From: Haidee Johnson [redacted]
Sent: 20 August 2021 17:08
To: localplans@charnwood.gov.uk
Subject: Response in respect to Charnwood Borough Council Draft Local Plan
Attachments: Response in respect to CBC Local Plan Final.pdf

Please see attached response in respect to Charnwood Borough Council Draft Local Plan.

Kind regards

[redacted]

Response in respect to Charnwood Borough Council (CBC) Local Plan

In recent years Charnwood Borough Council (CBC) have approved numerous planning applications along the Blackbrook (Tickow Lane/Oakley Road). These applications included supporting documents and drainage designs but failed to include how water would be controlled and managed on the other side of the M1 motorway. All the reports stopped short of this point, possibly knowing that by going further they would have encountered a problem due to the potential impact on Shepshed Watermill, which is grade 2 listed and located directly adjacent the M1. It is therefore considered that the inclusion of the Mill within any runoff calculations would have likely had significant impact on the deliverability of these approved schemes. CBC have been contacted on many occasions regarding this matter, but as yet, no response has been received to the concerns raised and this locally important listed building has never been included within any of the studies and impact assessments carried out.

Further-more the proposed Sustainable Urban Extension (SUE) on the Garendon Estate shows extensive water balancing ponds / wet woodlands. The provision of these features within an area already at risk to flooding needs careful calculation so as not to impact Shepshed Watermill further as by slowing the flow/changing the levels/backing up the water upstream this could have a significant effect on the outflow from the culvert and again increase the potential of flooding at the Mill.

In 2017, Severn Trent surveyed the mill pond, which is supplied via the Blackbrook from Blackbrook Reservoir and they provided the Mill with a CAD drawing showing the difference in level from the weir to the bank, which was as little as 30-40mm. Therefore, with this in mind, any increase in water levels caused by new developments upstream would have a considerable impact on the Mill. Shepshed Watermill continually monitors water levels and makes adjustments to the level of the mill pond to not only take account of periods of heavy rainfall but also when Blackbrook Reservoir release large volumes of water downstream from time to time. There is a very fine balance for controlling this and therefore any additional increase in run off upstream and/or backing up of water downstream would potentially put this property at risk.

In 2018 the Environment Agency took water samples and informed the Mill that the mill pond was high in nitrates and a common cause for this would be raw sewage entering the water course. It is understood that on Tickow Lane at the end of Anson Road there is an overflow holding tank which is already often at capacity and could be the reason for high nitrate readings. These high readings are detrimental for the biodiversity of the Blackbrook and raise significant concerns about the effect on the native species in the mill pond and Blackbrook as a whole, particularly with respect to the white claw crayfish, brook lamprey, kingfishers and otters, to name but a few, which have been identified at the Mill site. The proposals to build yet more housing developments along Tickow Lane/Oakley Road will therefore only further exacerbate current drainage, flooding and biodiversity concerns as well as affecting the general landscape character of the area and local heritage assets. English Heritage have also been made aware of these concerns.

In reference to item 8.62 of CBC Local Plan (extract below),

> 8.62. We also have more than 200 locally listed buildings, which are non-designated heritage assets of historic or architectural interest identified for their contribution to our local environment and heritage. Neighbourhood plans provide an opportunity for local communities to identify and protect local heritage assets which are of importance to their local community.

Mill Farm/Shepshed Watermill, as previously mentioned, is one of these locally listed buildings with a grade 2 listing. More than being just a listed building of architectural merit it is also a property of important historic interest, as it was the grinding mill and saw mill for the Garendon estate, plus the site itself is recorded as being a Watermill as far back as the Domesday Book of 1066. The Watermill has been respectfully renovated and brought back into working order over the past 25 years by the current owners and opened to the public. These open days allow the local community and visitors from further afield an opportunity to experience the beauty and learn a little history of the site.

As there is currently no Neighbourhood plan how are heritage assets of importance to their local community to be protected.

Item 8.63 of CBC Local Plan (extract below)

> 8.63. We accept that to fully appreciate our heritage assets it is important we ensure that their setting is respected. This may include a variety of views of the asset and its surroundings, and we will seek to ensure that they are not compromised by inappropriate or unsympathetic development.

states that a heritage asset 'setting is respected' which includes the 'views of the asset and its surroundings'. CBC also state that they will seek to ensure that heritage assests are not compromised by inappropriate or unsympathetic development'. This is clearly not the case as CBC have raised no objection to the introduction of a large road junction directly opposite the grade 2 listed property of Mill Farm/Shepshed Watermill. It should also be noted that this property is also a working livery yard with horses accessing Hathern Road at this point, which raises further concerns in respect road safety. Not only is a large road junction proposed which directly affects the property but also an employment area, a travellers site and a showmans site are also proposed in the field opposite, which will be wholly inappropriate to the setting of this listed building and also that of the neighboring Grade 2 thatched property Oakley Wood Cottage on Hathern Road (within the boundary of North West Leicestershire).

There are numerous instances within Appendix 1 – Monitoring of the Local Plan where 'no target' is attributed. What use is this. If there is no target it is open to misuse and merely allows anything to be acceptable.

CBC acknowledges the importance of equine businesses and refers to the valuable contribution keeping horses are to the Boroughs economy see item 5.40 below.

Equine Businesses

> 5.40. The keeping of horses in the Borough makes a valuable contribution to our countryside and the rural economy. We will support the development of our horse related industry which provides opportunities for leisure, tourism and farm diversification along with the related farriery, saddlery, feed trades and specialist equine veterinary services. New development proposals of this nature will however need careful consideration in terms of their impact on the character and appearance of the countryside.

However, there is little protection or assistance being offered to existing equine businesses and very little that enhances the facilities for horse riders. For instance due to the SUE on Garendon estate a thriving Livery yard and long term tenant of the estate has been lost. Other local horse owners including Mill Farm Liveries on Hathern Road are now faced with increased development and increased levels of fast moving traffic leading to concerns over road safety not only for local horse riders but also local cyclists who use the same routes.

As more development is proposed and the road system gets busier more emphasis must be placed on multiuser routes instead of segregating routes for different uses, as this will open up the off road network to more individuals and better link areas together, which will in turn improve traffic safety and flow. The British Horse Society, Sustrans and large companies are working together on many projects across the Country to promote multiuser routes – see one example of this below.

Working together for all

The BHS routinely works with other organisations to promote safe and responsible use of roads, byways and bridleways, so we were pleased recently to be invited to support an initiative to install 'Share the Trail' signs on

The introduction and reclassification or more multiuser routes would be of considerable benefit to local areas experiencing high levels of development. The new Local Plan provides the ideal opportunity to be forward thinking and place more emphasis on shared routes thus futureproofing accessibility for years to come. Increase in these routes would also have the added health benefit of encouraging more individuals to safely access the countryside via a better network of routes.

Supporting document Green Wedge Urban Fringe Infrastructure Enhancement Zones (March 2016) states what is recommended across the Borough. Item GIEZ4 for example, specifically states that the Public Right of Way network needs to be enhanced (see below).

GIEZ-4	Urban Fringe Green Infrastructure Enhancement Zone	This area is recommended for designation. Enhancement should focus on: • Improving accessibility to the countryside along the edges of Shepshed and Loughborough. • Strengthening the existing PRoW network. • Strengthening the environmental and recreational role of linear features such as Black Brook and the Charnwood Forest Railway. • Enhancing the acknowledgement and appeal of heritage assets within Garendon Park.

CBC should therefore have some targets which ensures that this happens. A masterplan for the Borough which indicates how areas can be efficiently and safely linked by means of multiuser routes would be beneficial.

Areas of Local separation - item 8.18 states 'the policy has maintained the character and identity of individual settlements and prevented their coalescence' for instance between Loughborough and

Hathern but there would appear to be no local separation offered between other areas such as Loughborough and Shepshed. Why are some areas not offered the same separation rights as other areas. For residents of Shepshed the impression is that CBC are not concerned about Shepshed losing their identity and being absorbed by Loughborough. This is not the case Shepshed residents want to retain their identity in the same way afforded to other settlements.

More consideration needs to be given to water run-off, flooding, wildlife corridors and enhancing habitats which are being affected by the continued development in the area, with specific targets attached, as unfortunately with these developments comes the increased loss of open countryside and agricultural land that currently supports the wildlife and allows rainwater to soakaway and dissipate more naturally and slowly. The effect of the developments commenced to date on both flooding and biodiversity is already being felt and robust calculations and assessment targets are therefore essential so as not to have a detrimental impact on the Borough that cannot later be undone. To date there would appear to be a lack of sufficient data with respect to the developments around Shepshed and the proposed SUE at Loughborough.

Development design across the Borough does not appear to be equal with some developments given less aesthetic consideration than others. For instance the development at Wymeswold which is included on page 70 of the Local Plan (see below) is very appealing with a picturesque village feel however other developments such as Kingsgate in Shepshed is cramped and has an uninspiring design with poor (if any) detailing on house types, no appealing street scene, green frontages or trees within the development (except for the land which fronts Hathern Road and could not be built on due to the potential risk of flooding. Quality of design and building materials need to be consistent across the Boroughs developments with good design and build finish not just isolated to cherry picked areas.

There also needs to be a targeted increase in health services locally where new developments are proposed, as access to Doctors Surgeries is getting increasingly difficult. This can also be said for other local services such as access to appropriate leisure facilities. Many areas which are facing high levels of development (Shepshed again being one) have very few facilities and limited local access.

Those areas across the Borough which are facing major development need to receive proportionate facilities, a safe and effective road network, flooding protection, increased multiuser routes, biodiversity/wildlife enhancement, protection of recognized historic assets/listed buildings and general good development design to allow areas to thrive.

Mill Farm/Shepshed Watermill/Mill Farm Liveries (19/08/21)