

FULL NAME	ORG DETAILS	EXAM DOC REF	REPRESENTATION SUMMARY	RESPONSE	LOCAL PLAN MODIFICATION (if required)	OTHER LP REF
A L Tomalin	N/A	N/A	Concerned about traffic impacts on Hazel Road resulting from development at Sites HA15, HA16 and HA17.	The Borough-wide, plan-making evidence commissioned to support the Local Plan does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan.		HA15/ HA16/ HA17
Andy Warner	N/A	N/A	Concerned about assessment of traffic impacts resulting from development of Sites HA15, HA16 and HA17.	The Borough-wide, plan-making evidence commissioned to support the Local Plan does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan.		
Anstey Parish Council	Anstey Parish Council	EXAM 75	Detailed response approved by Parish Council. Various comments regarding transport plans as they will affect Anstey. EXAM75 contains insufficient detail on the impact of the highway network. Lack of detail on funding. Significant changes in travel behaviour will be required if the impact on the transport networks is to be reduced significantly. Plan is not considered sound due to lack of sufficient detail on the local road network around Anstey.	The Strategies identified in EXAM 75 are based upon a substantial amount of transport evidence work which has been undertaken to support the Local Plan (EB/TR/1 to TR/13 and EXAM 31). This has been confirmed as fit for purpose (EXAM 19) and provides the necessary information to understand the pressures on the highway network and to identify the impacts Local Plan growth could have on the network by 2037 and to define the overall Borough/Plan wide mitigation package. A primary purpose of the Strategies is to address cumulative and cross-boundary transport impacts of growth both within and external to the Borough. EXAM 75 (para 2.4) recognises the importance of changes in people's behaviour to lessen the impacts on the transport system. The transport evidence we have developed provides a proportionate view of transport mitigation requirements to support the delivery of the Plan. It would not be feasible through Borough-wide, plan-making evidence to consider local road networks in detail and develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified.		
	Arelion	N/A	Representation relates to electricity supply but is not focussed on any specific consultation document.	Infrastructure was considered under Matter 8 and the representation does not relate to documents under consultation. The Council does not have any comments.		

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	Avison Young for Jelson Homes	EXAM56A	EXAM56A – The Local Plan will have a plan period of 12 years if it is adopted in 2024/2025 monitoring year which is not consistent with NPPF paragraph 22 and is therefore unsound. EXAM56A is therefore based upon an incorrect assumption of the overall housing requirement and the requirement should be increased to either 23,558 or 24851 homes because the plan period needs to be extended to include 2039 or 2040. Only one site in the plan is shown as delivering past 2037 and so new sites will be needed.	The plan period was the subject of discussion as part of Matter 1. The Council's written statements can be found in response to Q1.21 of the original statement and Q1.3 of the supplementary statement.		
	Avison Young for Jelson Homes	EXAM58b/c/d/e	EXAM58b includes incorrect completions data for 2021/22 and 2022/23 when compared with data from Government Live tables which tracks completions from new builds, conversions and changes of use. The trajectory includes a list of sites which do not include clear evidence that they will be delivered in the 5 year plan period that is being assessed. The trajectory includes assumptions about delivery rates for Sustainable Urban Extensions which are over optimistic. The Council does not say in the introduction to EXAM58(d) which is its preferred method for dealing with past undersupply. If the Council is seeking to confirm its 5 year supply of deliverable housing land through the adoption of the local plan then it should apply a buffer of 10%. The Council can only demonstrate a 4 year supply of deliverable housing based on a reasonable application of the term deliverable and if correct completions data is used.	The completions data provided in EXAM 58B include both the net additions set out in Government Table 122 and communal accommodation (adjusted by the appropriate multiplier) set out in Table 124 and are correct. The housing land supply position and the evidence supporting it were considered as part of Matter 7. Other comments are noted.		
	Avison Young for Jelson Homes	EXAM 76	EXAM76 only appears to have considered costs related to education and to transport. It is not appropriate for developers to be asked for exactly the same contribution towards infrastructure where the capacity of existing infrastructure varies from location to location – this lack of understanding may mean that the plan as a whole is not deliverable. If site by site analysis is done for each allocation to see whether contributions satisfy the CIL Regulations 122, there is concern that a number of allocations will be unviable and the site undeliverable. The Draft Strategies assume that contributions are based on 3 areas whereas the Viability Study assumes that contributions will be calculated on a borough wide level. The costs calculated by LCC do not include costs for enhanced bus services. The Transport Strategies are being prepared and costs may be an under estimate. It should be possible to attribute costs for walking and cycling and other transport infrastructure to specific schemes and a way of implementing this at the Development Management stage needs to be found. The viability assessment is not demonstrating that the Local Plan is deliverable because it assumes that all developers of allocations maximise contributions and significant amounts of public sector funding are secured. For the Plan to be found sound it means that focussing development in locations that place less pressure on existing infrastructure, accepting less infrastructure, accepting less affordable housing from allocated sites and finding additional sites.	The purpose of the viability assessment is to test the viability of the whole plan. It is based on typologies of sites, which reflect the range of sites allocated in the plan; therefore, it serves a different purpose to detailed viability work to inform specific land development projects. While it is informed by the range of infrastructure which is required to deliver the plan and has regard to the full range of policy requirements it will be during the determination of planning applications that the impacts of developments will be fully addressed and Section 106 agreements put in place to mitigate them in accordance with the CIL Regulations. A standard amount of transport funding per dwelling was set out for the viability assessment because it was not possible to differentiate the impacts of development upon the transport network within each housing sub market area. The costs do include an allowance of £10m for passenger transport (Para 6.36 of EXAM76). The funding gap over the entire duration of the local plan is acknowledged. Additional public sector funding will need to be secured to fill the funding gaps. The Borough Council is working closely with Leicestershire County Council to address these funding issues.		

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	Avison Young for Jelson Homes	EXAM75	<p>The Draft Transport Strategies are not subject to public consultation and independent examination. INF2 is intended to provide the policy framework for a roof tax in the absence of appropriate legal basis. The Draft Transport Strategies appear to retrofit a solution rather than tackle the root cause of the problem (the development strategy). The methodology used in the transport assessments is based upon a predict and provide basis rather than a vision and validate approach, and stepped process only considered sustainable transport modes at a later stage rather than from the outset. It is not considered lawful or appropriate that developers should contribute equally to proposed works in a particular strategy area.</p>	<p>The Transport Strategies document (EXAM 75) has been produced by LCC as the Local Highway Authority, supported by CBC, in response to the Inspectors request that '<i>the broad contents of, and the framework for, the Transport Strategies for Loughborough Urban Centre, Shepshed Urban Area, North of Leicester and Soar Valley should be identified and submitted to the Examination.</i>' The three draft strategies are at various stages of preparation. They will not form part of the development plan. The full mitigation package (as currently identified in conjunction with the transport strategies) is needed to mitigate the impacts of growth in the Borough; however, this will also have wider/ancillary benefits and it is not possible just to subdivide the scheme packages into elements that will 'only' address the impacts of development. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. The development strategy has been informed throughout the Plan's preparation by substantial transport evidence which began in 2018. This has prioritised sustainable transport measures as the first approach to mitigating any transport impacts of development growth in the Plan.</p>		
	Avison Young for Jelson Homes	EXAM 57	<ul style="list-style-type: none"> •Reiterated previously made points: (1) Cotes wrongly categorised as new settlement (2) Cotes discounted as site prematurely (3) the SA has not compared sites across different levels on the hierarchy (4) the site selection process has resulted in the 54 sites scenario C or x sites which are less suitable than Cotes (5) Cotes has been wrongly assessed through the SA. •EXAM57 does not state the total number of homes that each option must be able to accommodate. For option 1 intensification of development and Option 2 New sites there the Council needs to provide evidence that the capacities of new sites •Deliver start time and delivery rates for Cotes have not been informed by input from site promoter and are incorrect •It is not clear how the assessment of Cotes has been carried out and whether it has regard to detailed submissions from site promoter at Regulation 19 stage. 	<p>With regard to comments made about sustainability appraisal which is not covered by EXAM 57, then these points were considered as part of Matter 2 and the Council has no further comment at this stage. All SA reports have taken a consistent approach to assessing the impact of development and its mitigation which is set out on pp75-76 of EXAM 7. The particular consideration of Cotes is described on p75. The total number of homes that each option must be able to accommodate are set out in para 4.6 and table 4.2.</p>		

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	Avison Young for Jelson Homes	EXAM 57 continued	<ul style="list-style-type: none"> •Promoters disagree with SA conclusion in relation to Cotes and landscape that: “the potential for significant negative effects exists”. Promoters LVA demonstrates that there is no risk of significant negative effects. •With regard to landscape assessment, Cotes should be ranked alongside Option 1 and certainly above Option 2 because one single incursion into the countryside as per Cotes will have less cumulative impacts than incursions across multiple sites as is the case in other options. •With regard to biodiversity, EXAM57 does not provide any analysis of option 1 ability to deliver biodiversity net gains. Accordingly, option 1 should not be ranked alongside Cotes for biodiversity •With regard to flood risk, the promoters of Cotes have carried out detailed Flood Risk and Drainage Assessment and the promoters of the Cotes consider that the SA finding that there would be increased uncertainty over the development strategy as a result of Cotes is incorrect. 	With regard to comments made about sustainability appraisal which is not covered by EXAM 57, then these points were considered as part of Matter 2 and the Council has no further comment at this stage. All SA reports have taken a consistent approach to assessing the impact of development and its mitigation which is set out on pp75-76 of EXAM 7. The particular consideration of Cotes is described on p75. Cumulative effects are not necessarily more significant if the locations are less sensitive and scale of growth is manageable. All development has the potential to deliver net gain, whether this be on or off site.		
	Avison Young for Jelson Homes	EXAM 57 continued	<ul style="list-style-type: none"> •With regard to soils EXAM57 is inaccurate as it regards. EXAM57 describes Cotes as predominantly grade II land whereas consultant’s Delivery Statement indicates that the site is a combination of best and most versatile land (Grade 2 and subgrade 3a). •With regard to air quality EXAM57 massively overstates likely traffic effects and understating the vehicle movements other options would generate. •With regard to climate change, the assessment of Cotes in EXAM57 is flawed and not based upon evidence. •With regard to historic environment, the assessment of Cotes in EXAM57 is flawed as it has not had regard the promoters evidence. •With regard to poverty and deprivation and promoting healthy lifestyles, promoters of the Cotes site agree with the assessment in EXAM57. •With regard to the affordable housing the assessment of Cotes in EXAM57 is flawed because it incorrectly assumes build out rate and uses assumptions which are not set out in assessment criteria •EXAM57 has not had regard to the Delivery Strategy provided by the promoter of Cotes in its assessment of effects on local economy, material assets •With regard to mineral resources, in the absence of an assessment against the Minerals Local Plan, it is not clear how EXAM57 can conclude one option is materially better than another. 	With regard to comments made about sustainability appraisal which is not covered by EXAM 57, then these points were considered as part of Matter 2 and the Council has no further comment at this stage. All SA reports have taken a consistent approach to assessing the impact of development and its mitigation which is set out on pp75-76 of EXAM 7. The particular consideration of Cotes is described on p75. Detailed surveys have not been undertaken for the SA. Irrespective of this, the site would still be ranked third as it involves the most best and most versatile agricultural land of any option. Only minor negative effects are identified for air quality. The assessment takes account of overlap with mineral safeguarded areas whilst also noting that this does not necessarily mean significant effects would arise.		
	BABTAG	N/A	Reiterate concerns over coalescence and loss of Green Wedge and Areas of Separation. Council's policy is against coalescence but proposals make it inevitable on the ground. HA1 & HA7 are allocated in Green Wedge and Areas of Separation; HA2 & HA3 are in countryside; HA8 should preserve settlement identity and the identity of Barkby and Barkby Thorpe is threatened by Thorpebury and now HA1.	The development strategy was considered under Matter 2 and Areas of Green Wedge and Areas of Local Separation were considered under Matter 3. The Council has no further comments.		HA1, HA2, HA3, HA7, HA8
	Barrow upon Soar Parish Council	N/A	The plan does not address road and transport concerns that will arise from the proposed housing developments in Barrow, particularly the general increase in traffic, the need for pedestrian footways all along Cotes Road, and a cycle route that joins these developments to the A6 cycle route.	The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. The substantial transport evidence supporting the Plan however does not provide a detailed consideration of local road networks or develop detailed specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan.		

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	Boyer Planning for Knightwood Developments	EXAM56/ EXAM58	Comments are made on 56A and 58B-E in relation to promotion of Knightwood Developments site at Six Hills. Questions site selection method in relation to using worst performing criterion to provide overall assessment of site. Further consideration of the supply of the additional proposed housing is required in relation to site intensification and justification for windfall allowance. Further sites should come forward to support development and to avoid an early review of the plan.	The site selection method was considered as part of Matter 6 and was based on identifying those sites that avoided significant harmful impacts before turning to those where those impacts could be mitigated. Information regarding the past number of homes delivered on small windfall sites is provided in the Council's original matter statement (Q7.4). The reasons for choosing the intensification option are that the existing allocations have been identified through a systematic site selection process as the most suitable sites for sustainable development, securing higher densities in appropriate locations can help to ensure the efficient use of land, and that by focussing on proposals being made by promoters providing a level of confidence that the increased capacities could be achieved. The approach is supported in the sustainability appraisal of this option compared against others.		
Carol Warner	N/A	N/A	Inappropriate location for housing. It is a historic environment on the edge of the Outwoods which is designated as an SSSI. It is a valuable landscape and development would involve the loss of agricultural land and biodiversity. The sites are remote from existing facilities, services and bus stops. The cumulative impact of the three sites would be considerable, particularly upon the highway network.	Sites HA15, HA16 and HA17 were allocated following a robust site selection process and have been subject to sustainability appraisal. The importance of landscape and environmental considerations are recognised and these would need to be taken into account in the preparation of development proposals including substantial planting to enhance the relationship between the development and its wooded setting and a Green Infrastructure Strategy that that sets out how planting and other measures will minimise the impact of the development on the landscape and how the development will provide and maintain a functional ecological network. The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. A transport assessment would be undertaken as part of the planning application and a master plan prepared and agreed which will ensure a comprehensive approach to development. .		HA15, HA16,HA17
Carolyn Dadswell	N/A	N/A	HA16 and HA17 are inappropriate allocations largely for parking and transport reasons	The Borough-wide, plan-making evidence commissioned to support the Local Plan does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan.		

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	Carter Jonas for Mr C Green	N/A	<u>Plan Period</u> - Para 22 of the NPPF requires strategic policies to look forward over a period of 15 years adjustments to the Plan period (2021-37) are required to achieve this. The earliest the Plan could be adopted is 2024 so the Plan period should be extended to at least 2039. This means further sites should be allocated to meet an additional two year's housing supply.	The plan period was the subject of discussion as part of Matter 1. The Council's written statements can be found in response to Q1.21 of the original statement and Q1.3 of the supplementary statement.		
	Carter Jonas for Mr C Green	EXAM 57	The SA appraises 3 reasonable alternatives (site intensification; additional sites; Cotes standalone settlement) against 14 objectives and ranks each option. <u>Option 1</u> has been assessed incorrectly for landscape, intensification will lead to loss of greenspace and denser developments in close proximity to Charnwood Forest (eg. at Anstey & Shepshed). Intensifying would have significant negative effects due to loss of green infrastructure available to mitigate visual and physical impact. <u>Option 2</u> Acknowledge that Land East of Thurcaston has the potential to change the landscape character of the settlement but consider that potential negative impacts can be significantly minimised by mitigation. Green buffers at gateways to Thurcaston could avoid new development dominating the settlement. Note that the 2021 SA appraises Land East of Thurcaston as having potential for minor negative effects on landscape sensitivity. Unjustified to discount the site based on Option 2 performing poorer than the other 2 options as mitigation measures are achievable. Option 2 has been appraised unjustly for biodiversity based on an additional site being adjacent to a SSSI. Other sites, eg. Land East of Thurcaston, have minor positive effects. Both Option 1 & 3 include sites close to SSSIs yet are appraised as having minor positive effects, it is unjustified to appraise Option 2 as having minor negative effects based on one site.	The options are appraised on the basis of the packages of sites involved. Therefore, it is appropriate for Option 2 to take account of the negative effects at PSH467. The SA does not determine what the strategy should be and it would be possible to take a hybrid approach that draws upon different elements of the options. The SA concludes that Option 1 performs favourably in terms of achieving a balance between positive and negative effects. The SA explains why negative effects are considered more likely for option 2 for the biodiversity topic. All SA reports have taken a consistent approach to assessing the impact of development and its mitigation which is set out on pp75-76 of EXAM 7.		CC4
	Carter Jonas for Mr C Green	EXAM 57 continued	From 2024 new sites will be required to achieve 10% BNG, Option 2 would deliver the greatest net gain as more sites are allocated. The SA fails to sufficiently explore these implications. Regarding flood risk, a masterplan could be created taking account of Flood Zones 2 & 3 supported by a drainage strategy. In terms of land, agree Land East of Thurcaston will result in the loss of Grade 2 agricultural land noting abundance of Grade 2 in the area, thus the loss does not outweigh the benefits of residential development. For air quality the SA notes Land East of Thurcaston is not adjacent to an AQMA. It will increase trips to Leicester but has strong sustainable transport links, thus reducing reliance on the private car and minimising air quality impacts. Agree with the assessment in relation to climate change but disagree low carbon measures will be required to comply with Policy CC4. In terms of historic environment agree with the SA that Option 3 would have a significant negative effect due to substantial harm to a Scheduled Monument. For Option 2, Land East of Thurcaston could adversely affect a Grade 2 listed farmhouse but adverse effects could be addressed through the planning application process.	See above		
	Carter Jonas for Mr C Green	EXAM 57 continued	The SA concludes Option 1 is the best strategy without justification provided for this conclusion. Option 2 is the most favourable option, allocating additional sites will broaden choice and allocating the greatest amount of housing boosts the supply of homes. There is less reliance on windfall giving greater certainty of delivery. It directs development to the Leicester area contributing to sustainability. In conclusion the SA lacks detail and justification; therefore is not robust. It needs to be updated to meet the test of soundness.	See above		

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	Carter Jonas for Mr C Green	EXAM 56A	A 10% buffer is not sufficient to allow for non-delivery, choice and flexibility and fails to meet the soundness test of being positively prepared, effective and consistent with national policy. The Council has focused on existing sources of supply rather than new allocations as they have been identified through a systematic site selection process as the most suitable sites for sustainable development; best related to infrastructure; and higher densities secures the efficient use of land. This justification is not robust as a number of suitable sites were not put forward as draft allocations, such as Land East of Thurcaston, which is highly sustainable and well related to Leicester. Whilst agreeing that higher densities help ensure the efficient use of land some proposed densities are too high. To be considered sound, Exam 56A needs to thoroughly assess the impacts of capacity revisions.	The plan has had a buffer of approximately 10% from submission onwards. This issue has been examined in relation to Matters 4 and 7. The land east of Thurcaston was assessed as part of the site selection process under reference PSH120. As such it appears in SD/5, SD/6 and EXAM7. While the comments regarding the SA methodology are noted, EXAM56A should be read alongside the sustainability appraisal addendum (EXAM57).		
Clive and Jane Tranter	N/A	EXAM 75	Concerns Transport Strategies do not deal with local impacts and that developers will be required to assess the transport needs and impacts of their own development. Also each developer will consider their impact in isolation without considering other developments. A joined up approach is needed to ensure the best solutions are implemented. An example is HA16 with access through small residential roads not designed as feeder roads for a housing estate. The Council should consider transport impacts of new development and existing infrastructure to dictate required solutions.	The transport strategies provide the delivery tool for mitigation of the cumulative and cross-boundary impacts of Local Plan growth. EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, including cumulative and cross-boundary impacts and undertaken in the context of the policies in the Plan as modified by EXAM 19. These assessments will be evaluated by LCC as the local highway authority and contributions towards mitigation will be sought by CBC through the development management process.		HA16
Clive and Jane Tranter	N/A	N/A	A similar application as HA16 was refused in 2014 due to remoteness from services; lack of public transport; landscape impact; and significant cumulative impacts. These reasons have not changed. Existing roads cannot absorb additional traffic, with additional pressure on local roads from HA15 and HA17. A cohesive transport strategy is needed not a piecemeal, developer led approach.	The comments relate to the suitability of site allocation HA16. The overall development strategy and suitability of sites within it, as set out in the submitted Local Plan, have been considered as part of Matter 2 and Matter 6. The Council has no further comments		HA15, HA16, HA17
Clr Anne Gray	N/A	N/A	Access to open space is becoming more and more difficult for many residents, including those in the most deprived areas of Shelthorpe, as Loughborough spreads towards Quorn and the Outwoods. Wildlife will be disturbed and driven out. Homes built include too many executive-type dwellings, more social housing including low-rise development of 3 storeys with ground floor elderly or disabled facilities with sound-proofing would make more sense. Grange Park development has been allowed without facilities or public transport, we should ensure facilities are provided before houses, at the very least the proposed school at HA15, a health centre and a shop. CBC has declared a climate emergency, how can more houses be built without public transport and reduce carbon emissions. Local roads will not cope with traffic travelling to school, work, shops and places of entertainment. Development should include on-site compensation including trees and butterflies; modern, eco-designed houses not copy and paste estates; wildlife friendly construction; solar panels; heat source pumps; EV charging points; cycle routes and paths; Arc Community Hub funding; access designed to stop cars speeding; driveways to encourage off-street parking; parking spots for deliveries and visitors; enhanced bus service; extra social housing including wheelchair friendly accommodation; designs to stop ASB; housing with all rooms used, low-rise blocks, well-designed buildings and good open spaces.	The comments relate to the development strategy including the suitability of site allocation HA15, together with policies supporting sustainability. The overall development strategy and suitability of sites within it, as set out in the submitted Local Plan, have been considered as part of Matter 2 and Matter 6. The Council has no further comments		HA15

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Cllr Beverley Gray	N/A	EXAM 76	<p>The Report states that the S106 contributions are at the margins of viability which is deeply concerning given HA15, HA16 & HA17 make up 1,350 houses. How will the shortfall be met to meet the needs of these developments? The viability assessment does not pay sufficient regard to flooding measures that are needed to mitigate the exacerbation of flooding for residents on Beck Crescent (edge of HA16), Moat Rd and Bramcote Rd (adj. HA16, part of HA17). Adequate flooding mitigation necessitate re-examination of the viability document.</p>	<p>The viability assessment took into account the latest costed schemes for transport mitigation as evidenced in Leicestershire County Council's Transport Strategies as well as updated costs for education based on advice from the Education Authority. The latest assessment has also been used to examine what might be a 'maximum' level of S106 contributions which could be provided by developers for the typologies and the plan as a whole. Policies DS3(HA15), DS3(HA16) and DS3(HA17) set out the measures, including those relating to flood risk, that developers will need to have regard to in bringing forward sites for development. The Strategic Flood Risk Assessment assessed the flooding and flood risk issues in the area and concluded that the sites were developable. Local Plan Policy CC1, Flood Risk Management was assessed as part of the viability assessment (See the Typologies Matrix on Page 76 of EB/I&DR/1) with costs assumed to be part of the development costs but the typology based approach precluded specific allocations being viability tested.</p>		HA15, HA16, HA17
Cllr Beverley Gray	N/A	EXAM 57	<p>Assessment of the environmental impacts of HA16 & HA17 on an area of Loughborough referred to in the pre-submission Plan as of 'particular sensitivities' in terms of biodiversity and as a buffer to a SSSI have been significantly underplayed by the SA. This must be reviewed and the suitability of the site for such density of development be reassessed or rejected.</p>	<p>The overall development strategy and suitability of sites within it, as set out in the submitted Local Plan, have been examined as part of Matter 2 and Matter 6. EXAM 57 sets out the impacts of different options to meet Charnwood's apportionment of Leicester's unmet need for housing. There are no proposals to increase the capacity of sites HA16 and HA17 in those options. The Council has no further comments.</p>		HA15, HA16, HA17

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Cllr Beverley Gray	N/A	EXAM 75	Reference is made to an increase in sustainable modes of travel as a form of mitigation, the infrastructure in the South of Loughborough does not support this. There is a lack of bus service with more than 1,000 houses beyond walking distance of a bus stop. There are no plans to provide a bus service alongside development in the Plan. 1,350 new homes at HA15, HA16 & HA17 will lead to an increase of 3,000 cars on already congested roads with no plans to improve. There are no plans to improve pedestrian & cyclist safety using Ling Road despite the increase in traffic from new development and changes to traffic flow and speed. There are no coherent plans to develop a joined up cycling/walking network to increase active travel. The A6/A6004 corridor will become increasingly congested with the lack of more sustainable and realistic travel options, as will residential access roads never designed to accommodate such an increase. Schools have limited/no capacity to take extra pupils, HA 15 references a new primary school with no timescales for development. Thus in the absence of additional bus services, the traffic problems will only increase further transporting children to school.	The transport strategies provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth; this includes sustainable travel in the form of passenger transport and active travel initiatives. A primary aim of the transport strategy for Loughborough will be to improve access to sustainable travel which cannot be appropriately addressed on a site-specific basis and will benefit new residents, thereby encouraging modal shift. Sustainable transport infrastructure will be provided as part of a mitigation package promoting sustainable development so that the need to create additional highway capacity to provide for travel by car is minimised. For example, by improving an existing 'poor' passenger transport services or upgrading walking and cycling infrastructure to comply with LTN1/20 / Active Travel England 'objectives'.		HA15, HA16, HA17
Cllr Beverley Gray	N/A	EXAM 75 continued	See above	EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified. The Borough Council is working collaboratively with the education authority and developers to secure the delivery of a new 2 form entry primary school linked to the timescales for housing delivery.		
Cllr Birgitta Worrall	N/A	EXAM 76	The Plan is not viable. Report states that S106 contributions are at the margins of viability which is very worrying as there is no buffer. Government bids will be required to meet additional needs which is very concerning for HA15, HA16 & HA17 equating to 1,350 south of Loughborough. There is no certainty Government funding will be available to support the S106 shortfall.	The viability assessment took into account the latest costed schemes for transport mitigation as evidenced in Leicestershire County Council's Transport Strategies as well as updated costs for education based on advice from the Education Authority. The latest assessment has also been used to examine what might be a 'maximum' level of S106 contributions which could be provided by developers for the typologies and the plan as a whole. Policies HA15, HA16 and HA17 set out the measures that developers will need to have regard to in bringing forward sites for development. The funding gap is acknowledged. The Borough Council is working closely with the County Council to pursue funding options to ensure that the gap is filled over the lifetime of the plan.		HA15, HA16 & HA17

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Cllr Birgitta Worrall	N/A	EXAM 75	Suggested an increase in sustainable travel will provide a large part of the mitigation; however, infrastructure in the south of Loughborough does not support this. There is an oversubscription to local schools necessitating car travel through Loughborough as there is no bus service. There are no definitive plans for secondary education. Concerned about the lack of support to sustainable travel in south section of A6/A6004, plans to improve the flow of traffic and speed will negatively impact on pedestrian & cyclists safety. No new public transport service is planned with new development. Currently 1 bus an hour serves the northern section of the estate, more than 1,000 homes are beyond walking distance. Travel vouchers and bus shelter improvements proposed do not constitute ongoing sustainable travel. No clarity how an increase in passenger services will be achieved if they continue to rely on the commercial sector and subsidies. Another 1,350 homes will cause major transport issues along already congested estate roads and the A6/A6004 corridor.	The transport strategies provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth; this includes sustainable travel in the form of passenger transport and active travel initiatives. A primary aim of the transport strategy for Loughborough will be to improve access to sustainable travel for residents which cannot be appropriately addressed on a site-specific basis, thereby encouraging modal shift. EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified.		
Cllr Deborah Taylor	N/A	EXAM 57	The SA explores 3 options to meet Charnwood's share of unmet need (site intensification; additional sites; Cotes standalone settlement) <u>Landscape</u> for Option 1 the SA states to ensure intensification at Anstey & Shepshed does not have significant negative effects on the landscape given their close proximity to the Charnwood Forest. Sir David Attenborough has recognised the ancient heritage of Charnwood Forest and the National Forest webpage highlights the pressures of development growth on the Charnwood Forest area, including Anstey. Anstey should be protected from over-development and any growth earmarked in the Local Plan should be removed to protect the Charnwood Forest. Charnwood Forest Geopark is becoming an aspiring UNESCO Global Geopark and we cannot allow anything to get in the way of preserving internationally important geology. <u>Landscape Effects of the Submitted Plan</u> Site allocations within Anstey will lead to a substantial loss of green space and field fringes. In some locations such as urban areas the sensitivity is low; therefore impacts on landscape/townscape are neutral or positive. In others, such as Anstey, sensitivity is classed as moderate/moderate-high, an unacceptable risk.	The concerns around option 1 in EXAM57 are noted. The approach to intensification of this site recognises the need to address landscape impacts and the provision of sufficient green infrastructure. This can be achieved through the requirements set out in Policy DS3(HA43).		HA43
Cllr Deborah Taylor	N/A	EXAM 57 continued	Option 1 site intensification involves relatively small amounts of growth for most sites and are unlikely to have a major landscape effect. However, in several locations where intensification is greater (Shepshed/Anstey) it could make it more difficult to avoid negative landscape effects where intensification leads to decreased greenspace or denser development close to the Charnwood Forest. Biodiversity There is a need for a landscape strategy for Anstey sites but no mention of the need to enhance ecological connectivity, as such positive effects are less certain. HA43 at Anstey is identified for more substantial intensification close to a SSSI and adjacent to woodland. It is important to ensure a buffer with the development and the effects of intensification are likely to have potential for greater negative effects. Several allocations are identified where negative effects could occur, in Anstey several allocations are within Conservation Areas with potential for their character to be negatively affected. Negative effects ought to be avoided but there is an element of uncertainty with current Anstey allocations. Effects at HA43 would depend upon how this is achieved, if growth maintains areas of separation and greenspace negative effects are likely avoidable. Overall, there is an uncertain negative effect for this option.	The concerns around option 1 in EXAM57 are noted. The approach to intensification of this site recognises the need to address landscape impacts and the provision of sufficient green infrastructure. This can be achieved through the requirements set out in Policy DS3(HA43).		

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Cllr Deborah Taylor	N/A	EXAM 56A	The increase in the capacity of HA43 reinforces the need for a masterplan led approach, and a draft masterplan is yet to be seen despite assurances at the February 2023 hearings that a draft version had been drawn up. There are planning applications for 1,483 homes in Anstey parish with no masterplan to support decision making.	The policy for the site (DS3(HA43)) requires a masterplan to be agreed before outline permission is granted for the site, or any part of the site.		HA43
Cllr Deborah Taylor	N/A	EXAM 75	<u>Costs, Funding and Delivery</u> Cost estimate work has been proportionate for a Local Plan but it should be noted costs have gone up since production. Complete mitigation package costs are £180m and given current market conditions could rise over the Plan's life. A substantial proportion of the cost relates to delivering walking, cycling and wheeling networks. The SRN A46/A50 area will be impacted by huge growth in Anstey, May 22 estimates cost this as £6.4m with no inflation allowance. This will now be much higher and without increasing housing will be unaffordable for developers. LCC have stated due to their own financial constraints they will be unable to forward fund any infrastructure costs and the situation will only get worse unless developers can fund infrastructure. Villages like Anstey cannot be left in chaos by over-allocations of housing numbers affecting roads, doctors and health due to pollution. <u>Private Funding</u> CBC will secure delivery by developers and/or financial contributions and LCC propose to pool contributions for priority projects when the funding is received. LCC officers have worked on the understanding that CBC support the Main Modifications to the Plan to provide the policy framework to secure developer contributions. Pending the Plan's adoption LCC has sought to secure an interim approach through an Interim Contributions Strategy. CBC has not adopted the Strategy risking communities taking housing without the infrastructure to mitigate development.	The cost estimates represent the best information available at the time, but it is recognised that costs will have increased since this date. Exam 75 shows the transport strategies which provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth. It also includes additional measures which will improve transport in Charnwood for residents, notably in relation to sustainable transport which cannot be appropriately addressed on a site-specific basis, so encouraging modal shift.		
Cllr Deborah Taylor	N/A	EXAM 75 continued	See above	The improvements to the A46/A50 would be funded by developments whose impacts have been assessed in the context of the policies in the Plan, as modified by EXAM 19, including any cumulative or cross-boundary impacts identified. This can be accommodated and is shown through the various viability appraisals. Increases to infrastructure costs have been matched by a similar increase in house prices thus ensuring the funding available to provide infrastructure remains proportionate. CBC are extremely supportive of securing the necessary developer contributions to deliver infrastructure and are working collaboratively with LCC to ensure that the approach taken will comply with the relevant legislation, including CIL Reg 122. The mechanism to undertake this will be applied in the context of the policies in the Plan, as modified, and including any cumulative or cross-boundary impacts identified.		

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Cllr Deborah Taylor	N/A	EXAM 76	Anstey has been included within Wider Charnwood. There is no indication what funding will be provided for Anstey to improve the over-capacity doctor's surgery, library or any other essential service. The Viability Report barely mentions Anstey and appears constantly added to the Wider Charnwood section. This offers little information to the local elected representative as to the support Anstey will benefit from with this huge housing allocation. Increasing Anstey by a third with the viability not closely investigated leaves little hope of any improvements for Anstey which will be overdeveloped and left with the legacy for generations to come.	The Viability Assessment considered that the village of Anstey shares common characteristics with other settlements in the Wider Charnwood Area for housing market purposes. The typology based approach of the viability assessment does not enable a full consideration of the infrastructure needs of every settlement. This is beyond the scope of the assessment. Nevertheless planning applications would be expected to have regard to the impacts of development upon the local area, and the local planning authority would expect developers to negotiate funding contributions to address these issues in accordance with the Community Infrastructure Levy Regulations.		HA12
Cllr Max Hunt		EXAM76	Viability report concludes that even the maximum S106 contributions are right at the margins of viability. LCC supplementary paper states that it is not recommended to set contributions right up to the margins of viability. It would be too high risk to rely on Government bids.	The viability work has been based on typologies rather than actual sites and the assessment margins are different for each typology, for example the margins for brownfield typologies are significantly lower due to the fact that there are greater risks in terms of site assembly, site clearance and remediation costs. The methodology of the Viability Assessment was to ascertain just how high a level of Section 106 contributions that developers could provide while ensuring a viable plan. Other public funding will be required to provide for this gap and ensure that development is delivered over the timescale of the plan.		

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Cllr Max Hunt		EXAM 75	Improvements to traffic flow and speed are at the expense of pedestrians and cyclists. Demand Responsive Transport is ineffective in mitigating the urban peak demand which the transport strategies seek to address. The Passenger Transport Policy and Strategy provides no figures where modal shift can be achieved. There are no demand side measures to encourage sustainable transport. The LCWIP is not yet approved. There is no reference in the transport strategies to housing allocations and no figures to demonstrate the anticipated take up of or modal shift in mitigation of the demand from the housing allocations. The SA notes that Option 3 is the worst performing option as it could generate a large amount of car trips close to Loughborough.	The road schemes should not be considered in isolation as sustainable transport measures also play a vital role in mitigating impacts. A primary aim of the transport strategy for Loughborough will be to improve sustainable travel options. This will take the form of passenger transport and active travel initiatives which will benefit new residents and which cannot be appropriately addressed on a site-specific basis. This will encourage modal shift. CBC and LCC will take all suitable measures to ensure that funding is obtained and the necessary infrastructure is delivered including through developer contributions, bus service improvement plans and funding from Active Travel England. EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified.		
Cllr Ted Parton	N/A	EXAM 75	County Councillor campaigning for the roundabout that links Terry Yardley Way; Ling Road; the Woodthorpe hamlet turn; and Allendale Road to be a more coherent road speed layout. Despite the roads forming the entrance/exit to HA15 & HA16, EXAM 75 does not mention any road improvements to cater for the extra demand from 1,350 homes. LCC Cabinet reports note that even with S106 monies, HA15 & HA16 sufficient transport mitigation cannot be guaranteed. In addition there are no bus routes to HA15. Allendale Rd & Grange Park Drive are not adopted by LCC but are under William Davis ownership.	EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified. The transport strategies provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth; this includes sustainable travel in the form of passenger transport and active travel initiatives. A primary aim of the transport strategy for Loughborough will be to improve access to sustainable travel which will benefit new residents which cannot be appropriately addressed on a site-specific basis, thereby encouraging modal shift.		HA15, HA16

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Cllr Ted Parton	N/A	EXAM 76	<p>Cabinet Report 24.10.23 - Updated Viability Report consolidates previous assessments to provide a robust and sound evidence base. LCC officers have engaged around updated school and transport strategies costs. No single big ticket item but current cost of education and highways alone is £320m. <u>Education</u> £140m with updated school build costs based on most recent experience. <u>Highways</u> £183m based on best estimates available including road schemes, LCWIP estimates and passenger transport estimates. Assessment identifies £200m available for contributions, important to note assessment does not take account of sites which have already secured approval; contributions should not be set at the edge of viability; and is to meet all contributions not just education & highways. Education contributions should take priority over transport. £200m max contributions, if £140m to education, balance of £60m to transport leaving £120m funding gap. Considering growth requirements of Charnwood and wider HMA points to the conclusion, as LCC cannot prevent growth, unless there are significant changes in societal behaviour there are significant limitations to the extent to which the impacts of growth on the transport system can be mitigated in the future. Leicestershire is not unique in the country with congestion more acute in other areas such as the southeast. Significant changes in people's behaviour are required if the impacts of growth on the transport system (and carbon levels) are to be lessened significantly.</p>	<p>It is accepted that the viability assessment has demonstrated a significant funding gap. This was not unexpected. Both the Borough Council and the County Council expected there to be a significant funding gap, but the viability assessment has illustrated how large a gap would need to be filled by other funding sources. The County Council has identified the transport strategies underpinned by developer contributions as being the most effective way of securing other public funding such as redistributed HS2 monies through the Midlands Road Fund and local transport funds for areas outside combined authorities. The Department for Transport has provided more detail on 'Network North' (comprising the redistribution of HS2 monies) including additional funding to support public transport, for which Leicestershire as a whole has received £5.8m and £650m from the Midlands Road Fund. Full details are contained in the report to Leicestershire County Council Cabinet on 19th December 2023. The transport strategies will promote behavioural change through improvements to sustainable transport. Implementation of the plan will take place through to 2037 and the availability of resources will vary over this lengthy timescale.</p>		
	CPRE	EXAM 75	<p>Transport Strategies do not provide necessary assurance in Promoting Sustainable Travel (NPPF para 104 & 105), particular concerns about content, deliverability & funding. <u>Key Issues</u> a) How far will public transport & active travel be promoted and delivered through the Strategies b) How far do road schemes mitigate the impact of traffic growth c) How and with what certainty will there be funding to deliver required measures d) How are developer contributions to be determined or sought. <u>Transport Strategies</u> Para 2.4 recognises significant changes in travel behaviour are required, with para 3.4.2 claiming that enhancement of sustainable travel will not be sufficient to mitigate growth. Limited information provided show this was based on testing very poor suggestions. Mitigation should first reduce car trips by maximising sustainable travel and secondly focus remaining traffic on most appropriate routes. <u>Sustainable Travel</u> Maximising sustainable travel to reduce car trips is a major strand of mitigation but the measures presented are unlikely to have a significant impact. 2021 Census shows over 80% of journeys to work were by car in places where most development is proposed.</p>	<p>The transport strategies provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth; this includes sustainable travel in the form of passenger transport and active travel initiatives. A primary aim of the transport strategies will be to improve access to sustainable travel which will benefit new residents which cannot be appropriately addressed on a site-specific basis, encouraging modal shift. In addressing existing shortfalls in sustainable transport infrastructure as part of a mitigation package promoting sustainable development the need to create additional highway capacity to provide for travel by car is minimised. For example, by improving an existing 'poor' passenger transport services or upgrading walking and cycling infrastructure to comply with LTN1/20 / Active Travel England 'objectives'.</p>		

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	CPRE	EXAM 75 continued	<p>EB/TR4 shows substantial increase in vehicle delay and distance travelled at 2037 due to traffic growth and the scale of the problem. The tinkering proposed at a handful of junctions where potential to increase capacity is highly constrained will not mitigate traffic growth impact and simply move it around. It cannot be assumed the funding will be found. Reducing car use, particularly in Loughborough, would be to transform cycling conditions. LCWIPs are seen as key and are claimed to be driven by public engagement, this is overstated and has been very limited. LCWIP for North of Leicester is at the initial stage and Soar Valley not that far. Figures simply show lines on a map and principles underpinning these are far from clear. The Soar Valley package only shows routes to stations, routes to schools and village centres should be higher priority. Significant number of housing sites are located where there are few facilities and likelihood of a bus service is remote, the need for more sustainable transport was not seriously considered during site selection. Usefulness and viability of demand responsive transport has yet to be proved. Greater uncertainties in funding and long term future of services does not inspire confidence.</p>	<p>The road schemes should not be considered in isolation as sustainable transport measures play a vital role in removing car trips from the highway network. LCC as the local highway authority has confirmed in para 8.6.8 of their Matter 8 written statement that as per the evidence (EXAM31), at an overall Borough/Plan level the combined impact of sustainable transport measures, MRN mitigation, and SRN mitigation) as modelled does not wholly mitigate the impacts at 2036.</p>		
	CPRE	EXAM 75 continued	<p>Given financial pressures and cuts in services there is considerable doubt whether maximising sustainable public transport can be achieved without changes in national and local policies and how much would mitigate the Plan's housing. The Transport Strategies will not increase sustainable travel to any noticeable extent. MRN & Junctions Mitigation proposes targeted MRN improvements but prioritising junction schemes could compromise maximising sustainable transport; increasing MRN traffic and giving funding priority suggests limited commitment to changing travel habits. Designation of section of A6 which carries local traffic as MRN is at odds with other considerations and would be contrary to making other alternative modes more attractive. Key finding in Section 4 shows despite sustainable and MRN interventions there will still be residual network impact. In contrast to reducing car use, time and money has been spent on facilitating increased traffic.</p>	<p>EXAM 75 at section 5.2 details the sources of public and private sector funding. CBC and LCC will take all suitable measures to ensure that funding is obtained and the necessary infrastructure is delivered including through developer contributions, bus service improvement plans and funding from Active Travel England. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved. Policy INF2 will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Work between CBC and LCC is being progressed to ensure this is achieved.</p>		
	CPRE	EXAM 75 continued	<p>Increasing traffic in an urban area (Loughborough) is not consistent with mitigating climate change or reducing car travel. Statement that National Highways is progressing studies is in consistent with their other statements. Significant alterations have been completed at M1 J23 which are now considered inadequate, this is the most expensive scheme proposed. Transport Strategies suggest a total cost of at least £180m with no allowance for inflation. The low proportion for junction schemes give the impression that the capacity of roads is not a priority, it clearly is and seems priority for funding will be these schemes. LCC budget insufficient to fund transport schemes and the intention is to seek Government funding; this is not reliable or satisfactory process. The balance of funding needs to change if there is to be a change to sustainable transport; this will currently facilitate traffic growth. Funding Issues Funding pressures on LCC raises concerns schemes will not be delivered. Public funding from Government will continue to be sought along with developer contributions with projects progressed when funding is received.</p>	<p>See above</p>		

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	CPRE	EXAM 75 continued	LCC has established an Interim Strategy prior to Plan adoption to deal with developer contributions with the delay in adoption making this critical as sites progress. Concern is raised that no suitable methodology exists or is proposed to seek developer contributions and suggestions to pool funding are unworkable. Specifically a) How contributions to bus services are secured from small, dispersed sites outside urban areas b) How pooling from different sites could come forward at different stages and what can be secured from approved sites prior to Plan adoption c) Approvals on unallocated sites lack clarity on required developer contributions. Fundamental problems need to be resolved before the Plan delivers sustainable travel and climate change commitments. Conclusions 1) Transport Strategies do little to increase sustainable travel 2) Proposals to increase traffic on MRN and prioritise funding have minimal impact on traffic and leave residual adverse effects 3) No certainty of public or private funding raising deliverability doubts 4) Basis for seeking developer contributions is not clear	See above		
David Buckeridge	N/A	EXAM75	Concerned about the cumulative impact of HA15, HA16 and HA17 due to the inadequacy of the surrounding road network and poor public transport. Consideration for a link road directly to either of these locations should be considered to minimise the impact on existing roads and the Grange Park estate including turning restrictions. These considerations should be considered as part of the County Council's Transport Strategy	The Borough-wide, transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified. A primary aim of the transport strategies will be to improve access to sustainable travel which will benefit new residents which cannot be appropriately addressed on a site-specific basis, encouraging modal shift.		HA15, HA16, HA17
	Define for Bloor Homes	EXAM 57	Support the approach.	The support is noted.		
	Define for Bloor Homes	EXAM 58	Support the approach.	The support is noted.		
	Define for Bloor Homes	EXAM 75	Pragmatic approach required to ensure timely delivery of homes. Costs must be evidenced. Mechanism for developer contributions is not clear and local plan should therefore be amended. CIL tests must be adhered to.	The Local Plan policies, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved.		
	Define for Bloor Homes	EXAM 76	Publication welcomed	Noted		
	DLP for Lagan Homes	N/A	Comments regarding the consultation process.	Noted		

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	DLP for Lagan Homes	EXAM57	<p>Discuss Lagan's site at Gorse Hill as a reasonable alternative to help meet Leicester's unmet need. SA doesn't take account of the Transport Strategies. SA doesn't assess a full range of reasonable alternatives, SA should have undertaken a comprehensive assessment of all reasonable alternatives. Relying on intensification of sites is unjustified and insufficient.</p>	<p>SA is an appraisal at a point in time there is opportunity to update the SA as part of further appraisal work alongside Modifications. The key legal requirement with regards to SA is that an appraisal of the Plan and reasonable alternatives are undertaken prior to the Plan being finalised. Given that the examination process is still open, and modifications are yet to be decided, the Plan has not been finalised, and therefore, the process is sound. The appraisal of strategic alternatives prior to modifications is a proactive approach to help inform continued discussion before the Plan is finalised.</p>		
	DLP for Lagan Homes	EXAM57 continued	<p>See above</p>	<p>The SA appraisal framework remains valid and appropriate for assessment irrespective of whether the Plan is meeting needs from Leicester or within Charnwood. In this regard it is considered unnecessary and inappropriate for the SA to provide greater weight to positive effects identified for sites in the LUA. There are sites outside the LUA that have good connections to Leicester and it would be misleading to make assumptions that unmet needs would have enhanced positive effects if met in the LUA (compared to other locations that have a functional relationship and are accessible to Leicester). With regards to reasonable alternatives at this stage, these have been identified by the Council in the context of the proposed development strategy and existing SA work and other evidence. The Council has already tested the implications of higher levels of growth and higher proportions of new homes being directed to the LUA (through various iterations of the SA options appraisals prior to submission). It is also important to acknowledge that the proposed Charnwood Spatial Strategy already provides a significant proportion of new homes within the LUA.</p>		

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Duncan Ross	N/A	EXAM 75	Limited assessment of the overall impact of developments (HA15,HA16 and HA17). A much more holistic examination of the effects is required, particularly the impacts on existing infrastructure. Public transport provision in the local area is poor and the local school is at capacity. Strong concern about the impact on local amenities and especially the transport impacts upon the local area.	The Borough-wide transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified. A primary aim of the transport strategies will be to improve access to sustainable travel which will benefit new residents which cannot be appropriately addressed on a site-specific basis, encouraging modal shift.		
	East Leake Parish Council	N/A	Site near Cotes may impact on schools and health facilities. New settlement should be carefully considered and requires traffic assessment. Ensure open spaces between villages. Welcome health care provision in Loughborough town centre.	The comments about Cotes are noted.		
	Environment Agency	N/A	No comments	Noted		
	Fibrewave Limited	N/A	No comments.	Noted		
	Fisher German for Clarendon Land	EXAM58	Comments made in relation to land interests at Gaddesby Lane, Rearsby. Site boundary could be extended to deliver additional 35 homes or even further to deliver 147 homes in total. Plan period should be extended to 2038/39. No allowance in national policy for a LA to advance a plan which cannot demonstrate a minimum 5 year supply. PPG is clear that a main modification is required to rectify this situation. The Sedgfield method should be used in advancing the plan. Increasing the plan period, applying the Sedgfield method and allowing a 5% buffer gives a five year housing requirement of 7,214. If the plan is adopted 2023/24 supply will be 3.8 or 3.9 if adopted in 2024/25 - additional sites need to be included. Relying on intensification of sites is insufficient. Representation lists a number of sites where there is disagreement over delivery assumptions	Information regarding additional land availability is noted. The plan period was the subject of discussion as part of Matter 1. The Council's written statements can be found in response to Q1.21 of the original statement and Q1.3 of the supplementary statement. EXAM 58B sets out five year housing land supply calculations for adoption in 2023/24 as 5.16 years (Sedgfield method) and 5.89 years (Liverpool method). For adoption in 2024/25 EXAM 58B sets out figures of 5.74 years (Sedgfield) or 6.86 years (Liverpool). The housing land supply position and the evidence supporting it were considered as part of Matter 7.		HA66
	Fisher German for Clarendon Land	EXAM57	Not clear why a hybrid option of Option 1 and Option 2 was not considered through the SA. This would help to address the shortfall in housing land supply in sustainable locations, an example of this is Rearsby. HA66 could be extended to deliver more homes.	There are an infinite number of options that could be tested, but the SA process needs to be proportionate. The Council identified three reasonable strategies for dealing with unmet housing needs that are distinct from one another and allow for an understanding of different approaches to be explored. The findings of the options appraisal (alongside previous appraisal findings and individual site assessments) provide the Council with sufficient information to understand what the implications of a hybrid strategy (mix of option 1 and 2) would be. It is not considered necessary to undertake further appraisal work in this respect.		

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	Fisher German for David Wilson Homes	N/A	Comments made in support of interests in three omission sites.	Noted.		
	Fisher German for David Wilson Homes	N/A	Additional years should be added to the plan period to meet the requirements of the NPPF.	The plan period was the subject of discussion as part of Matter 1. The Council's written statements can be found in response to Q1.21 of the original statement and Q1.3 of the supplementary statement.		
	Fisher German for David Wilson Homes	EXAM 58	There is no allowance in national policy or guidance for an Authority to advance a Local Plan which cannot demonstrate a minimum of 5-years supply on adoption. It is an absolute test of the Local Plan and where this is not the case, the PPG is clear that main modifications are required to be included which rectify this position. Sedgefield method should be used rather than Liverpool method. Detailed analysis of housing trajectory presented and replacement version produced. On that basis the housing land supply on adoption is less than four years.	The housing land supply position and the evidence supporting it were considered as part of Matter 7.		
	Fisher German for David Wilson Homes	EXAM 57	While option 3 (new settlement) performs least well, the other two options are similar. No one option alone would achieve the required five year supply of housing taking into account the points raised elsewhere about supply issues. Site intensification may increase delivery over the Plan period but will likely not expedite, and could delay, individual site delivery. Appropriate new allocations could expedite supply and should be part of the approach. The SA produced was never intended to meet a five-year housing land supply shortfall, instead focussing on Plan period delivery, and clearly its preferred option will not rectify a shortfall of housing land supply, thus further revision is required to ensure a robust housing land supply can be demonstrated on adoption of the Plan in accordance with the PPG (inclusive of associated evidence).	Comments regarding the benefits and disbenefits of different options are noted. The SA has considered these and reached a balanced conclusion.		
	Gladman	N/A	No comments	Noted		
	Groby Parish Council	N/A	Failed to consult neighbouring parishes and local authorities. HBBC taxpayers are funding Markfield for CBCs building quota. Growth of Markfield will affect Field Head residents who reside in HBBC.	The Council's compliance with legal requirements including the Duty to Co-operate was considered under Matter 1. The local plan makes no allocations in the Markfield area.		
	Haddon Way Residents Association	EXAM 75	1. Welcome co-ordinated approach to funding mitigation of cumulative impacts. Proposed allocations of HA15, HA16, HA17 and HA 19 should be considered cumulatively as key clusters to ensure a comprehensively master planned approach to assessing the combined impacts of these allocations. Cumulative impact of these developments on the internal estate roads of Haddon Way and Grange Park cannot be left to be assessed individually. Object to the approach set out in paragraph 3.1.4 of Exam 75 which sets out a site by site approach to site-specific impacts. The four sites should be assessed together. This approach is supported for HA16, HA17 and HA19 in the LCC Cabinet report of 23rd June 2023. 2. in order to make the plan sound it should be amended to require a transport assessment of the cumulative impacts of all four sites so that appropriate mitigation can be identified. 3. Also note that the site promoters suggest that the ultimate capacities of the sites could be greater than those set out in the plan. 4. Public transport infrastructure accompanying the original Grange Park development has not been delivered and the estate also suffers from major on street parking on key routes that are most likely to be impacted by the key cluster of allocations proposed.	The transport strategies provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth. EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified. These assessments will be evaluated by LCC as the local highway authority and contributions towards mitigation will be sought by CBC through the development management process, taking into account all relevant factors including new development and existing infrastructure.		

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	Haddon Way Residents Association	EXAM 75	5. There is a lack of public bus services requirements for the HA15, HA16, HA17 and HA19 sites. The requirement in Policy CC5 for new developments to be no more than 400 m walking distance from an existing bus stop will not be deliverable in the case of the HA16, HA17 and HA15 as there is not an existing bus service to connect into. 6. Plan should be amended to ensure that that some form of bus service solution is provided for the new developments HA15, 16, HA17 and 19 to ensure this essential service is available indefinitely and to improve the necessary sustainability of this area. 7. The document refers to improvements to the One Ash roundabout and other junctions on the A6004 which are welcomed. However, we cannot see any improvement measures for the Woodthorpe roundabout in the Transport Strategies. The Woodthorpe roundabout is highly dangerous for pedestrians and cyclists and Exam 75 should be amended to include an assessment and mitigation measures to improve the safety of the roundabout especially as the majority of the key cluster of developments will directly impact this roundabout.	The transport strategies include sustainable travel in the form of passenger transport and active travel initiatives and a primary aim of the transport strategy for Loughborough will be to improve access to sustainable travel which will benefit new residents which cannot be appropriately addressed on a site-specific basis, encouraging modal shift. In addressing existing shortfalls in sustainable transport infrastructure as part of a mitigation package promoting sustainable development the need to create additional highway capacity to provide for travel by car is minimised. For example, by improving an existing 'poor' passenger transport services or upgrading walking and cycling infrastructure to comply with LTN1/20 / Active Travel England 'objectives'.		
	Haddon Way Residents Association	EXAM 57	The conclusions set out in Table 4.1 which state 'Not cause significant adverse environmental effects' and Page 39 which state 'Minor negative effect' are disputed and contradict the wording in the reasoned justification for Policy DS3(HA16). The Sustainability Appraisal Addendum document should be amended to reflect the sensitivities of this site.	Table 4.1 and page 39 set out the impacts of the options to meet Charnwood's apportionment of Leicester's unmet need for housing. None of these options impact HA16. The overall development strategy and suitability of sites within it, as set out in the submitted Local Plan, have been examined as part of Matter 2 and Matter 6.		
	Haddon Way Residents Association	N/A	Given the sensitivities of their locations, the allocations at HA16 and HA17 should not be considered as being appropriate for development in the emerging Local Plan. A previous application on part of site HA16 was refused. A new application for part of HA16 shows that despite policies seeking mitigations, a wholly inadequate approach is proposed to the landscaping and layout of such a highly sensitive area. This also demonstrates the need for stronger policy wording to reflect what is required. 2. The area has also suffered from flooding as a result of over development and poor flood mitigation measures and maintenance regimes. The Trent Rivers Trust has suggested improvements to blue infrastructure design. 3. The following wording should be added to Policy DS3(HA16): 'at least 40% of this sensitive allocation should be safeguarded and allocated for green and blue linear infrastructure corridors contained within the public spaces'. 4. The policy wording for the HA16 and HA17 allocations should be amended to incorporate the suggestions from the Trent Rivers Trust in relation to good blue infrastructure design.	The suitability of the allocations was considered as part of Matter 6. The site specific policies set out an appropriate set of mitigations to ensure sustainable development.		HA16 HA17
	Haddon Way Residents Association	EXAM 76	The allocations at HA16 and HA17 should be treated as "special cases" to avoid the urbanising effects of the developments impacting on the Charnwood Forest and create strategic wildlife corridors. This should allow for at least 40% of the land to be for green / blue infrastructure. Similarly, we expect there will be a need for considerable additional transport infrastructure to mitigate the impacts that are likely to be required as a result of the cumulative assessment of HA15, HA16, HA17 and HA19. These factors should be taken into account as part of the viability assumptions.	A typology approach has been followed in accordance with national guidance. The typologies reflect the type of sites that are likely to come forward for development over the plan period, but they are not specific sites. Average costs and values can then be used to make assumptions about how the viability of each type of site would be affected by all relevant policies.		

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	Hollins Strategic Land	EXAM 57	Support the proposed intensification of proposed allocations and the overall conclusion of the SA that this is the most sustainable approach.	In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development. The characteristics used to group sites should reflect the nature of typical sites that may be developed within the plan area and the type of development proposed for allocation in the plan.		
	Hollins Strategic Land	EXAM 56	Support the inclusion of at least 85 dwellings on HA65.	Support is noted.		HA65
	Hollins Strategic Land	EXAM 58	Consider the trajectory is appropriate though site could come forward earlier than 2026/27.	Comments are noted.		HA65
	HBF	EXAM 57	1. How have the implications of the Transport Strategies fed into the SA process. The SA should have explicitly considered the implementation of the three Transport Strategies. 2. Justification for the Strategies include a critique of the development strategy chosen and the cumulative impacts of dispersed development. 3. Para 7.4 notes the SA was prepared 'prior to the Council determining which approach is to be followed.' This stage of the SA does not set out which approach the Council has taken and why; the Plan should address the approach to meeting Leicester's unmet need through Main Modifications. Allocation of new sites was discounted, there may be different transport implications for each option which should have been SA'd. All the new evidence needs to fit in a coherent package that explains the approach, including clear justification of the additional request for developer contributions and that deliverability isn't undermined.	SA is an appraisal at a point in time. There is opportunity to update the SA as part of further appraisal work alongside Modifications. The key legal requirement with regards to SA is that an appraisal of the Plan and reasonable alternatives are undertaken prior to the Plan being finalised. Given that the examination process is still open, and modifications are yet to be decided, the Plan has not been finalised, and therefore, the process is sound. The appraisal of strategic alternatives prior to modifications is a proactive approach to help inform continued discussion before the Plan is finalised. The development strategy was examined under Matter 2 including its performance against a wide range of criteria, not just transport. it should be noted that further SA work will be undertaken to support modifications to the Plan. This provides opportunity to address any concerns raised through subsequent examination hearings and in response to consultation responses.		
	HBF	EXAM 56	The update only identifies 5.16 years supply for 2023/24, additional flexibility is needed.	EXAM 58B sets out five year housing land supply calculations for adoption in 2023/24 as 5.16 years (Sedgefield method) and 5.89 years (Liverpool method). For adoption in 2024/25 EXAM 58B sets out figures of 5.74 years (Sedgefield) or 6.86 years (Liverpool). The housing land supply position and the evidence supporting it were considered as part of Matter 7.		
	HBF	EXAM 58	Concerns that Council will be unable to demonstrate a 5 year supply upon adoption of the Plan, further information is needed to provide confidence. This needs to be kept under review should further delays occur in the adoption of the Plan.	EXAM 58B sets out five year housing land supply calculations for adoption in 2023/24 as 5.16 years (Sedgefield method) and 5.89 years (Liverpool method). For adoption in 2024/25 EXAM 58B sets out figures of 5.74 years (Sedgefield) or 6.86 years (Liverpool). The housing land supply position and the evidence supporting it were considered as part of Matter 7.		

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	HBF	EXAM 75	<p>The current status of the Transport Strategies is unclear and they appear to be at different stages. It is also unclear how any suggested changes to these documents will be taken on board, will it be through the EIP process or by changes to the documents themselves. What status will the documents have and how do they relate to the Local Plan adoption. LCC have been seeking to implement these documents prior to adoption of the Local plan or any consultation on the documents themselves. The strategies should be considered in the context of other EIP documents including EXAM 74 which states LCC's intention to implement an interim approach, prior to Local Plan adoption. Transport work has been prepared late and has not informed the development of the Local Plan but is now necessary to address the problems new development will create.</p>	<p>The Transport Strategies document (EXAM 75) has been produced by Leicestershire County Council as the Local Highway Authority, supported by CBC, in response to the Inspectors request that '<i>the broad contents of, and the framework for, the Transport Strategies for Loughborough Urban Centre, Shepshed Urban Area, North of Leicester and Soar Valley should be identified and submitted to the Examination.</i>' The three strategies, which are at various stages of preparation will not form part of the development plan. The full mitigation package (as currently identified in conjunction with the transport strategies) is needed to mitigate the impacts of growth in the Borough; however, this will also have wider/ancillary benefits and it is not possible just to subdivide the scheme packages into elements that will 'only' address the impacts of development. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122, and seek to mitigate the impact of development including cumulative and cross-boundary impacts.</p>		
	HBF	EXAM 75 continued	<p>Overarching Concerns Concerned with the approach, methodology and conclusions of the Strategies. The approach does not meet the CIL tests, development should only mitigate its own impacts not address existing deficiencies; the Strategies need to show existing deficiencies and cumulative effects of development. The Strategies rely on road improvements and do not integrate different elements and encourage modal shift. The Strategies see walking and cycling as entirely separate and do not recognise that improvements in these modes will reduce the need for road improvements. The Strategies recognise the need for changes in peoples behaviour but suggest this is not possible and in the meantime adopt mitigation via a Plan led approach. Chp 4.1 Evidence Unable to find the evidence to support the assertion that enhancement of sustainable transport will be sufficient to mitigate growth. The LCWIPs are not in place. Para 4.4.4 notes the drop in bus usage, an existing problem developers cannot be expected to address, to comply with the CIL tests evidence needs to set out the impact of additional development. Para 4.4.6 looks at delays due to existing road conditions, which development cannot be expected to address. Developer contributions for transport infrastructure must be supported by robust evidence and satisfy the CIL tests.</p>	<p>It is important to recognise that the interim approach mentioned is separate from EXAM 75 and the two should not be confused or conflated. EXAM 75 sets out the Transport Strategies to underpin the delivery of the Local Plan, the interim transport contribution strategy will provide the mechanism to seek developer contributions. The Local Plan has been informed throughout its preparation by substantial transport evidence which began in 2018. The strategies, whilst mitigating Local Plan growth, are a delivery tool to improve the transport network for residents and are not a development plan document. The Local Plan, as modified, provides the policy framework to seek developer contributions to mitigate impacts of development, including cumulative and cross-boundary impacts. The robust evidence base supporting the Local Plan (EB/TR/1 to TR/13 & EXAM 31) identifies the impacts of development.</p>		

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	HBF	EXAM 75 continued	<p>Chp 5.1 Cost estimates The cost estimates are vague and contributions unclear raising concerns over viability and deliverability, further work and discussion is needed. Chp 5.2 Funding Sources Significant concerns over the collection and spending of monies which appear to fail the CIL tests and amount to a roof tax, not directly related in scale and kind to the development. This approach is not appropriate under S106 but should be done through introduction of CIL. S106 should set out what is being contributed to and a timeframe for delivery; it is currently unclear how funding will be spent appropriately. The phasing of transport schemes relative to progress of development needs further thought is pooling is to be justified and deliverable. Reliance on public funding is a further complication and not guaranteed; what would happen to contributions if a scheme was not delivered. Proposed Main Modifications cannot be relied upon to secure developer contributions and deliver the Strategies as they have not been agreed. LCC's approach appears to be meeting existing priorities not the impacts of development. Developer contributions sought must form part of whole plan viability appraisal, not be left for a later date; the Local Plan should clearly set out and justify what contributions are required.</p>	<p>The mitigation package has prioritised sustainable transport measures as the first approach to mitigating any transport impacts of development growth in the Plan and this has reduced the road improvements required. A primary aim of the transport strategies will be to improve access to sustainable travel which will benefit new residents which cannot be appropriately addressed on a site-specific basis, encouraging modal shift. In addressing existing shortfalls in sustainable transport infrastructure as part of a mitigation package promoting sustainable development the need to create additional highway capacity to provide for travel by car is minimised. For example, by improving an existing 'poor' passenger transport services or upgrading walking and cycling infrastructure to comply with LTN1/20 / Active Travel England 'objectives'. The Local Plan evidence base provides the justification for the package of measures to mitigate growth, including cumulative and cross-boundary impacts. Development will not be required to address existing problems. The Strategies provide a holistic approach, addressing the impact of development and improving the transport network for users.</p>		
	HBF	EXAM 75 continued	<p>Chp 5.3 Delivery To allow some development prior to full mitigation measures the Plan should set out phasing in relation to transport scheme delivery. Concerned how design and costs of works to address cumulative impacts will be coordinated between developments occurring across a range of sites at different timescales.</p>	<p>Sustainable transport improvements will encourage modal shift and reduce potential pressure on the road network. Cost Estimates The cost estimates for the highway schemes have been established from the Local Plan evidence base. LCC has determined costs for the sustainable travel elements of the Strategies. It should be noted that development will not be expected to fund the entire costs of the Strategies. The policies in the Plan, as modified, will provide the policy framework to seek developer contributions which comply with legislation. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved.</p>		

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	HBF	EXAM 76	<p>Requires further updates to include updated school build costs. Concerned about infrastructure delivery where public funding has yet to be established. S106 is not a fund to spend on whatever projects desired. <u>Part L & Future Homes</u> not included - additional costs for net carbon ready housing from 2025. <u>Biodiversity Net Gain</u> Data to derive figures is dated. Statutory national credits are unviable for local markets. <u>Affordable Housing Return</u> 6% affordable housing return is no longer appropriate. <u>LCC S106 Requests</u> at its most basic level the S106 ask is unviable. The viability study shows the Plan is undeliverable and policy requirements as a whole should be revisited and revised until an option is found where viability can be achieved. Calculating the maximum level of S106 is not appropriate and does not comply with viability guidance, best practice or meet the CIL tests. Development should only mitigate its own impact, the viability test should be about testing policy not seeking to establish maximum headroom for contributions. The logical conclusion of LCC's S106 requests would be to reduce affordable housing. This appraisal fixes affordable housing contributions and seeks to adjust education and transport contributions.</p>	<p>The Borough Council has worked closely with Leicestershire County Council in calculating the costs of providing for primary, secondary schools and post 16 school places to inform the latest viability assessment. The costs of school construction have increased significantly in recent years and these higher costs have been reflected in viability work. The provision of new primary schools is an important aspect of our approach and we will work with the education authority and private sector developers to ensure that this takes place. An Education Delivery Strategy for Barrow (EXAM70) has been prepared and discussions are taking pace regarding the delivery of schools in South Loughborough and Shepshed. The infrastructure funding gap is acknowledged but this was expected because of the high costs of transport and education that the Borough Council was advised to viability test. Other sources of funding from the public sector will be required to ensure that the plan is delivered. All Section 106 agreements will be negotiated in accordance with the CIL Regulations, but the CIL Regulations do allow for pooling of contributions to fund infrastructure which serves a number of developments. Future costs to provide for carbon reductions are likely but are not yet known.</p>		

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	HBF	EXAM 76 continued	See above	Biodiversity net gain has been an emerging policy area and will be part of individual planning decisions but the local plan policy has been in place throughout the viability assessment and was taken into account as part of the development cost calculations in the initial viability assessment (EB/I&D/1) and in viability assessment thereafter. The delivery of affordable housing is an important aspect of local planning policy as expressed in Policy H4. the policy has been informed by evidence of viability. Section 106 contributions will be negotiated at planning application stage and infrastructure prioritised in accordance with the policies of the Local Plan and the supporting evidence in the Infrastructure Delivery Plan. The affordable housing return comment is noted. The Borough Council is working closely with Leicestershire County Council to ascertain how additional public sector funding can be sourced and to what extent there needs to be some prioritisation of infrastructure, but we do not agree that affordable housing should be reduced. Future implementation work may lead on to further viability testing to ensure deliverability.		
	HBF	N/A	Unclear whether the consultation is limited to active participants in the EIP or a full public consultation; if it is limited a full consultation is needed.	Noted		
Isabel Beetham-Holman	N/A	EXAM 75	Concerned about the impact of development of HA15, HA16 and HA17 upon local residents. Local traffic is already congested and it would be made worse. The cumulative impacts of these developments will be considerable. Concern that settlements will coalesce as a result of excessive development.	The Borough-wide, plan-making evidence commissioned to support the Local Plan does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified.		HA15,HA16, HA17

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Jennifer Thompson	N/A	EXAM 75	Need to consider the cumulative impact of HA15, HA16 and HA17. The local road network was not designed to cater for such a large increase in traffic, and public transport is poor.. The transport impacts have not been satisfactorily assessed and the Council should undertake a full traffic impact study.	The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified. These assessments will be evaluated by LCC as the local highway authority and necessary mitigation considered CBC through the development management process.		HA15, HA16, HA17
Jim A	N/A	EXAM 75	Development of HA15, HA16 and HA17 would have a serious impact on the local road network.	The Borough-wide, plan-making evidence commissioned to support the Local Plan does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified.		HA15, HA16, HA17
John Catt	N/A	EXAM 75	Detailed highway considerations. Concerned about the proposals regarding Beacon Road / Epinal Way Roundabout and One Ash Roundabout.	The Borough-wide, plan-making evidence commissioned to support the Local Plan does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19, and including any cumulative or cross-boundary impacts identified.		
	Leicester City Council	N/A	No observations.	Noted		
	Leicestershire County Council	EXAM 57	Approach to accommodating Leicester City's unmet need is practical and relatively low risk. No further comments.	The County Council's comments that site intensification is practical and relatively low risk, are noted.		
	Leicestershire County Council	EXAM 56	Not necessary to comment.	Noted		
	Leicestershire County Council	EXAM 58	Not necessary to comment.	Noted		
	Leicestershire County Council	EXAM 75	LCC have prepared a response to Inspectors letter (EXAM 71) providing broad content and framework for 3 transport strategies outlining their rationale and context; work to date; ongoing work; latest cost assumptions, funding & delivery; and next steps. No further comments necessary.	Noted		

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	Leicestershire County Council	EXAM 76	Updated report consolidates previous assessments to provide a robust and sound evidence base. LCC officers have engaged around updated school and transport strategies costs. No single big ticket item but current cost of education and highways alone is £320m. <u>Education</u> £140m with updated school build costs based on most recent experience. <u>Highways</u> £183m based on best estimates available including road schemes, LCWIP estimates and passenger transport estimates. Assessment identifies £200m available for contributions, important to note assessment does not take account of sites which have already secured approval; contributions should not be set at the edge of viability; and is to meet all contributions not just education & highways. Education contributions should take priority over transport. £200m max contributions, if £140m to education, balance of £60m to transport leaving £120m funding gap.	The existence of a funding gap is acknowledged. The Borough Council is working closely with the County Council to pursue funding options to ensure that the gap is filled over the lifetime of the plan. The Local Plan's transport and education costs were the result of a process of dialogue with the County Council. and joint working will continue to ensure the plan is implemented effectively.		
	Leicestershire County Council	EXAM 76 continued	Very significant gap but the Plan is supported as demand will occur whether the plan is in place or not; lack of coordination between spatial planning and public investment in infrastructure is a national issue which LCC officers continue to raise with Government; failure to adopt the Plan would worsen the situation with unplanned growth coming forward without a cohesive basis to secure contributions with significant impacts on local communities; the 3 transport strategies underpinned by a contributions mechanism remain the best way to secure transport contributions, and secure any public funding available such as redistributed HS2 monies through Midlands Road Fund and local transport funds for areas outside combines authorities. It is in the best interest of communities to have an up to date Plan in place, working with CBC to overcome challenges.	The existence of a funding gap is acknowledged. The Borough Council is working closely with the County Council to pursue funding options to ensure that the gap is filled over the lifetime of the plan. The Local Plan's transport and education costs were the result of a process of dialogue with the County Council. and joint working will continue to ensure the plan is implemented effectively.		
	Lichfields for CEG	EXAM 56A	Planning applications for HA7 exceed the proposed capacity in the trajectory which reinforces concern that quantum of housing proposed for NEoL SUE cannot be accommodated alongside necessary infrastructure, notably north west link road and outdoor sports provision. No evidence exists to support the higher capacity of HA7, it should be revised down to support SUE infrastructure provision.	The Council considers that the increased capacity of HA7 can be accommodated without impact on the delivery of infrastructure for the Northeast Leicester Sustainable Urban Extension. The issues raised are being dealt with through the development management process.		LUA2, HA7
	Lichfields for CEG	EXAM 75	Concern that latest evidence does not adequately address effects of growth by recognising travel demand already accommodated by strategic sites such as NEoL SUE. Strategy must make provision for additional developments to contribute towards highway works to avoid capacity created by strategic sites being taken up by other development. Greater certainty and justification around costs and funding needed to ensure necessary infrastructure will be funded by viable development and costs appropriately apportioned to different developments. Further comments on significant modifications to transport and infrastructure policies will be made as part of future main modifications consultation.	The planned growth has been taken into account in the modelling baseline and cumulative impacts assessed. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122, and seek to mitigate the impact of development including cumulative and cross-boundary impacts. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved.		LUA2

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	Lichfields for St Philip	EXAM 75	<p>1. Concerned that Transport Strategies could result in planning obligations being sought that do not satisfy the requirements set out in the CIL Regulations and conflict with paragraph 57 of the NPPF. 2. The Council must be certain that the evidence underpinning the Transport Strategies shows that planned development in the Borough would lead to impacts on all of the transport infrastructure identified, such that financial contributions levied on a standardised rate (e.g. calculated on a per dwelling basis) can be sought to mitigate those impacts. Currently, The evidence regarding the extent to which relevant development coming forward on proposed allocation sites would impact on different elements of transport infrastructure for which improvements are identified is not clear. 3. It is important that the County Council does not seek to mitigate existing deficiencies by securing developer contributions from future schemes. Development proposals are only required to mitigate their own impacts. 4. The approach of pooling funding brings into question whether the identified infrastructure would actually mitigate the impact of a development, noting that the potential lengthy timeframe to obtain the required amount from various developments could be several years. 5. The Council has not supported the transport contributions strategy at recent appeals. 6. Impacts should be assessed on an individual application basis and contributions sought accordingly.</p>	<p>Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122, and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved. The full mitigation package (as currently identified in conjunction with the transport strategies) is needed to mitigate the impacts of growth in the Borough; however, this will also have wider/ancillary benefits and it is not possible just to subdivide the scheme packages into elements that will 'only' address the impacts of development. Pooling is required due to the cumulative impact of development on the transport network.</p>		
	Lichfields for St Philip	EXAM 75 continued	See above	<p>A primary aim of the transport strategies will be to improve access to sustainable travel which cannot be appropriately addressed on a site-specific basis and will benefit new residents, encouraging modal shift. In addressing existing shortfalls in sustainable transport infrastructure as part of a mitigation package promoting sustainable development the need to create additional highway capacity to provide for travel by car is minimised. For example, by improving an existing 'poor' passenger transport services or upgrading walking and cycling infrastructure to comply with LTN1/20 / Active Travel England 'objectives'. Specific mitigation measures for each individual site allocation will be identified through site specific transport assessments, undertaken in the context of the policies in the Plan.</p>		
	Lichfields for St Philip	EXAM 76	<p>Results show that external funding will be required as relying solely on S106 contributions will make development unviable. It is unclear how the calculations of the maximum total s106 obligations relate to the costs identified in the report.</p>	<p>The comments on viability are noted. The latest viability assessment (EXAM76) was used to assess how much could be sought from developers to fund infrastructure for each development typology and cumulatively for the plan as a whole. Additional funding from the public sector will be required over the lifetime of the plan.</p>		

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Local resident	N/A	EXAM 75	Objects to housing development in South Loughborough because it would cause heavy traffic. Public transport is poor and unreliable and primary schools in the area are already fully subscribed. Shops and amenities are always lacking as part of the development process.	The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19. The Borough Council has been working closely with the education authority to assess school provision.		
	L'boro and District Cycle Users Campaign	EXAM75	Proposed highway improvements do nothing to encourage active travel. A number of locations are suggested for active travel improvements	More site specific sustainable transport measures will be more properly and appropriately identified through site specific transport assessments. This will be done in the context of the LCWIPs, which are at various stages of preparation. The Loughborough Area LCWIP was adopted in November 2023 by LCC's Cabinet and the North of Leicester Area LCWIP is under development for adoption in Autumn 2024.		
	L'boro FC	N/A	Confirm previous comments.	Noted		
Malcolm Young	N/A	EXAM 75	Concerned about the impact of HA15, HA16 and HA17. Objects to the approach to transport assessment set out in Para 3.1.4 and the lack of detailed consideration to site impacts and mitigation as part of the local plan process. Concerned that the cumulative impacts of these three sites will be considerable, and local roads are not adequate to cope with a large increase in traffic. Need for consideration of cumulative impact.	The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19.		
	Marrons for Bellway Homes	EXAM 57	Support approach to intensification which will enable additional supply to be brought forward quickly in the most sustainable locations. The approach is also consistent with achieving effective use of land.	The support for intensification is noted.		
	Marrons for Bellway Homes	EXAM 56A	Suggest caution in the use of windfalls, particularly at rate of 63 homes per year. The Council has not previously sought to rely on any windfall contribution and it is a curious shift in position brought about to meet an increased housing requirement rather than a shift in the reliability of the source of supply. Note increased capacities at HA7 and HA59 but these could be increased further.	Paragraph 71 of the NPPF supports the principle of including a contribution from windfalls and the evidence provided in response to Q7.4 in the Council's original matter statement demonstrates that this has provided a consistent level of supply. The policies in the plan, as modified by EXAM 19, support sustainable development beyond that set out in the allocations, including within existing settlement limits. Other comments noted.		

FULL NAME	ORG DETAILS	EXAM DOC REF	REPRESENTATION SUMMARY	RESPONSE	LOCAL PLAN MODIFICATION (if required)	OTHER LP REF
	Marrons for Bellway Homes	EXAM 58B	No issues with timeframe or rate of delivery for promoted sites (HA7 and HA59) but note additional capacity could be provided as shown in submitted applications.	Comments are noted.		HA7, HA59
	Marrons for Bellway Homes	EXAM 58D	Note calculations of five year housing land supply using the Sedgefield and Liverpool methods. Any shortfall in delivery should be addressed speedily, ie by using the Sedgefield method.	Comments are noted.		
	Marrons for Bellway Homes	EXAM 75	1. No issue raised with approach set out in strategies but it is critical that delivery of any necessary projects can occur in a timely manner and in relation to any strategic allocations reliant upon them. There is otherwise a risk that approach will delay development. 2. Notes that some costs are provisional at this stage. 3. Approach to sharing of the costs required of developers across development schemes should be proportionate and comply with CIL Regulations. 4. The calculation of highway costs uses a catchment larger than the Borough and seeks to address existing problems.	Delivery of infrastructure is recognised as critical to development. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved. The full mitigation package (as currently identified in conjunction with the transport strategies) is needed to mitigate the impacts of growth in the Borough; however, this will also have wider/ancillary benefits and it is not possible just to subdivide the scheme packages into elements that will 'only' address the impacts of development. Pooling is required due to the cumulative impact of development on the transport network.		
	Marrons for Bellway Homes	EXAM 75 continued	See above	A primary aim of the transport strategies will be to improve access to sustainable travel which cannot be appropriately addressed on a site-specific basis and will benefit new residents, encouraging modal shift. In addressing existing shortfalls in sustainable transport infrastructure as part of a mitigation package promoting sustainable development the need to create additional highway capacity to provide for travel by car is minimised. For example, by improving an existing 'poor' passenger transport services or upgrading walking and cycling infrastructure to comply with LTN1/20 / Active Travel England 'objectives'.		

FULL NAME	ORG DETAILS	EXAM DOC REF	REPRESENTATION SUMMARY	RESPONSE	LOCAL PLAN MODIFICATION (if required)	OTHER LP REF
	Marrons for Bellway Homes	EXAM 76	<p>1. Land values are higher than set out in the report because outliers have been included. The report also confuses gross and net land values and is not consistent in the application of indexing with some costs, for example through reliance on rates from 2021. The identified education costs do not match those identified in the National School Delivery Cost Benchmarking report (2022). 2. The Report recognises that there is a funding gap between the amounts which are required to deliver the plan and the amounts that can reasonably be sought from developers through Section 106 contributions alone with alternative funding required from a range of Government sources. 3. The CIL tests place the burden of evidencing the need for planning obligations onto the requesting authority and need to be supported by clear and robust evidence. The findings of EXAM76 are sufficient to provide a direction of travel for the strategic planning of infrastructure, but cannot form the basis for understanding contributions required from individual developments and it will be necessary for up to date assessments to explore contributions and viability.</p>	<p>We welcome the view that EXAM76 is sufficient to provide "a direction of travel" for the strategic planning of infrastructure and accept that detailed assessment will be required to inform Section 106 negotiations in accordance with the CIL Regulations. The benchmark land value assumptions are set out on Page 41 of the February 2021 Viability Assessment (EB/I&D/ 1). This shows the gross and net assumptions. The methodology and emerging findings were 'sense checked' at a stakeholder workshop of developers at that time. The latest Viability Assessment (EXAM76) includes the latest transport and education costs as well as updated costs and values (see paragraph 1.9 of EXAM76). The education costs were assembled from advice from Leicestershire County Council as the education authority. Leicestershire County Council does not contribute data to inform the National School Delivery Benchmarking Report (NSDBR). The NSDBR shows a wide variation in costs across the country. Although the County Council has regard to the NSDBR data their figures reflect actual cost estimates based on recent experience in Leicestershire. The infrastructure funding gap is acknowledged and additional public sector funding will be required over the lifetime of the plan.</p>		HA59
	Marrons for Bellway Homes	EXAM 76 continued	<p>4. Site HA59 is to be the location for an expansion to the local primary school. S106 contributions have been sought from this application but the remainder of the funding will be obtained from other allocations. There is not currently a delivery strategy in place to achieve this.</p>	<p>CBC is promoting discussions with developers to ensure school delivery where this is identified in local plan policy and this will include Site HA59. EXAM70, the Barrow Education Delivery Strategy illustrates an approach which the Council would hope to replicate elsewhere.</p>		
	Marrons for Hallam Land Management	EXAM 57	<p>Support approach to intensification which will enable additional supply to be brought forward quickly in the most sustainable locations. The approach is also consistent with achieving effective use of land.</p>	<p>The support for intensification is noted.</p>		
	Marrons for Hallam Land Management	EXAM 56A	<p>Suggest caution in the use of windfalls, particularly at rate of 63 homes per year. The Council has not previously sought to rely on any windfall contribution and it is a curious shift in position brought about to meet an increased housing requirement rather than a shift in the reliability of the source of supply. Note increased capacities at HA64.</p>	<p>Paragraph 71 of the NPPF supports the principle of including a contribution from windfalls and the evidence provided in response to Q7.4 in the Council's original matter statement demonstrates that this has provided a consistent level of supply. The policies in the plan, as modified by EXAM 19, support sustainable development beyond that set out in the allocations, including within existing settlement limits. Other comments noted.</p>		
	Marrons for Hallam Land Management	EXAM 58B	<p>No issues with timeframe or rate of delivery for promoted site (HA64).</p>	<p>Comments are noted.</p>		HA64
	Marrons for Hallam Land Management	EXAM 58D	<p>Note calculations of five year housing land supply using the Sedgefield and Liverpool methods. Any shortfall in delivery should be addressed speedily, ie by using the Sedgefield method.</p>	<p>Comments are noted.</p>		

FULL NAME	ORG DETAILS	EXAM DOC REF	REPRESENTATION SUMMARY	RESPONSE	LOCAL PLAN MODIFICATION (if required)	OTHER LP REF
	Marrons for Hallam Land Management	EXAM 75	<p>1. No issue raised with approach set out in strategies but it is critical that delivery of any necessary projects can occur in a timely manner and in relation to any strategic allocations reliant upon them. There is otherwise a risk that approach will delay development. 2. Notes that some costs are provisional at this stage. 3. Approach to sharing of the costs required of developers across development schemes should be proportionate and comply with CIL Regulations. 4. The calculation of highway costs uses a catchment larger than the Borough and seeks to address existing problems.</p>	<p>Delivery of infrastructure is recognised as critical to development. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved. The mitigation package does not seek to address existing problems, the full mitigation package (as currently identified in conjunction with the transport strategies) is needed to mitigate the impacts of growth in the Borough. However, this will also have wider/ancillary benefits and it is not possible just to subdivide the scheme packages into elements that will 'only' address the impacts of development. Pooling is required due to the cumulative impact of development on the transport network. There is no restriction that mitigation can only be sought within a district boundary, impacts of development on the highway network are not constrained by administrative boundaries. This would effectively, at least for the moment under the current system, remain a 'duty to cooperate' matter between the relevant authorities.</p>		

FULL NAME	ORG DETAILS	EXAM DOC REF	REPRESENTATION SUMMARY	RESPONSE	LOCAL PLAN MODIFICATION (if required)	OTHER LP REF
	Marrons for Hallam Land Management	EXAM 76	1. Land values are higher than set out in the report because outliers have been included. The report also confuses gross and net land values and is not consistent in the application of indexing with some costs, for example through reliance on rates from 2021. The identified education costs do not match those identified in the National School Delivery Cost Benchmarking report (2022). 2. The Report recognises that there is a funding gap between the amounts which are required to deliver the plan and the amounts that can reasonably be sought from developers through Section 106 contributions alone with alternative funding required from a range of Government sources. 3. The CIL tests place the burden of evidencing the need for planning obligations onto the requesting authority and need to be supported by clear and robust evidence. The findings of EXAM76 are sufficient to provide a direction of travel for the strategic planning of infrastructure, but cannot form the basis for understanding contributions required from individual developments and it will be necessary for up to date assessments to explore contributions and viability.	We welcome the view that EXAM76 is sufficient to provide "a direction of travel" for the strategic planning of infrastructure and accept that detailed assessment will be required to inform detailed assessment of Section 106 negotiations in accordance with the CIL Regulations. The benchmark land value assumptions are set out on Page 41 of the February 2021 Viability Assessment (EB/I&D/ 1). This shows the gross and net assumptions. The methodology and emerging findings were 'sense checked' at a stakeholder workshop of developers at that time. The latest Viability Assessment (EXAM76) includes the latest transport and education costs as well as updated costs and values (see paragraph 1.9 of EXAM76). The education cost were assembled from advice from Leicestershire County Council as the education authority. They reflect latest cost estimates based on recent experience in Leicestershire. The funding gap is acknowledged and additional public sector funding will be required over the lifetime of the plan.		
	Marrons for Richborough, William Davis and Bowler Family	EXAM 57	Support approach to intensification which will enable additional supply to be brought forward quickly in the most sustainable locations. The approach is also consistent with achieving effective use of land.	The support for intensification is noted.		
	Marrons for Richborough, William Davis and Bowler Family	EXAM 56A	Suggest caution in the use of windfalls, particularly at rate of 63 homes per year. The Council has not previously sought to rely on any windfall contribution and it is a curious shift in position brought about to meet an increased housing requirement rather than a shift in the reliability of the source of supply. Capacity of site HA15 has not been increased despite the Council being made aware of the potential to do so.	Paragraph 71 of the NPPF supports the principle of including a contribution from windfalls and the evidence provided in response to Q7.4 in the Council's original matter statement demonstrates that this has provided a consistent level of supply. The policies in the plan, as modified by EXAM 19, support sustainable development beyond that set out in the allocations, including within existing settlement limits. Other comments noted. The option to increase the capacity of HA15 was considered in EXAM 56A Appendix A (p14).		
	Marrons for Richborough, William Davis and Bowler Family	EXAM 58B	No issues with timeframe or rate of delivery for promoted site (HA15).	Comments are noted.		HA15
	Marrons for Richborough, William Davis and Bowler Family	EXAM 58D	Note calculations of five year housing land supply using the Sedgefield and Liverpool methods. Any shortfall in delivery should be addressed speedily, ie by using the Sedgefield method.	Comments are noted.		

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	Marrons for Richborough, William Davis and Bowler Family	EXAM 75	<p>1. No issue raised with approach set out in strategies but it is critical that delivery of any necessary projects can occur in a timely manner and in relation to any strategic allocations reliant upon them. There is otherwise a risk that approach will delay development. 2. Notes that some costs are provisional at this stage. 3. Approach to sharing of the costs required of developers across development schemes should be proportionate and comply with CIL Regulations. 4. The calculation of highway costs uses a catchment larger than the Borough and seeks to address existing problems.</p>	<p>Delivery of infrastructure is recognised as critical to development. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved. The mitigation package does not seek to address existing problems, the full mitigation package (as currently identified in conjunction with the transport strategies) is needed to mitigate the impacts of growth in the Borough. However, this will also have wider/ancillary benefits and it is not possible just to subdivide the scheme packages into elements that will 'only' address the impacts of development. Pooling is required due to the cumulative impact of development on the transport network. There is no restriction that mitigation can only be sought within a district boundary, impacts of development on the highway network are not constrained by administrative boundaries. This would effectively, at least for the moment under the current system, remain a 'duty to cooperate' matter between the relevant authorities.</p>		

FULL NAME	ORG DETAILS	EXAM DOC REF	REPRESENTATION SUMMARY	RESPONSE	LOCAL PLAN MODIFICATION (if required)	OTHER LP REF
	Marrons for Richborough, William Davis and Bowler Family	EXAM 76	<p>1. Land values are higher than set out in the report because outliers have been included. The report also confuses gross and net land values and is not consistent in the application of indexing with some costs, for example through reliance on rates from 2021. The identified education costs do not match those identified in the National School Delivery Cost Benchmarking report (2022). 2. The Report recognises that there is a funding gap between the amounts which are required to deliver the plan and the amounts that can reasonably be sought from developers through Section 106 contributions alone with alternative funding required from a range of Government sources. 3. The CIL tests place the burden of evidencing the need for planning obligations onto the requesting authority and need to be supported by clear and robust evidence. The findings of EXAM76 are sufficient to provide a direction of travel for the strategic planning of infrastructure, but cannot form the basis for understanding contributions required from individual developments and it will be necessary for up to date assessments to explore contributions and viability.</p>	<p>We welcome the view that EXAM76 is sufficient to provide a direction of travel for the strategic planning of infrastructure and accept that detailed assessment will be required to inform detailed assessment of Section 106 negotiations in accordance with the CIL Regulations. The benchmark land value assumptions are set out on Page 41 of the February 2021 Viability Assessment (EB/I&D/ 1). This shows the gross and net assumptions. The methodology and emerging findings were sense checked at a stakeholder workshop of developers at that time. The latest Viability Assessment (EXAM76) includes the latest transport and education costs as well as updated costs and values (see paragraph 1.9 of EXAM76). The education costs were assembled from advice from Leicestershire County Council as the education authority. Leicestershire County Council does not contribute data to inform the National School Delivery Cost Benchmarking Report (NSDBR). The NSDBR shows a wide variation in costs across the country. Although the County Council has regard to the NSDBR data their figures reflect actual cost estimates based on recent experience in Leicestershire. The infrastructure funding gap is acknowledged and additional public sector funding will be required over the lifetime of the plan.</p>		
	Marrons for Richborough, William Davis and Bowler Family	EXAM 76 continued	<p>4. Site HA15 is to be the location for a new primary school. There is not currently a delivery strategy in place to achieve this in a way that ensures an appropriate collective delivery of infrastructure projects and a process to ensure they are viable.</p>	<p>CBC is promoting discussions with developers to ensure school delivery where this is identified in policy. of the sites where new primary schools will be required by policy and this includes Site HA15. EXAM70, the Barrow Education Delivery Strategy illustrates an approach which the Council would hope to replicate elsewhere.</p>		
	Marrons for William Davis	EXAM 75	<p>No issue with the principle of addressing the impacts of the plan's growth through enhancing sustainable transport measures, targeted improvements to the major road network and targeted improvements to the strategic road network. However concerned that the sustainable transport measures are seeking to address existing deficiencies within the network and have not separated out what needs to be provided/developed in order to mitigate the impacts of new development proposed within the new Local Plan. It is noted that paragraph 3.1.4 states that individual developments will also need to address their more local impacts. 2. It would have been useful if the Council had set out what infrastructure needs to be delivered to ensure the first five years of deliverable sites could be achieved and what mitigation could come forward at a later date.</p>	<p>Delivery of infrastructure is recognised as critical to development. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. The Local Plan evidence base provides the justification for the package of measures to mitigate growth, development will not be required to address existing problems.</p>		

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	Marrons for William Davis	EXAM 76	<p>1. At this stage it is difficult to comment without knowing the costs of infrastructure required to be delivered as a direct result of new development and those costs that are needed to be met to address existing deficiencies within the network, which should not be borne by the development sector. There is insufficient information to understand what costs developers will be expected to pay, particularly as it is stated in the transport strategies that part of the sustainable transport measures for which national funding is available. 2. The highway improvement schemes have estimated cost values of £47,000,000. It must be stressed, however, that this is based on May 2022 prices with no allowance made for inflation. Furthermore, some of these schemes are still in development so their conceptual designs may change in the future which will impact on the estimated costs. These figures therefore must be treated with caution. 3. It is unclear how the cost figures for primary schools are derived and it would be useful to see the evidence that has been used. The costs for the secondary school and post 16 provision are based on the costs of a recent new school rather than extensions/alterations to existing schools, and do not seem to be appropriate. A review of recent planning permissions granted highlights that S106 contributions for educational purposes (which include a mix of primary, secondary, and early years provision) are lower than those being sought.</p>	<p>Section 106 negotiations for individual sites will be undertaken in accordance with the CIL Regulations. The Borough Council is working closely with Leicestershire County Council to ensure that infrastructure is funded appropriately as the local plan is implemented. Collaborative work is underway to determine the most suitable source of funding for highway and sustainable transport infrastructure, and where developer contributions will be directed to achieve most benefit. It is accepted that high rates of inflation will impact on construction costs. This will need to be factored into future cost estimates for individual developments. Paragraphs 6.39 to 6.47 of EXAM76 set out how the education costs were derived. Leicestershire County Council advised that the cost of school extensions is broadly comparable to new school costs. Cost inflation in school construction has risen considerably in recent years and it is important that sufficient allowance is made for this going forward.</p>		
Mr and Mrs Cunnington	N/A	EXAM 75	<p>Object to HA15, HA16 and HA17. Unhappy with the approach to transport assessment in Para 3.1.4 of EXAM 75. Disagree with the approach to transport assessment as part of the planning application stage which would not consider the cumulative impact rather than at plan making stage. The local road network was not designed to cope with such a large increase in traffic that would result from these developments. .</p>	<p>The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19.</p>		
Mr and Mrs Rasaiiah	N/A	EXAM 75	<p>Objects to Para 3.1.4 of EXAM 75 regarding the assessment of site related impacts of transport by developers at planning application stage. Concerned that the cumulative impact of HA15, HA16 and HA17 will be missed. The County Highway Authority should undertake a full assessment of the cumulative impact to inform decision making.</p>	<p>The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19.</p>		HA16

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Mr and Mrs Rasaiiah	N/A	EXAM 76	There is a need to reflect special Charnwood Forest policy requirements in the consideration of viability as well as off site transport. At least 40% of the sites should be set aside for green infrastructure (and provision made for its maintenance) and housing densities reduced.	The Viability Assessment is based on typologies rather than individual allocations. Policy EV4 of the Draft Local Plan sets out policy for Charnwood Forest and the National Forest. The policy includes reference to the National Forest Planting Guidelines which would need to be taken into account at the planning application stage. Planning applications would also need to have regard to the full suite of environmental and landscape considerations.		HA15, HA17, EV4
	Natural England	N/A	No comments.	Noted		
Nigel Trasler	N/A	EXAM 75	Cumulative impacts of HA15, HA16, HA17 & HA19 will be ignored if LCC do not carry out the transport assessments. LCC are the highway authority and must be responsible for transport assessment of cumulative impacts. No single developer will pick up cumulative infrastructure requirements to prevent the Grange Park estate becoming dysfunctional eg parking problems on Haddon Way possibly require a parking bay. Laburnum Way, Highlands Drive and Laurel Road need to be fully assessed through cumulative impact assessment. There is no bus service to most of Grange Park, innovative solutions are needed, much the same as some rural areas. LCC must be the independent authority responsible for a transport plan for the cluster of development around Grange Park and set out how mitigation can be funded and delivered.	The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19.		HA15, HA16, HA17, HA19
Nigel Trasler	N/A	EXAM 76	Greenfield viability appraisal is not appropriate for HA16 & HA17 as they need to reflect the Charnwood Forest policy requirements and Inspectors should be satisfied they are deliverable taking these into account along with offsite transport infrastructure. These policy requirements need some variations to the viability input assumptions, consider likely that 40% of land will need to be set aside for green infrastructure. Density need to be reduced to 25 - 30 dwellings per hectare. Need to demonstrate costed management plans for green infrastructure and how revenue costs will be funded, demonstrating allocations are deliverable whilst meeting requirements for affordable and lifetime homes and additional off site transport costs.	Policy EV4 of the Draft Local Plan sets out policy for Charnwood Forest and the National Forest. The policy includes reference to the National Forest Planting Guidelines which would need to be taken into account at the planning application stage. Planning applications would also need to have regard to the full suite of environmental and landscape policies in the plan. There was however no specific Charnwood Forest typology in the viability assessment so this was not a factor that was considered as impacting on viability. However, for medium to large greenfield sites the net to gross ratios are 83% to 63%.		DS3, HA16, HA17
	Nottinghamshire County Council		No comments.	Noted		
	P&DG for William Davis and Chapman Estates	EXAM 57	The Sustainability Appraisal appropriately identifies and assesses reasonable alternative approaches to address Leicester City's unmet housing needs. Agree that Option 1. is the most sustainable option and aligns with the NPPF. The plan's draft housing allocations are proposed because of their sustainability credentials. Intensification is supported. Anstey is a sustainable location and HA43 is well located to provide for unmet need from Leicester.	The support for the SA process and for site intensification is noted.		

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	P&DG for William Davis and Chapman Estates	EXAM 56A, EXAM 58B	Updated housing trajectory reflects delivery rates of allocated sites but is not a ceiling for individual sites or the plan as a whole. Site HA12 has the potential to provide for more housing. Higher capacity set out for HA43 is supported.	Comments are noted. Flexibility in relation to site capacities has been addressed through proposed main modification MAIN2.za (EXAM 4 060223, p16 (NOTE Further modifications to clarify the wording were also agreed).		HA12, HA43
	P&DG for William Davis and Chapman Estates	EXAM 75	Transport Strategy supported in principle, subject to thorough testing and justification of outputs. A range of funding sources will be required for strategic highway schemes. This could include pooled developer contributions subject to satisfying the CIL Regs. The development and refinement of the transport strategies over the plan period will enable the detailed costs to be further developed and for specific bids for funding to be made. The Transport Strategies support plan led growth with an emphasis upon sustainable transport measures and the promotion of active travel. To constrain plan led growth and housing delivery on the basis of existing constraints to the highway network would undermine the incentivisation of sustainable transport.	Support for the plan's approach is noted.		
	P&DG for William Davis and Chapman Estates	EXAM 76	The assessment fails to index costs from the original Viability Appraisal (Feb 2021) (land values, finance costs); it fails to reflect changes in circumstances/policy since the original appraisal (BNG costs and its impact on gross/net splits, future homes standard); and, it makes incorrect assumptions in the original appraisal (no abnormal costs, land values, agricultural values, EUV uplifts). Further updates are required to account for higher school build costs as set out in EXAM4 ,February 2023. It is however recognised that the viability assessment demonstrates a viable plan. Costs for transport and education are overestimated eg North of Leicester LCWIP also includes parts of Blaby. The LCWIPs also include measures to improve the existing situation which would not meet the CIL tests. Agree that further work will be required to monitor and manage infrastructure. Additional public sector funding will however be required to make up for expected shortfall. Funding gaps can be provided for later in the plan period, by which time the Transport Strategy will have been developed and the local plan itself will be subject to review. Strongly support the plan led system.	Support for the plan led system is welcomed. It is agreed that further work will be required to monitor and manage infrastructure and that additional public sector funding will be required to make up for the expected shortfall. It is agreed that the lengthy timescale of the local plan will allow for funding gaps to be addressed in the plan period. The first Viability Assessment was published in February 2021 (EB/I&D/1) and there have since been a number of iterations of the viability work to take account of changes in costs and values. The aim of the Consolidated Addendum Report (EXAM76) was to prepare a report that supersedes the previous addendums and links to the original viability report. The brief is set out in paragraph 1.9 of EXAM76 and Section 4 sets out the Viability Assessment Method. EXAM76 includes updated BICS construction costs, HPI based house price changes and changes to Part L of the Building Regulations and Future Homes Standard. The comments on the methodology are noted. The most recent school costs were based on advice from Leicestershire County Council.		

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	P&DG for William Davis and Chapman Estates	EXAM 76 continued	See above	The comments on the LCWIPs are noted. The full mitigation package (as currently identified in conjunction with the transport strategies) is needed to mitigate the impacts of growth in the Borough; however, this will also have wider/ancillary benefits and it is not possible just to subdivide the scheme packages into elements that will 'only' address the impacts of development. Pooling is required due to the cumulative impact of development on the transport network. A primary aim of the transport strategies will be to improve access to sustainable travel which cannot be appropriately addressed on a site-specific basis and will benefit new residents, encouraging modal shift. In addressing existing shortfalls in sustainable transport infrastructure as part of a mitigation package promoting sustainable development the need to create additional highway capacity to provide for travel by car is minimised. For example, by improving an existing 'poor' passenger transport services or upgrading walking and cycling infrastructure to comply with LTN1/20 / Active Travel England 'objectives'.		
	Pegasus for Davidsons (HA43)	EXAM 57	With specific reference to Land North and South of Groby Road Anstey, Davidsons welcomes the proposed new draft allocation figure of 714 dwellings (up from the originally proposed 600 dwellings). Flexibility should be provided to allow for higher numbers.	The comments are noted. Flexibility in relation to site capacities has been addressed through proposed main modification MAIN2.za (EXAM 4 060223, p16 (NOTE Further modifications to clarify the wording were also agreed).		
	Pegasus for Davidsons (HA43)	EXAM 56A	The proposed numbers should be "at least" to provide for flexibility. It is recommended that the capacity is further increased to reflect the capacity proposed in the live planning applications.	Local Plan Policy DS1: Development Strategy states that provision for at least 19,461 new homes will be made. The allocated sites in the local plan are those sites which best meet the development strategy of the plan. Planning applications for other sites may come forward during the course of the plan and will be assessed on their merits. Flexibility in relation to site capacities has been addressed through proposed main modification MAIN2.za (EXAM 4 060223, p16 (NOTE Further modifications to clarify the wording were also agreed).		

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	Pegasus for Davidsons (HA43)	EXAM 58	The five-year supply figure of 5.16 years is marginal and does not provide the needed confidence that the Local Plan will deliver homes quickly following the adoption of the Local Plan. This suggests that a further increase in supply is needed. Projecting forward windfall rates is overly optimistic.	EXAM 58B sets out five year housing land supply calculations for adoption in 2023/24 as 5.16 years (Sedgefield method) and 5.89 years (Liverpool method). For adoption in 2024/25 EXAM 58B sets out figures of 5.74 years (Sedgefield) or 6.86 years (Liverpool). The housing land supply position and the evidence supporting it were considered as part of Matter 7. The number of homes delivered on windfall sites is provided in the Council's original matter statement (Q7.4). The Council was able to demonstrate a five year housing land supply for 4 of the most recent 10 years (the period used to calculate the projected rate).		
	Pegasus for Davidsons (HA43)	EXAM 75	There is currently no mechanism to support the cost of the proposed allocations. Development is only required to mitigate its own impact. Agreements with land owners will already have been negotiated based on achieving minimum land values which will not have taken into account the additional infrastructure expenditure. The per dwelling S.106 cost will need to be set out in a SPD.	Section 106 agreements which are negotiated as part of planning applications need to have regard to the CIL Regulations and therefore must be necessary, directly related and fairly related in scale and kind to the development. The agreements that developers make with landowners is outside the scope of the local plan process, but development costs should have been factored in to the agreements.		
	Pegasus for Davidsons (HA43)	EXAM 76	Section 106 costs in the Viability Assessment are at the margins of viability. A funding gap is apparent and additional public sector funding will be necessary. Sites which have already gained planning permission were not discounted. Reference is made to Leicestershire County Council Cabinet of 24th October which sets out figures of £140m for education and £183m for transport. Reference is made to the numbers of dwellings which have already received planning permission. Further work is required to manage schools and highway infrastructure requirements and more detailed viability assessment is likely to be required at planning application stage. A mechanism should be put in place to implement the Section 106 costs through a future SPD which would need to be subject to extensive consultation and viability testing. Further development should be allocated to meet the funding gap and counteract the potential loss of affordable housing. Allocated sites which are yet to gain planning permission should not be expected to fund the infrastructure funding gap.	The Viability Assessment found a funding gap based on the package of transport and education costs which was assessed in August 2023 (EXAM76). In recognition of the funding gap discussions with Leicestershire County Council are ongoing to agree the way forward for infrastructure funding and over the timescale of the local plan other sources of public funding will be necessary. Allocated sites in the local plan which have not gained planning permission will provide transport infrastructure in accordance with Policy INF2, as modified by EXAM 19. This provides the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism in accordance with the CIL Regulations. Collaborative work between CBC and LCC is being progressed to ensure this is achieved. The purpose of the viability assessment was to test the viability of the whole plan. It is based on typologies rather than actual sites.		

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	Pegasus for Davidsons (HA43)	EXAM 76 continued	See above	The Council does not agree that the viability of the plan would benefit by allocating additional sites because the preparation of the plan has been based on a robust process of site selection having regard to key planning criteria to achieve sustainable development. If more sites were to be included then the infrastructure needs would be likely to increase. The means of implementation of policy is subject to ongoing discussions with Leicestershire County Council as the transport and education authority. Any future agreements which would result in new planning documents would be include the opportunity for full consultation with affected parties.		
	Pegasus for Davidsons (Markfield)	EXAM 57	Option 1 (Site Intensification) considered preferable due to lesser negative effects; however, question if this is most appropriate for all sites if it has not been demonstrated the site can adequately mitigate development. Will also impact on existing infrastructure without any new benefits (open space, landscape, ecology etc). New allocations have greater certainty and perform only marginally worse.	Comments regarding the benefits and disbenefits of different options are noted. The SA has considered these and reached a balanced conclusion.		
	Pegasus for Davidsons (Markfield)	EXAM 56A	The additional need is met by maximising supply on existing allocations rather than new sites as they have been through a site selection process. Supported but raises concern over not enough housing and lack of flexibility	Comments are noted. The plan has had a buffer of approximately 10% from submission onwards. This issue has been examined in relation to Matters 4 and 7.		
	Pegasus for Davidsons (Markfield)	EXAM 58	Marginal five year supply figure 23-28 does not provide confidence the Plan will deliver homes quickly and further supply is needed. Windfall allowance based on historic completions where no up to date plan or 5 year supply exist. Projecting forward is very optimistic.	EXAM 58B sets out five year housing land supply calculations for adoption in 2023/24 as 5.16 years (Sedgefield method) and 5.89 years (Liverpool method). For adoption in 2024/25 EXAM 58B sets out figures of 5.74 years (Sedgefield) or 6.86 years (Liverpool). The housing land supply position and the evidence supporting it were considered as part of Matter 7. The number of homes delivered on windfall sites is provided in the Council's original matter statement (Q7.4). The Council was able to demonstrate a five year housing land supply for 4 of the most recent 10 years (the period used to calculate the projected rate).		
	Pegasus for Davidsons (Markfield)	EXAM 75	Transport strategy contains improvements costing £183m obtained from public & private sector funding. Planning obligations must meet the CIL test and the strategy shows no mechanism to support costs for proposed allocations. Development is only required to mitigate its own impact. Developers have signed agreements with landowners based on known infrastructure costs, these are additional costs for offsite infrastructure and may impact upon affordable housing provision. An SPD, including public consultation, is needed to implement these requirements.	Section 106 agreements which are negotiated as part of planning applications need to have regard to the CIL Regulations and therefore must be necessary, directly related and fairly related in scale and kind to the development. The agreements that developers make with landowners is outside the scope of the local plan process, but development costs should have been factored in to the agreements including anticipated Section 106 contributions. These costs would be negotiated as part of the planning application process in accordance with the CIL Regs.		

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	Pegasus for Davidsons (Markfield)	EXAM 76	Contributions are at the margins of viability and more flexibility is needed to allow for unexpected onsite costs. Demonstrates a funding gap between infrastructure requirements and developer contributions. Developers cannot pay full infrastructure costs, additional public sector funding is required. The total S106 funding delivered would be only marginally higher than the overall highways package. An SPD, subject to consultation and viability testing, is required to support Local Plan delivery. Further development should be allocated to meet the funding gap and counter act the potential loss of affordable housing.	The comments on viability are noted. The latest viability assessment (EXAM76) was used to assess how much could be sought from developers to fund infrastructure for each development typology and cumulatively for the plan as a whole. Additional funding from the public sector will be required over the lifetime of the plan. We do not agree that additional sites should be allocated to help meet the funding gap because additional housing development would increase infrastructure requirements to mitigate growth.		
	Pegasus for Redrow/ HJC Trust	N/A	Detailed submission in support of additional allocation at Watermead Lane, SW of Loughborough including landscape and ecological assessments, masterplans and pre-application advice.	Noted		Watermead Lane Omission
	Pegasus for Redrow/ HJC Trust	EXAM 57	1. Site intensification (option 1) may be appropriate in certain circumstances, for example where detailed master-planning as part of planning applications has identified additional capacity. However in other circumstances it may not enable biodiversity net gain to be achieved or sufficient open space to be provided. Landscape mitigation would also be particular to each site. 2. The alternative of providing a new site under Option 2 to meet the additional need would provide additional benefits in terms of open space provision, ecological and landscape improvements. Appraisal of site as part of option 2 does not address opportunities for mitigation or the opportunities of a more comprehensive SW Loughborough development. Instead, the SA places significant weight on how development could lead to moderate negative effects.3. Detailed elements of appraisal of PSH467 in relation to landscape and biodiversity disputed. These also conflict with the pre-application advice provided by the Council. 4. The dismissal of Option 2 and PSH467 as an allocation is not adequately justified, as the evidence submitted on behalf of the developer/landowner has not been properly considered.	All SA reports have taken a consistent approach to assessing the impact of development and its mitigation which is set out on pp75-76 of EXAM 7. It should be noted that biodiversity net gain could be achieved off-site, which would contribute to overall effects for the borough (though acknowledging that on site measures would be preferable in most instances). Potential Moderate negative effects are only identified with regards to one SA topic (landscape) for Option 2 and this is considered to be justified given the sensitivity of the location. The SA does not place greater weight on landscape (or other SA topics) it simply identifies potential effects for each option, but acknowledges the potential for mitigation and enhancement. With regards to the Option 1, a blanket approach has not been taken whereby capacity is increased on every site allocation. The Council have only identified locations where increased densities are considered to be appropriate.		
	Pegasus for Redrow/ HJC Trust	EXAM 56A	There is a fine balance between providing Biodiversity Net Gain on sites and delivering housing numbers. In the case of HA60 the increase in capacity from 223 homes in the submitted plan to 270 in an outline permission had to be readjusted to 258 for the reserved matters application following masterplanning work. Furthermore, the intensification of some proposed sites, for example Site HA35 Land North of Hallamford Road and West of Shepshed, where there are significant environmental constraints such as flood risk and site topography, may mean that achieving a higher number of dwellings might not be deliverable.	The capacity for HA60 has been adjusted to 256 in EXAM 56A (p12) and EXAM 58C. HA35 was considered for intensification but it was concluded this was not appropriate for landscape and infrastructure reasons (EXAM 56A, p14).		

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	Pegasus for Redrow/ HJC Trust	EXAM 58D	The housing trajectory includes a 63 dwellings per year windfall allowance from 2026/27. This projection is based on historic completions in a scenario prior to the adoption of the Local Plan where there has been no 5 year supply and thus the likelihood of speculative applications being successful and contributing to delivery is far greater – to simply project this rate forwards is therefore misconceived. The 5 year period on adoption of the Local Plan is 2023 – 2028, and at 1st April 2023 the document claims that there is a 5.16 year supply, which is marginal.	The number of homes delivered on windfall sites is provided in the Council's original matter statement (Q7.4). The Council was able to demonstrate a five year housing land supply for 4 of the most recent 10 years (the period used to calculate the projected rate). EXAM 58B sets out five year housing land supply calculations for adoption in 2023/24 as 5.16 years (Sedgefield method) and 5.89 years (Liverpool method). For adoption in 2024/25 EXAM 58B sets out figures of 5.74 years (Sedgefield) or 6.86 years (Liverpool).		
	Pegasus for Redrow/ HJC Trust	N/A	The Local Plan is now not due to be adopted until 2024, which would mean that the plan will fail to cover the minimum 15 year period from adoption as required by paragraph 22 of the NPPF. If the plan is adopted before 31st March 2024 the plan period should be extended to 2039, which is an additional two years. If the plan is adopted after 31st March 2024, consideration should be given to extending the plan period to 2040. This would increase the housing requirement and further highlights the importance of considering new allocations (Option 2), rather than solely focusing on intensifying existing sites.	The plan period was the subject of discussion as part of Matter 1. The Council's written statements can be found in response to Q1.21 of the original statement and Q1.3 of the supplementary statement.		
	Pegasus for Redrow/ HJC Trust	EXAM 75	1. The strategies are proposed to be funded through a roof tax approach, whereby each dwelling in its strategy area contributes proportionately to the total costs identified. The legal basis for such a strategy is however dubious and has not been properly demonstrated (see Aberdeen City v Elsick [2017] UKSC 66 – Appendix 7). The Community Infrastructure Levy was introduced because it is not lawful to introduce a generalised tariff based approach to raise money from development to fund infrastructure in the manner proposed. It would be useful to understand whether the Council has sought legal advice on that point. 2. The cost allocation is counterintuitive, in that the most sustainable location to develop (North of Leicester) will attract the greatest contribution, and the least sustainable, where reliance on the car is greatest, is cheapest (Soar Valley). 3. The document notes that the costs are based on 2022 prices and could increase over the course of the plan, and that public funding will be required to deliver the strategies.	Developer contributions will be negotiated through S106 agreements as part of the process for determining planning applications in accordance with the CIL Regulations and therefore must be necessary, directly related and fairly related in scale and kind to the development. Collaborative work between CBC and LCC is being progressed to ensure this is achieved. The cost allocation would be determined by the infrastructure required to mitigate the impact of development. It is not intended that any funding shortfall would be made up by future applications. The agreements that developers make with landowners is outside the scope of the local plan process, but development costs should have been factored in to the agreements including anticipated Section 106 contributions. These costs would be negotiated as part of the planning application process in accordance with the CIL Regs.		

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	Pegasus for Redrow/ HJC Trust	EXAM 75 continued	<p>4. Charnwood Borough Council is not proposing that the Local Plan will include a policy to set a requirement for a per dwelling contribution towards highways infrastructure. In order to implement the per dwelling Section 106 costs, this will need to be converted into policy through a future SPD, and subject to the necessary public consultation process, taking account of the Viability Report. We question such an approach which would seem to be at odds with NPPF paragraph 34. 5. Many allocations will have received planning permission by the time that process, or an update to the County Council's Planning Obligations Policy have been completed. This must not place a greater burden on future planning applications (including allocations) to meet the shortfall in funding, which will not be viable. Promotion agreements will have been agreed without the inclusion of these additional costs. Those costs may therefore impact negatively on delivery and/or result in schemes coming forward that do not deliver policy compliant affordable housing given the per dwelling financial contribution proposed to cover highways, education and other offsite infrastructure costs. 6. It is therefore suggested that the Council needs to allocate additional sites to both contribute towards the necessary infrastructure, and sufficient housing supply and affordable housing delivery across the plan period.</p>	<p>Developer contributions will be raised through S106 agreements which are negotiated as part of planning applications which need to have regard to the CIL Regulations and therefore must be necessary, directly related and fairly related in scale and kind to the development. Collaborative work between CBC and LCC is being progressed to ensure this is achieved. The cost allocation would be determined by the infrastructure required to mitigate the impact of development. It is not intended that any funding shortfall would be made up by future applications. The agreements that developers make with landowners is outside the scope of the local plan process, but development costs should have been factored in to the agreements including anticipated Section 106 contributions. These costs would be negotiated as part of the planning application process in accordance with the CIL Regs.</p>		
	Pegasus for Redrow/ HJC Trust	EXAM 76	<p>There is a minimum funding gap of at least £120m. It is important to note that approximately 16% (1,500/9,300 LCC Cabinet 24th October 2023 report figure) of Local Plan allocations already have planning permission and therefore will not be contributing to the Local Plan infrastructure costs required. This must not add an additional financial burden to the remaining Local Plan allocations, which will continue to increase with the approval of further planning applications prior to the implementation of any future revised policy to accord with NPPF and/or SPD to secure additional Section 106 contributions towards infrastructure. Whilst the report at Table 6.7 includes residential cost assumptions in relation to 'net biodiversity' for brownfield/greenfield sites on a per dwelling basis, it is unclear whether this cost assumption would also cover the costs of providing Biodiversity Net Gain offsite if provision cannot be made onsite. Approximately 16% of Local Plan allocations (approximately 1,500 dwellings) already have outline planning permission and have not contributed to the strategic highway infrastructure. The allocation of additional sites through the Local Plan to compensate for this further shortfall in contributions would help significantly with ensuring that the already large funding gap is not even greater.</p>	<p>The Viability Assessment found a funding gap as a result of the package of transport and education costs. Discussions with Leicestershire County Council are ongoing to agree the way forward for infrastructure funding. Additional public funding will be necessary over the timescale of the plan. It is acknowledged that some local plan allocations have received planning permission already. Allocated sites will only be expected to contribute towards transport infrastructure in accordance with the CIL Regulations. The purpose of the viability assessment was to test the viability of the whole plan. It is based on typologies rather than actual sites. The consideration of biodiversity net gain does not distinguish between on site and off site measures but is assessed as part of the development costs. Further viability work may be required at planning application stage if there are concerns about viability. The Council does not agree that the viability of the plan would benefit by allocating additional sites because the preparation of the plan has been based on a robust process of site selection having regard to key planning criteria to achieve sustainable development. If more sites were to be included then the infrastructure needs would be likely to increase.</p>		

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	Pegasus for Redrow/ HJC Trust	EXAM 76 continued	The evidence leaves significant gaps in the funding needed to secure the necessary infrastructure and therefore choices will need to be made about what development can contribute alongside the need to provide affordable housing and biodiversity net gain on or off site.	The Viability Assessment found a funding gap as a result of the package of transport and education costs. Discussions with Leicestershire County Council are ongoing to agree the way forward for infrastructure funding. Additional public funding is likely to be necessary over the timescale of the plan. It is acknowledged that some local plan allocations have received planning permission already. Allocated sites will only be expected to contribute towards transport infrastructure in accordance with the CIL Regulations. The purpose of the viability assessment was to test the viability of the whole plan. It is based on typologies rather than actual sites. The consideration of biodiversity net gain does not distinguish between on site and off site measures but is assessed as part of the development costs. Further viability work may be required at planning application stage if there are concerns about viability. The Council does not agree that the viability of the plan would benefit by allocating additional sites because the preparation of the plan has been based on a robust process of site selection having regard to key planning criteria to achieve sustainable development. If more sites were to be included then the infrastructure needs would be likely to increase.		
	Pegasus for Taylor Wimpey (HA1)	EXAM 57	The preparation and consultation on the Sustainability Appraisal Addendum is supported and our clients have no comments	The support for Sustainability Appraisal is noted.		
	Pegasus for Taylor Wimpey (HA1)	EXAM 56A	Whilst it is understood that the Council does not want to rely on delivering more than 960 homes on this site ahead of this work being complete, it is important that the potential to deliver more than 960 homes is not constrained, to ensure the land allocated can be used effectively and efficiently.	Flexibility in relation to site capacities has been addressed through proposed main modification MAIN2.za (EXAM 4 060223, p16 (NOTE Further modifications to clarify the wording were also agreed).		
	Pegasus for Taylor Wimpey (HA1)	EXAM 58	We can confirm that this is a realistic trajectory for the site and has been informed by discussions with our client. Pre-application engagement on the site is underway and an outline application will be submitted next year to enable delivery of homes in 2026/27.	Support is noted.		HA1

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	Pegasus for Taylor Wimpey (HA1)	EXAM 75	<p>Whilst the Local Plan policy will provide a framework for considering appropriate contributions, it will not be sufficient on its own to start requesting the roof tax style contribution being proposed by Leicestershire County Council. It is essential that any specific per dwelling developer contribution requirements are set out in an appropriate planning document and are clearly justified, taking account of the viability evidence prepared and consulted on. It should be noted that in the letter to Leicestershire County Council in August ahead of this consultation (Exam 74 A), that the Local Plan Examination Inspectors confirm that this is not a matter that will be resolved through the adoption of the Local Plan alone: 'The mechanism for, and documentation behind, the requirement for developer contributions is a matter for the authorities to resolve in due course'. Significant concern is expressed regarding the proposed approach to introduce policy outside of the planning process. Any roof tax style approach to developer contributions should be set out in an appropriate planning document after the adoption of the local plan.</p>	<p>The Borough Council is required to have regard to the CIL Regulations in negotiating Section 106 Agreements. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Discussions are ongoing with Leicestershire Council regarding the implementation of the transport strategies which is in accordance with the Inspectors response in EXAM74 which stated that the mechanism form and documentation behind, the requirement for developer contributions is a matter for the authorities to resolve in due course.</p>		
	Pegasus for Taylor Wimpey (HA1)	EXAM 76	<p>The viability assessment estimates the cost of the educational requirements of the Local Plan to be £140 million and the highways and transportation £183 million, a total of £320 million and this does not include all the other developer contributions which would be required. The Viability Assessment's figure of £200m does not take into account those allocations which have already gained planning permission. Each site is unique and there needs to be flexibility in the plan to ensure that the plan's policies are deliverable. It is likely that site viability will require further viability assessment at planning application stage. Draft policies H4 and INF1 provide sufficient wording to allow for further viability assessment if it is required. Significant concerns are raised regarding the proposal to introduce policy (in the shape of the Interim Transport Strategy) outside of the plan making process.</p>	<p>The Viability Assessment was based on a total figure encompassing a basket of Section 106 contributions. The amounts for transport and education are the largest amounts but the viability assessment also included other County Council contributions such as waste and libraries and other Borough Council contributions such as open space. Viability Assessment work has been informed by historic Section 106 contributions to calculate per dwelling costs. It is acknowledged that some allocations have gained planning permission since the plan was submitted. Specific characteristics for individual sites can be taken into account in viability considerations at planning application stage. Support for the wording of policies H4 and INF1 is acknowledged.</p>		

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	Pegasus for Taylor Wimpey (HA1)	EXAM 76 continued	<p>An appended report prepared by CBRE critiques the methodology of the Viability Assessment. Amongst the main concerns are: the residential value assumptions are unrealistically high which means that the 'headroom' is overstated; the lack of consideration given to the decline in market conditions; residential values are expected to further decline while construction cost inflation is projected to remain high; the rapid escalation in labour and materials costs; infrastructure costs for larger sites are omitted; the implications of Future Homes Standard have been underestimated; rising interest rates has meant that development finance is significantly more expensive; it is unclear whether in the case of HA1 additional allowance is made for the land cost of providing for a primary school and no consideration is given to cashflow profiling of Section 106 contributions. Further viability assessment is likely to be required at planning application stage and flexibility in the provision of affordable housing and Section 106 contributions should be retained in policy.</p>	<p>Viability assessment has sought to capture changes to costs which have occurred over the preparation of the plan. The Viability Assessment methodology is set out in Section 4 of EXAM76. With respect to the detailed methodological issues raised by CBRE it is agreed that since the initial viability assessment the residential market has experienced challenges and construction cost inflation and interest rates have risen. The typology based approach means that the full infrastructure needs of individual sites have not been specifically assessed but the scale of infrastructure needs of larger sites will be reflected by higher per dwelling costs. Sustainable construction was factored in to the development costs for viability purposes in the initial Viability Assessment (EB/I&D/1) and in EXAM76 the implications of Part L of the Building Regulations and the Future Homes Standard were assessed. Recent experience in developing a delivery strategy for a new primary school at Barrow upon Soar included the land cost within the overall distribution of costs between developers. The agreement between developers also had regard to cash flow profiling and we would commend this approach to other sites where a number of allocations will contribute towards school provision. The reference to affordable housing is noted.</p>		
	Pegasus for Taylor Wimpey (HA3)	EXAM 56A	<p>This is a realistic, although conservative trajectory for the site which is well progressed with a live outline planning application due to be considered at appeal on 14th November with no reasons for refusal identified by the Council.</p>	<p>Comments are noted.</p>		HA43
	Pegasus for Taylor Wimpey (HA3)	EXAM 75	<p>The Local Plan policy will not be sufficient on its own to start requesting the roof tax style contribution being proposed by Leicestershire County Council. It is essential that any specific per dwelling developer contribution requirements are set out in an appropriate planning document and clearly justified taking account of the viability evidence.</p>	<p>Leicestershire County Council has prepared transport strategies which set out the types of transport measures that will be required to mitigate the plan's development strategy. The strategies were submitted to the Examination (EXAM75) and in response the Inspectors stated that the level of detail was proportionate in relation to the level of evidence required at this stage of the examination and that the mechanism for, and documentation behind, the requirement for developer contributions is a matter for the authorities to resolve in due course. To achieve this outcome the Borough Council is in ongoing discussions with the County Council.</p>		

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	Pegasus for Taylor Wimpey (HA3)	EXAM 76	It is important to emphasise that the report identifies a maximum developer contribution figure, which the report describes as being right up to the margins of viability. Each site is unique and therefore there needs to be flexibility to ensure that the allocations proposed in the Local Plan are deliverable. In the circumstances set out in the Updated Viability Report, further assessment of viability will almost always be required at the planning application determination stage	The approach to viability testing was to gain an understanding of the maximum level of Section 106 funding which the plan could provide for. In this way it was clear how much additional public funding will be required to deliver the plan. The viability assessment is based on an appraisal of site typologies rather than actual sites and it is accepted that the viability of some allocated sites may need to be assessed as part of the development management process if justified by specific site characteristics.		
Rachel Hackett	N/A	EXAM 75	The impact of allocations HA15, HA16 and HA17 on the local environment and transport network should be taken into account. There is no public transport available to residents on much of the development and none could now be implemented due to the on street parking. The level of on street parking also makes walking and cycling dangerous. The strategy proposes that transport assessments will be left to individual developers to determine which is not appropriate.	The transport strategies provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth; this includes sustainable travel in the form of passenger transport and active travel initiatives. A primary aim of the transport strategy for Loughborough will be to improve access to sustainable travel. EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19.		

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Roger Smith	N/A	EXAM 75	Welcome the policy to encourage more sustainable travel. However, current infrastructure is nor being maintained; for example, the road markings for joint pedestrian/cycleway use are worn in many locations and when road markings are renewed, the cycleway markings are not. The strategy should therefore include a commitment to upgrade all the existing cycleway markings, and where there is joint pedestrian/cycle use and to expand the latter wherever possible and where conflicts can be avoided.	The strategies, through the LCWIPs, do identify existing infrastructure which form part of the overall transport strategy for an area. The full mitigation package (as currently identified in conjunction with the transport strategies) is needed to mitigate the impacts of growth in the Borough; however, this will also have wider/ancillary benefits and it is not possible just to subdivide the scheme packages into elements that will 'only' address the impacts of development. Pooling is required due to the cumulative impact of development on the transport network. A primary aim of the transport strategies will be to improve access to sustainable travel which cannot be appropriately addressed on a site-specific basis and will benefit new residents, encouraging modal shift. In addressing existing shortfalls in sustainable transport infrastructure as part of a mitigation package promoting sustainable development the need to create additional highway capacity to provide for travel by car is minimised. For example, by improving an existing 'poor' passenger transport services or upgrading walking and cycling infrastructure to comply with LTN1/20 / Active Travel England 'objectives'.		
	Savills for Redrow	N/A	Plan period less than 15 years. Should be extended by three years supported by updated LDS. Additional three years and additional buffer would result in requirement for upto 4,300 additional homes and additional sites. These should be allocated using the evidence from previous submissions and the current spatial strategy including service centres. Site at Ratcliffe Road, Sileby promoted.	The plan period was the subject of discussion as part of Matter 1. The Council's written statements can be found in response to Q1.21 of the original statement and Q1.3 of the supplementary statement. Other comments are noted.		Plan Period
	Savills for Redrow	EXAM 75	No clear mechanism for securing contributions as required by NPPF and PPG.	Developer contributions will be raised through S106 agreements which are negotiated as part of planning applications need to have regard to the CIL Regulations and therefore must be necessary, directly related and fairly related in scale and kind to the development. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. Developer contributions will be determined and sought through the development management process using the most appropriate mechanism. Collaborative work between CBC and LCC is being progressed to ensure this is achieved.		

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	Savills for Redrow	EXAM 76	Viability assessment identifies a funding gap of £120mn, without taking into account that some site allocations already have permission. In addition other sites have already agreed land values greater than those assumed which could result in those sites not coming forward.	The purpose of the viability assessment was to test the viability of the whole plan taking account of the full range of policies and requirements. It is based on typologies rather than individual site allocations so has not taken into account individual site land values. Policy INF2, as modified by EXAM 19, will provide the policy framework to seek developer contributions which comply with the relevant legislation, such as CIL Reg 122 and seek to mitigate the impact of development, including cumulative and cross-boundary impacts. The first viability assessment (ED/I&D/1) included a developers workshop on 30th September 2020 to sense check the methodology and the emerging findings.		
	Savills for Redrow	EXAM 56A	Criticism of the use of windfalls figure based on period without up to date plan or five year housing land supply. The predicted rate should therefore be reduced. Criticism of piecemeal intensification to meet apportionment of unmet need. Not good plan making and not supported by evidence of site capacities coming forward. Lack of evidence to support this approach compared to other options to meet need.	The number of homes delivered on windfall sites is provided in the Council's original matter statement (Q7.4). The Council was able to demonstrate a five year housing land supply for 4 of the most recent 10 years (the period used to calculate the projected rate). The reasons for choosing the intensification option are that the existing allocations have been identified through a systematic site selection process as the most suitable sites for sustainable development, securing higher densities in appropriate locations can help to ensure the efficient use of land, and that by focussing on proposals being made by promoters providing a level of confidence that the increased capacities could be achieved. The approach is supported in the sustainability appraisal of this option compared against others.		
	Savills for Wilson Bowden	EXAM 75	Note improvements to M1 J23 in the region of £15.1m based on May 22 prices with no inflation allowance, these are in addition to £38m to implement Loughborough LCWIP, Recognise evidenced need for targeted improvements to SRN in this location, whilst improvements are welcomed the Local Plan does not make clear which allocations will contribute. Developments in proximity will be expected to contribute in accordance with the CIL Regs; however, clarity on which sites along with public sector funding sources for these improvements is needed to demonstrate they are viable and deliverable. Development of land southeast of M1 J23 could provide a proportionate contribution to support delivery.	Development contributions will not be expected to fund the entire cost of the strategies. Contributions will be pooled to fund M1 J23 improvements. Evidence has considered impacts of growth, this did not include development at M1 J23 which may warrant further mitigation than currently identified.		

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	Severn Trent Water	OTHER - REP RELATES TO ALL ALLOCATED SITES AND WATER TREATMENT INFRASTRUCTURE	Detailed comments regarding wastewater network, wastewater treatment, wastewater strategy, surface water, SuDS, Blue Green infrastructure, water quality and water efficiency. Waste water infrastructure - Development of the following allocations could have a high potential impact on foul sewerage infrastructure: HA1, HA2, HA3 , HA15, HA16, HA31, HA32, HA33, HA34, HA45, HA46, HA48, HA49, HA59, HA66. Development of the following allocations could have a high potential impact on surface water sewerage infrastructure: HA1. In all these cases capacity improvements are likely to be required to accommodate the proposed development. Wastewater Treatment - Capacity at each Waste Water Treatment Works has also been assessed. Capacity improvements are likely to be required in the short term to accommodate population increases. Wanlip WwTW has very high capacity constraints as well as very high watercourse constraints. An enhancement scheme is underway with further enhancement schemes likely to be required. Long Whatton WwTW also has very high capacity constraints. Proposed Policy Wording - Policy wording is proposed for inclusion in the plan for Surface Water, Sustainable Drainage Systems (SuDS), Blue Green Infrastructure, Protection of Water Treatment Policy and Water Efficiency Policy. Water Supply - for the majority of new developments no connection issues are anticipated.	The representation provides a significant amount of detailed information to inform plan making and the implementation of the plan. The information provided is largely a restatement of information previously provided to the Council by Severn Trent Water at Regulation 18 Consultation. The representation acknowledges that sewerage undertakers have a statutory obligation to provide additional sewerage treatment facilities as and when it is required. The Council is appreciative of the information provided but it is not specifically related to any of the consultation documents.		
	Spitfire Homes	EXAM 58	Spitfire Homes site in Cossington was granted consent in Oct 2022 and S106 is near completion, this site should be included in the 5 year land supply document.	The site is included in EXAM 58E (p1) under reference P/21/1446/2.		
Steve Carter	N/A	N/A	Oppose building 1350 homes on the Grange Park Estate. Previous mistakes regarding traffic impact has meant dangerous driving conditions around key routes due to blind corners and parked cars forcing drivers into oncoming traffic. Mini roundabouts have parked cars forcing reversing manoeuvres if you meet a car. Road layout maximises the number of houses, not availability of car parking and safe travel. No confidence that developers planning their own site specific traffic impacts will produce safe plans. HA15, HA16 & HA17 will increase the burden on existing routes. Proposals have been rejected once due to traffic issues, why are they OK now? The traffic generated by the proposals will lead to a dangerous environment for pedestrians and road users.	The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as proposed to be modified.		HA15, HA16, HA17
	The Planning Bureau obo McCarthy and Stone	EXAM 76	Neither sheltered housing or extra care accommodation can support an affordable housing contribution, as evidenced in previous submissions. This was consistent with the Charnwood Affordable Housing Viability Assessment (EB/I&D/7). EXAM 76 agrees that it would not be unreasonable to set a nil affordable housing target for sheltered and extra care accommodation. CBC have ignored this, despite the evidence, leading to further viability assessment at the decision making stage and negotiations. Policy H4 is not currently justified by the evidence or national policy; therefore a Main Modification is necessary to exempt older persons housing from providing affordable housing in Charnwood. This would be consistent with evidence and ensure the Plan is justified and consistent with national policy.	This was considered as part of Matter 4 in the previous hearing sessions.		H4
	Thrussington Parish Council	N/A	The number of pupils attending the primary school has increased from 69 to 96 in recent years (against a capacity of 105). It is unlikely that there will be enough places for the numbers of primary aged children expected to live in new developments in Thrussington.	The plan has been prepared with input from the Local Education Authority which has not objected to these allocations.		HA67 HA68

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Tobias Moechel		EXAM 75	Concerned about the cumulative impact of HA17, HA16 and HA15 on transport infrastructure, in particular on Laburnum Way, Haddon Way and Highlands Drive. The additional 1350 dwellings will have a serious impact that needs to be considered fully. The approach set out in paragraph 3.1.4 of the Strategy which would leave this to individual developers is disagreed with.	The Borough-wide, plan-making transport evidence commissioned to support the Local Plan identifies a plan-wide strategy to mitigate the cumulative and cross-boundary impacts of growth. It does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19.		
	Woodhouse Parish Council	N/A	Concern re change in affordable housing requirement for villages from 40% to 30%	Policy H4 was considered as part of Matter 4. The approach is supported by evidence contained in the Housing Needs Assessment (EB/HSG/1).		Policy H4
	Woodthorpe Residents Association	EXAM 75	1. Welcome co-ordinated approach to funding mitigation of cumulative impacts. Proposed allocations of HA15, HA16, HA17 and HA19 should be considered cumulatively as key clusters to ensure a comprehensively master planned approach to assessing the combined impacts of these allocations. Cumulative impact of these developments on the internal estate roads of Haddon Way and Grange Park cannot be left to be assessed individually. Object to the approach set out in paragraph 3.1.4 of Exam 75 which sets out a site by site approach to site-specific impacts. The four sites should be assessed together. This approach is supported for HA16, HA17 and HA19 in the LCC Cabinet report of 23rd June 2023. 2. in order to make the plan sound it should be amended to require a transport assessment of the cumulative impacts of all four sites so that appropriate mitigation can be identified. 3. Also note that the site promoters suggest that the ultimate capacities of the sites could be greater than those set out in the plan. 4. Public transport infrastructure accompanying the original Grange Park development has not been delivered and the estate also suffers from major on street parking on key routes that are most likely to be impacted by the key cluster of allocations proposed.	The transport strategies provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth. Contributions towards mitigation will be sought by CBC through the development management process. EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19. These assessments will be evaluated by LCC as the local highway authority taking into account all relevant factors including cumulative new development and existing infrastructure. The transport strategies include sustainable travel in the form of passenger transport and active travel initiatives and a primary aim of the transport strategy for Loughborough will be to improve access to sustainable travel.		

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	Woodthorpe Residents Association	EXAM 75 continued	<p>5. There is a lack of public bus services requirements for the HA15, HA16, HA17 and HA19 sites. The requirement in Policy CC5 for new developments to be no more than 400 m walking distance from an existing bus stop will not be deliverable in the case of the HA16, HA17 and HA15 as there is not an existing bus service to connect into. 6. Plan should be amended to ensure that that some form of bus service solution is provided for the new developments HA15, 16, HA17 and 19 to ensure this essential service is available indefinitely and to improve the necessary sustainability of this area. 7. The document refers to improvements to the One Ash roundabout and other junctions on the A6004 which are welcomed. However, we cannot see any improvement measures for the Woodthorpe roundabout in the Transport Strategies. The Woodthorpe roundabout is highly dangerous for pedestrians and cyclists and Exam 75 should be amended to include an assessment and mitigation measures to improve the safety of the roundabout especially as the majority of the key cluster of developments will directly impact this roundabout.</p>	<p>The transport strategies provide the delivery tool for, amongst other measures, mitigation of the cumulative and cross-boundary impacts of Local Plan growth. EXAM 75 does not provide a detailed consideration of local road networks or develop specific mitigation measures for each individual site allocation. These will be more properly and appropriately identified through site specific transport assessments, undertaken in the context of the policies in the Plan, as modified by EXAM 19. These assessments will be evaluated by LCC as the local highway authority taking into account all relevant factors including cumulative new development and existing infrastructure. Contributions towards mitigation will be sought by CBC through the development management process. The transport strategies include sustainable travel in the form of passenger transport and active travel initiatives and a primary aim of the transport strategy for Loughborough will be to improve access to sustainable travel.</p>		
	Woodthorpe Residents Association	EXAM 57	<p>The conclusions set out in Table 4.1 which state 'Not cause significant adverse environmental effects' and Page 39 which state 'Minor negative effect' are disputed and contradict the wording in the reasoned justification for Policy DS3(HA16). The Sustainability Appraisal Addendum document should be amended to reflect the sensitivities of this site.</p>	<p>Table 4.1 and page 39 set out the impacts of the options to meet Charnwood's apportionment of Leicester's unmet need for housing. None of these options impact HA16. The overall development strategy and suitability of sites within it, as set out in the submitted Local Plan, have been examined as part of Matter 2 and Matter 6.</p>		
	Woodthorpe Residents Association	N/A	<p>Given the sensitivities of their locations, the allocations at HA16 and HA17 should not be considered as being appropriate for development in the emerging Local Plan. A previous application on part of site HA16 was refused. A new application for part of HA16 shows that despite policies seeking mitigations, a wholly inadequate approach is proposed to the landscaping and layout of such a highly sensitive area. This also demonstrates the need for stronger policy wording to reflect what is required. 2. The area has also suffered from flooding as a result of over development and poor flood mitigation measures and maintenance regimes. The Trent Rivers Trust has suggested improvements to blue infrastructure design. 3. The following wording should be added to Policy DS3(HA16): 'at least 40% of this sensitive allocation should be safeguarded and allocated for green and blue linear infrastructure corridors contained within the public spaces'. 4. The policy wording for the HA16 and HA17 allocations should be amended to incorporate the suggestions from the Trent Rivers Trust in relation to good blue infrastructure design.</p>	<p>The suitability of the allocations was considered as part of Matter 6. The site specific policies set out an appropriate set of mitigations to ensure sustainable development.</p>		HA16 HA17

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	Woodthorpe Residents Association	EXAM 76	<p>The allocations at HA16 and HA17 should be treated as "special cases" to avoid the urbanising effects of the developments impacting on the Charnwood Forest and create strategic wildlife corridors. This should allow for at least 40% of the land to be for green / blue infrastructure. Similarly, we expect there will be a need for considerable additional transport infrastructure to mitigate the impacts that are likely to be required as a result of the cumulative assessment of HA15, HA16, HA17 and HA19. These factors should be taken into account as part of the viability assumptions.</p>	<p>The Viability Assessment is a high level assessment of viability which considers the plan as a whole rather than individual allocations so it is not appropriate to consider the merits of "special cases". Individual planning applications will be determined having regard to the full range of planning considerations, in particular the policies of the local plan. This includes the suite of environmental policies concerning issues such as landscape, areas of local separation, Charnwood Forest and the National Forest, biodiversity and tree planting.</p>		
	Zayo	N/A	<p>The information provided to date is not sufficient to allow Zayo to fully assess what effect the future plans of Charnwood Borough Council have on Zayo's fibre optic network in the potentially affected areas. Given that the locations generally referenced in the proposed plans appear to potentially directly impact our major backbone electronic communications network, we have no choice but to protect our statutory interests under the Electronic Communications Code and hereby object to what is being proposed insofar as it may affect Zayo's electronic communications network. This letter and email thus constitutes a formal objection to the plans put forward by Charnwood Borough Council in the Charnwood Local Plan 2021-2037.</p>	<p>Zayo have been contacted to enable a discussion of the extent of any impacts on their network infrastructure.</p>		Development strategy