WHICH POLICY	WHICH POLICY MAP	WHICH DIAGRAM	WHICH TABLE	WHY PLAN NOT SOUND	MODIFICATIONS	HEARINGS	HEARING SESSIONS
				oughborough Football Club does not believe that the proposed local plan is legally compliant in relation to paragraph ES5 – Employment and at ishley range. This does not comply with paragraphs 93 and 99 of the National Planning Policy Framework (NPPF). Paragraph 93 of the NPPF states "plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments. Paragraph ES5 will remove a community sports facility (oughborough Football Club ground) and replace it with Employment land – there is nothing in the local plan to suggest it will be replaced. The local plan is further non-compliant with paragraph 99 of the NPPF: Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or 43 This includes transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres. 29 b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or In relation to part a) The oughborough Football Club ground is clearly not surplus to requirements (see CBC Playing Pitch Strategy 2018). There is no provision in the local plan to accommodate NPPF 93 b) and related planning applications have not proposed "equivalent or better provision". Paragraph ES5 is not sound because it directly contradicts CBC policy of "Community Protections for existing facilities promoting healthy communities, open space, sport and recreation." According to CBC Open Spaces Strategy 2019, all existing playing pitches (including the oughborough Football Club ground which falls in ES5) were to be retained. The strategy states: " erby Road Playing Fields: Poor-quality ancillary facilities. Replace ancillary facilities with FF specification compliant changing facilities." This would not be practical if oughborough's main community football stadium was converted to industrial land as the remaining land at erby Road Playing Fields falls within a protected flood alleviation area. It is not justified because it is not reasonable or lawful to build on oughborough Football Club's ground without plans to replace it, nor is it appropriate to build a warehouse on the land and relocate the football ground when the warehouse could be built on any proposed new site. ES5 will not be effective because the plan to build on the oughborough Football Club ground is not deliverable over the plan period. A similar proposal was in the previous CBC local plan and was not deliverable in that period – there is no evidence to suggest that socio-economic factors have improved enough to make this practical. Speculative planning applications from developers talk about building to "demand" – there is no evidence of any demand for this employment land which could not be accommodated elsewhere in the local plan's employment allocations. Charnwood Borough Council has failed in it's duty to co-operate as it has neglected to consult with oughborough Football Club, oughborough Rugby Club, The Charnwood olf Range, Thorpe Acre FC, Thorpe Acre Sunday FC, FC Poplar And oughborough ions Juniors FC – all who are directly impacted by the proposal to convert The rome into employment land. CBC made a commitment to consult stakeholders (which would include oughborough Football Club) as well as "A general A4 site notice poster will be placed adjoining each proposed housing and employment allocation. Poster will set out that an allocation		Yes	The case to retain the oughborough Football Club ground is highly emotive in the community - in-person representation is absolutely vital to ensure that CBC meets it s statutory obligations around consultation and engagement.

Loughborough Football Club does not believe that the proposed local plan is legally compliant in relation to paragraph ES5 – Employment Land at Dishley Grange. This does not comply with paragraphs 93 and 99 of the National Planning Policy Framework (NPPF). Paragraph 93 of the NPPF states "plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments. Paragraph ES5 will remove a community sports facility (Loughborough Football Club ground) and replace it with Employment land – there is nothing in the local plan to suggest it will be replaced.

The local plan is further non-compliant with paragraph 99 of the NPPF:

> **Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:**
>
> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or 43 This includes transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres. 29
>
> b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

In relation to part a) The Loughborough Football Club ground is clearly not surplus to requirements (see CBC Playing Pitch Strategy 2018). There is no provision in the local plan to accommodate NPPF 93 b) and related planning applications have not proposed "equivalent or better provision".

Paragraph ES5 is not sound because it directly contradicts CBC policy of "Community Protections for existing facilities promoting healthy communities, open space, sport and recreation."

According to CBC Open Spaces Strategy 2019, all existing playing pitches (including the Loughborough Football Club ground which falls in ES5) were to be retained. The strategy states: "Derby Road Playing Fields: Poor-quality ancillary facilities. Replace ancillary facilities with FF specification compliant changing facilities." This would not be practical if Loughborough's main community football stadium was converted to industrial land as the remaining land at Derby Road Playing Fields falls within a protected flood alleviation area.

It is not justified because it is not reasonable or lawful to build on Loughborough Football Club's ground without plans to replace it, nor is it appropriate to build a warehouse on the land and relocate the football ground when the warehouse could be built on any proposed new site.

ES5 will not be effective because the plan to build on the Loughborough Football Club ground is not deliverable over the plan period. A similar proposal was in the previous CBC local plan and was not deliverable in that period – there is no evidence to suggest that socio-economic factors have improved enough to make this practical. Speculative planning applications from developers talk about building to "demand" – there is no evidence of any demand for this employment land which could not be accommodated elsewhere in the local plan's employment allocations.

Charnwood Borough Council has failed in it's duty to co-operate as it has neglected to consult with Loughborough Football Club, Loughborough Rugby Club, The Charnwood Golf Range, Thorpe Acre FC, Thorpe Acre Sunday FC, FC Poplar And Loughborough Lions Juniors FC – all who are directly

impacted by the proposal to convert The Drome into employment land. CBC made a commitment to consult stakeholders (which would include Loughborough Football Club) as well as “A general A4 site notice poster will be placed adjoining each proposed housing and employment allocation. Poster will set out that an allocation is nearby and that more details can be found online.” CBC has not consulted with Loughborough FC and no posters were ever displayed.

To make ES5 legally compliant (in line with NPPF paragraph 99) CBC should remove the area of Loughborough Football Club’s ground from the employment allocation and retain it as a sports ground along with the rest of Derby Road Playing Fields.

To make ES5 sound, CBC should abide by it’s policies laid out in the Playing Pitch Strategy 2018 and the Open Spaces Strategy 2019 – remove the Loughborough Football Club ground from ES5. As there is no mention in the local plan of where the football club would be relocated to (as per NPPF paragraph 99) the employment allocation currently suggested for Derby Road Playing Fields should move to wherever the proposed relocation would be.