Policy EV6

As evidence for my objections I refer to the Sustainability Assessment Report (SAR) which identified a number of sustainability issues during the scoping process. Namely existing pressure on landscape character and condition, declining tranquillity surrounding Loughborough (amongst other areas), loss and fragmentation of habitats. The SAR also highlighted other pressures that applied to the Charnwood area as a whole which also apply to Loughborough.
There are several areas of the SAR that rank the Loughborough Development part of the Plan as having a minor negative effect even with the Plan's mitigation. These were:

1) landscape character
2) significant negative effect on loss of agricultural land
3) air quality
4) only a neutral effect on biodiversity even with mitigation and with the Plan's Policy of increasing biodiversity

The conclusion from the SAR is that even if the mitigations are implemented thoroughly and in full (which cannot always be guaranteed) the situation will be worse than it currently is.
The SAR also concluded that "there may be a need for additional health care to support an increase in 2,079 dwellings for Loughborough (beyond committed development). It is presumed that contributions will support enhancements, but it is unclear how these would be applied (i.e. expansion to existing surgeries / satellite facilities / new facilities)"

This lack of clarity needs to be addressed now and action taken now as access to health care is currently difficult (too many patients on surgery books or too few doctors) and there are still 3,000 plus houses to be built on the Garendon Estate.
In summary I object to the Charnwood Local Plan 2021-37 as it seems to be focused on improving the Charnwood economy at the expense of Loughborough residents who end up with a negative impact on the quality of their environment.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make the Plan sound needs adequate notice and mitigation to the Sustainability Assessment report such that all elements are at least neutral.

(Continue on a separate sheet /expand box if necessary)

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Signature: [redacted] Date: 20/8/21