

Charnwood Borough Council
Development Management
Loughborough
Leicestershire
LE11 2TN

7 November 2023

For the attention of Ian Kemp, Programme Officer

Dear Sir

Charnwood Local Plan 2021-37, response to additional Exam Documents

Further to our letter dated 22 August 2021 (see attached Appendix A), we are now responding to an email from Charnwood Borough Council (CBC) dated 27 September 2023 advising of further updated documents which are available for review and comment.

As a local Residents Association representing Haddon Way and Grange Park to the south of Loughborough our comments are in relation to the proposed allocations at HA15, HA16, HA17 and HA19 as these will have the most impact on our local residents. Our main comments relate to:

- The County Council's Transport Strategies (Exam 75) and in particular paragraph 3.1.4 which relates to the lack of cumulative impact assessment), bus and other transport infrastructure.
- The contradictions in policy contained in SC/2 DS3 HA16 and the Sustainability Appraisal (Exam 57).
- The need to reflect the requirements in the Viability Appraisals (Exam 76) of the special Charnwood Forest policy requirements as set out in policy for SD/2 DS3 HA16 and HA17.

Recommendations are offered within this response so as not to simply object, but to offer a clear path for developing a satisfactory mutual outcome with the Haddon Way Resident Association (HWRA). These are the people who intimately understand the sites, its constraints, its sensitivity and are keen to avoid the wide-ranging development failures of the past.

1. Draft Transport Strategies Exam 75 and cumulative impact para 3.1.4

1.1. In relation to offsite transport impact, Paragraph 3.1.3 of Exam 75 states '*This is particularly important in the context of the approach to the distribution of housing set out in the submitted Local Plan. The new allocations are predominately made up of non-strategic sites and instead comprise a **large number of relatively smaller developments across wider geographic areas**, such that the cumulative impact of the developments causes the severe impacts identified since it is **clear that no individual development will be able to deliver the necessary mitigation**. This requires a coordinated approach to ensure appropriate infrastructure and other services can be funded. Managing impacts on an ad-hoc case-by-case basis through the planning process will not support sustainable development in this instance.'*

1.2. We welcome the approach set out in paragraph 3.1.3 concerning the cumulative assessment of transport infrastructure requirements and the adoption of a coordinated approach to funding this requirement. Though it is not clear how the Transport Strategies define the term '**relatively smaller developments across wider geographic areas**' and we come back to this point below based on the County Councils own previous response and approach to grouping clusters of these smaller developments.

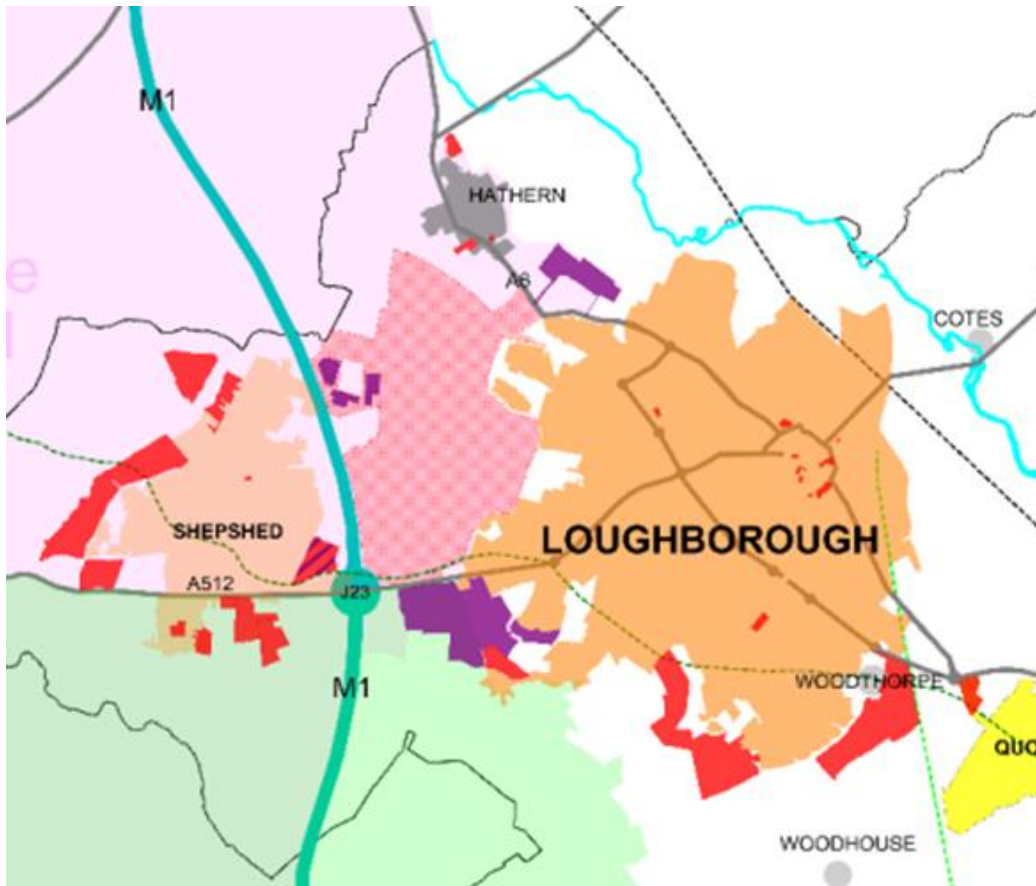
1.3. However, in relation to the offsite transport impacts on the wider Grange Park area, Paragraph 3.1.4 of Exam 75 states '*The Strategies are not intended to deal with more **localised impacts of a particular development site**. There will continue to be a requirement for developers to assess and **determine their site-specific impacts and mitigation requirements**. The onus will be on developers to demonstrate this through their transport assessments developed in support of planning applications, whilst the Plan-led mitigation strategy will provide the overarching framework of prioritised and phased measures which mitigate the cumulative and cross boundary impacts of Plan-level growth*'.

1.4. We strongly object to the approach proposed in paragraph 3.1.4 of Exam 75 as we consider the impact of the 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, and indeed, in June this was also the County Highway Authority's preferred approach too.

1.5. The plan overleaf extracted from SD/2 page 25 shows the proximity of HA15, HA16, HA17 and HA19 surrounding the Haddon Way and Grange Park area like a halo and it is clearly evident that these will all have a cumulative impact on the internal estate roads of the Haddon Way and Grange Park. These cannot be left to be assessed individually by promoters of each scheme. As the combined total of these allocations will result in over 1,365 houses with potentially over 3000 additional car journeys, which in our view is not relatively small. They must be considered holistically as part of the County Council's Transport Strategies assessment informing the 'deliverability and soundness' of this Plan.

1.6. We also wish to remind the Inspectors that there is no agreement with Bloor Homes over the total number of homes identified at HA16 based on the published Statement of Common Ground (Exam 24 H), so this total number of 1,365 houses at HA15, 16, HA17 and 19 could increase.

1.7. We cannot understand why the Local Plan SD/2 and Exam 75 has identified HA16, HA17, HA19 and HA15 as separate allocations when it is clear that their impact will be cumulative on the estate in just the same way as education infrastructure requirements have been considered cumulatively in the Local Plan for these allocations. The **onus cannot be left to individual site promoters** to inform CBC of the impact of their bit of a development when this will not consider the cumulative effect of the adjoining developments in the Plan. In our experience these traffic assessments are prepared by specialists commissioned by the developer and are therefore written in their favour to demonstrate little or no impact and thus concluding with little or on mitigations is required.



Extract from SD/2 page 25 showing the close proximity of HA15, 16, 17 and 19 surrounding Grange Park Estate area

1.8. We would like to draw the Inspectors attention to the Leicestershire County Council Cabinet Joint Report of the Chief Executive and the Director of Environment and Transport dated 23rd June 2023, a copy of which we have attached to this response as Appendix B. In this document, in relation to the Charnwood Borough Council's Local Plan, the County Highway Authority (CHA) specifically states, in response to Policy DS3: Housing Allocations, as show in the extract overleaf that *'furthermore, Policy DS3 could be helpfully strengthened to ensure a comprehensively master-planned (and thereby coordinated) approach is taken to key clusters of adjacent sites. In particularly this applies to ...Sites to the south-west of Loughborough – HA16/HA17/HA19.*

1.9. It is clear from this extract from Appendix B, that the County Council too believes the right approach to adopt is to assess the cumulative impact of key clusters of adjacent sites, and yet the latest, rather rushed draft Transport Strategies (October 2023) have specifically left these assessments to individual site developers. This is simply **not an objectively assessed approach to assessing the infrastructure requirements** of such a significant number of dwellings.

1.10. To treat these allocations separately is a major error on the part of the County Highway Authority. A cynical person may state that it is a convenient short cut approach to get around this highly sensitive issue in order to expediate the progression of the Local Plan.

Policy DS3: Housing Allocations	<p>In respect of the main policy, the same comments apply as per the CHA's comments on Policy DS1.</p> <p>In respect of the policies relating to the specific sites, the CHA notes that they vary in structure and content and contain varying levels of (relative) detail. Whilst the CHA is not expressing a view as to whether this is 'right' or 'wrong', in particular, the policies in some cases seek to deal with the cumulative impacts of growth on educational infrastructure. The CHA would be concerned if this disparity were to create a misleading impression about the need also to secure developer contributions towards addressing any cumulative transport impacts across the Borough (including infrastructure and enhancements to passenger transport and walking and cycling provision). The CHA would ask that changes be made to the Plan to avoid such an impression. (This comment should also be read in particular with the CHA's comments on Place Based Policies and CC5 and INF1 and 2.)</p> <p>Furthermore, Policy DS3 could be helpfully strengthened to ensure a comprehensively master-planned (and thereby coordinated) approach is taken to key clusters of adjacent sites. In particular this applies to:</p> <ul style="list-style-type: none"> o Sites to the south and east of Syston – HA1/HA2/HA3 and possibly also HA5, HA7 and HA8 o Sites to the south-west of Loughborough – HA16/HA17/HA19 o Sites to the east of Shepshed – HA32/HA34 and possibly also HA31 o Sites to the south of Shepshed – HA39/HA40/HA41 o Sites to the north of Queniborough – HA64/HA65
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Recommendations in respect of cumulative impact assessment re para 3.1.4

1.11 We urge the Inspectors to do what is right to demonstrate that this Plan is indeed **Sound** and **'Positively Prepared'** and that it is indeed based on a strategy which seeks to objectively assess the development and transport infrastructure requirements by:

1A. Request Leicestershire County Council to undertake a cumulative transport assessment of the key cluster of adjacent sites at HA15, HA16, HA17 and HA19 as part of the assessment of Soundness of this Plan, and identify the likely impacts and mitigations for the neighbouring estate roads which already suffer from considerable on street parking problems especially on Haddon Way, Laburnum Way and Highlands Drive and are currently not served by a bus service.

1B. To amend paragraph 3.1.4 of Exam 75 to:

*'The Strategies shall assess the more **localised impacts of a key clusters of neighbouring allocations**, as individual developers are unlikely to pick up the cumulative impacts that these cluster developments will create, since it is clear that no individual development will be able identify or deliver the necessary mitigation. This requires a coordinated approach to ensure appropriate infrastructure and other services can be funded. Managing impacts on an ad-hoc case-by-case basis through the planning process will not support sustainable development in this instance. There will continue to be a requirement for developers to assess and determine their site-specific impacts and mitigation requirements.'*

1C. To amend the SD/2 policies for HA15, 16, 17 and 19 to:

*'Cumulative transport assessments will be necessary for HA15, HA16, HA17 and HA19 **cluster of allocations** to assess the transport impacts and accompanying mitigations to reflect their spatial interdependency on the Haddon Way and Grange Park area'.*

2. Draft Transport Strategies Exam 75 and public transport para 4.4

2.1. Public transport infrastructure accompanying the original Grange Park development has not been delivered and due to design and internal car parking layout mistakes, the estate now suffers from major on street parking on key routes such as Haddon Way, Laburnum Way and Highlands

Drive. These are the internal estate roads that are most likely to be impacted by the key cluster of allocations proposed.

2.2. With regard to section 4.4 of Exam 75 which relates to passenger transport, particularly public buses, there is a shocking lack of public bus services requirements to the HA15, HA16, HA 17 and HA19 sites. Although a bus transport was determined to be necessary as part of the initial planning permission for the Grange Park estate, this has never been delivered, thus making it very difficult for the elderly and those with young children in particular to access public transport. Going to secondary schools often necessitates two bus journeys.

2.3. Note that SD/2 Policy CC5 requires new developments to be no more than 400 m walking distance from an existing bus stop, this policy will not be deliverable in the case of the HA16, HA17 and HA15 as there is not an existing bus service to connect into. The whole sustainability argument reason for this allocation being in close accessible reach of supporting the Loughborough town centre is a myth as rural locations further afield in Quorn and Mountsorrel are better served with public transport to reach Loughborough town centre and secondary schools than the residents from the Grange Park estate.

Recommendations in respect of public transport Exam 75 para.4.4

2.4. We note with interest that paragraph 4.4.3 of Exam 75 which states Leicestershire Bus Service Improvement Plans are now the route via which capital funding is awarded from Government for measures such as bus lanes or upgrades to bus stops and shelters. Revenue funding can also be secured to support bus services that do not operate on a commercial basis (i.e., are not quite profitable enough for operators to run, but still provide value for money in the transport offer for high priority journeys they provide to communities, and therefore warrant subsidy support under the Council's Passenger Transport Policy and Strategy (PTSP).

2A. We refer to the above and question why this funding opportunity have not been accessed or implemented in Grange Park already? We request that the Transport Strategies and Local Plan policies are amended to acknowledge the current public transport deficiencies on the Grange Park estate, and incorporate policies to ensure 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.

3. Improvements required to the Aldi / Woodthorpe Roundabout – Exam 75

3.1. There are numerous references to the "A6/A6004 corridor" in section 4.5 of the Transport Strategies Exam 75. We welcome the mitigation measures proposed to the One Ash roundabout as the A6 approached to Loughborough from the Southeast. In addition, there are proposed mitigation measures proposed to three other junctions along the A6004. However, we cannot see any improvement measures for the Aldi / Woodthorpe roundabout in the Transport Strategies.

3.2. Road safety, especially for children walking or cycling to school, is of great concern to local families. The Aldi / Woodthorpe round is highly dangerous for pedestrians and cyclists crossing to go towards Grange Park, Quorn schools, the Aldi complex, the Chimes development and Loughborough town centre, as has been demonstrated by a recent fatality at this roundabout.

Recommendations in respect of the Aldi / Woodthorpe Roundabout

3A. Exam 75 should be amended to include an assessment and mitigation measures to improve the safety of the Aldi / Woodthorpe roundabout especially as the majority of the key cluster of developments will directly impact this roundabout.

4. Sustainability Appraisal Addendum Exam 57

4.1. The revised document is very detailed but is based on a large number of “desk top assumptions” which we consider is a wholly inadequate approach to such an intrinsically important matter. Table 4.1 of Exam 57 states ‘*Not cause significant adverse environmental effects.*’ Page 39 states ‘*Minor negative effect*’. We strongly object to this conclusion as it is contradictory to the following extract from the Pre-Submission Draft Local Plan Examination Document SD/2 policy DS3 (HA16) which states:

*‘The site is located in a sensitive and valued landscape within the Charnwood Forest and forms an important part of the landscape setting of Loughborough. The site is prominent in views from the Outwoods and other higher ground to the west, and **care will be needed in planning the site to ensure that urbanising effects of development are successfully mitigated.** The provision of significant planted areas which allow trees with large canopies to mature is likely to be a more successful solution to integrating new development into the landscape. This will require careful attention not just to design and layout, **but to long term management and maintenance of public open spaces.** The site is also in a **strategically important link in the wildlife network** between the important natural resources of the Charnwood Forest and Soar Valley. For this reason, it is particularly important that biodiversity net gain is achieved **on site in this location** rather than through off site contributions, in accordance with Policy EV6. Parts of the site are **at risk from surface water flooding** and access to the western portion of the site needs to be carefully planned in light of a flood risk assessment. The site also includes a **tributary of the Wood Brook.**’*

4.2. Taking this statement from Pre-Submission Draft Local Plan Examination Document SD/2 on board (and this is only one of many such statements), the allocations at HA16 and HA17 should not be considered as being appropriate for development in the emerging Local Plan, the **Sustainability Appraisal Addendum document Exam 57 should be amended to reflect the sensitivities of this site**, which despite every policy intention will indeed destroy this highly sensitive area if it potentially becomes a construction site and will inevitably have a negative visual effect from surrounding areas in particular from the higher ground of Charnwood Forest (the Outwood) to the west of the proposed site. We strongly believe that allocation HA16 is wholly inappropriate for additional housing development, as supported by CBC planning department when a previous planning for part of HA16 (planning ref P/14/2471/2) was refused planning permission in 2015 for reasons related to *lack of good access to existing public transport systems which would help to reduce car use and failure to protect the intrinsic character and beauty of the landscape.* This has not changed. There is still no public transport and the landscape remains highly sensitive, especially viewed from the Charnwood Forest.

4.3. The diagram overleaf is taken from the latest Bloor Homes (BH) planning application submitted in October 2023 (ref P/23/1517/2) for 133 Houses on part of HA16, (submitted ahead of the Local Plan being found Sound). This shows the areas in red as areas of development and paths etc. Green is the only areas of open grass land, hedgerows and existing trees which may potentially remain. This demonstrates, that despite policies seeking mitigations, a wholly inadequate approach is

proposed to the landscaping and layout of such a highly sensitive area, with no regard to the Charnwood Forest, edge of development location, flooding and strategic wildlife corridors. It appears a mass of urbanisation with token tree planting mostly contained within private housing which can easily be felled, without the need for planning permission.



4.4. Examination Document SD/2 policy DS3 (HA16) is very clear about the need to provide for *strategic wildlife corridors and significant new tree planting with large canopies within public spaces, taking care to avoid the urbanising effects of the development on this highly sensitive Charnwood Forest location.* We consider that the Viability Assessment addendum (Exam 76) has also failed to take account of the special policy requirements by not looking to reduce density and developable land assumptions due to the need to increase planted and blue spaces and safeguard wildlife corridors required to address the sensitivities of this site, a point we return to below. Far too many houses are being squeezed onto this site without regard the requirements of Policy DS3 (HA16).

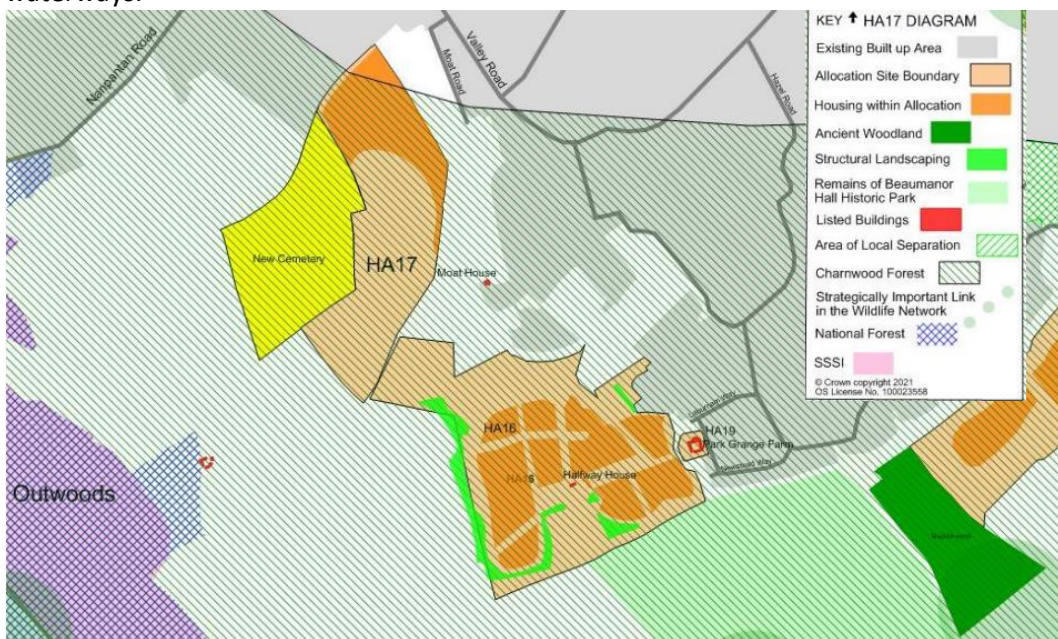
4.5. The mass of development should be reduced, releasing at least 40% of the site for green and blue infrastructure. The current BH scheme on part of HA16 incorporates small and medium in size trees (3m to just over 4 m), largely within private gardens which is wholly inadequate as these can easily be felled, without the need for planning permission. This demonstrates the need for stronger policy wording to reflect what is required. The large canopy tree planting that is required must be contained within wide public open space corridors which can also serve as important wildlife and ecology corridors as well as “opening views of the Forest” from the current road access points and providing better options for creating blue infrastructure for longer swales instead of the proposed concrete tanks. The marked-up plan overleaf of HA16 depicts how we consider the scheme should be revised to incorporate longer public linear spaces as highlighted over the BH tree survey plan.



Plan extracted from Bloor Homes tree survey with overlay of suggested linear routes for wildlife and public Green Infrastructure routes

4.6. We refer to the dreadful flooding issues which have occurred in the Bramcote Road, Beck Crescent and Moat House development areas in 2019 which was a result of over development and poor flood mitigation measures and maintenance regimes. The allocation at HA17 Moat Road extension is directly adjacent to HA16, and indeed in the diagram below from Examination Document SD/2, shows these two allocations as **being connected**, resulting in some 630 dwellings in total and possibly more due to lack of agreement on the housing totals for HA16.

4.7. In relation to HA16 we refer the Inspectors to a response from the Trent Water Trust (TWT) letter dated 27 September 2023, Appendix C attached, which very succinctly highlights a number of requirements for blue infrastructure design necessary to avoid these catastrophic flooding caused referred to above directly as a result of development not taking account of its impact on minor waterways.



Extract from SD/2 page 47 showing the connection between HA16 and HA17

Recommendations in respect of Exam 57 – green and blue infrastructure

4A. We are of the strong view that to be acceptable with Exam 57, Policy DS3 (HA16) of Exam SD/2 should be amended to include **‘at least 40% of this sensitive allocation should be safeguarded and allocated for green and blue linear infrastructure corridors contained within the public spaces’** incorporating new large canopy tree planting, wildlife corridors and naturally created flood mitigation measures with clear strong maintenance regimes built in from the outset.

4B. We also urge the Inspectors to take on board the contents of TWTs letter and seek to strengthen the policy wording for the HA16 and HA17 allocations to avoid the sort of flood mitigation measures that are currently being proposed by Bloor Homes. It is true that to incorporate sustainable flood mitigation measures there will be a need for further land take, thus reducing the overall developable area which should be reflected in the latest Viability Assessment addendum (Exam 76).

5. Updated Charnwood Local Plan Viability Consolidated Addendum Report Exam 76

5.1. We note that standard greenfield site appraisals that have been undertaken to demonstrate ability of development to support the funding of the additional transport and education infrastructure and affordable housing. We also note that these additional requirements should now be included in the relevant policies for HA16, 15, and 17.

5.2 We strongly believe that 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”, as set out in Section 4 above. To achieve this, they will require a considerable amount of sensitive planting and green / blue infrastructure and strategic wildlife corridors to be created.

5.3 As such the viability assumptions, in relation to the total number of dwellings developable, after taking account of the need to allow for at least 40% of the land for green / blue infrastructure is likely to affect the viability input assumptions and viability outputs. Also, by creating the type of development set out in the policy, the density assumptions will need to be reduced to reflect the edge of development location with views to the highly sensitive and important Charnwood Forest.

5.4 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 can only be factored into the viability assessment once Leicestershire County Council has undertaken this critical assessment as part of the Transport Strategy, (which it appears the LCC has ran out of time to do so due to a change in direction of policy / allocations).

Recommendations in respect of Exam 76 – viability assumptions inputs

5A. We would ask the Inspectors to be mindful of the need for amending the viability assumption inputs as set out in Section 5 above to help achieve the type of development that is set out in Policy HA16 and HA17.

We hope the Inspectors will find our comments and recommendations constructive and look forward to further positive correspondence in the near future.

Please acknowledge receipt of this document.

Yours Faithfully,



Nigel Trasler – Chair
On behalf of Haddon Way Residents Association.

Attached Documents

Appendix A

HWRA Residents Association letter dated 22 August 2021, reference comments on the Charnwood Local Plan 2021-37 draft document dated July 2021.

Appendix B

Leicestershire County Council Cabinet Joint Report of the Chief Executive and the Director of Environment and Transport dated 23rd June 2023, Agenda Item 9 on page 103

Appendix C

Trent River Trust letter dated 27 September 2023



HWRA Residents Association



22nd August 2021

Dear Sirs

HWRA is the local Residents Association which represents the Haddon Way and Grange Park communities in Loughborough South. We would like to make the following **comments on the Charnwood Local Plan 2021-37 draft document dated July 2021.**

Our concerns will be addressed specifically to the areas which are nearest to and directly affect our local area, namely areas referred to as HA15, 16 and 17.

- HA15 Land to the south of Loughborough between Grange Park, Quorn and the hamlet of Woodthorpe, **723 houses proposed and one school**
- HA16 land off Laburnum Way, **422 houses proposed no additional infrastructure facilities identified**
- HA17 Moat Farm, **land southwest of Grange Park, 205 houses proposed no additional infrastructure facilities identified**

The existing Grange Park/Haddon Way estate consists of some 2000 houses, which is largely devoid of infrastructure needed to build a sustainable community. The original plan for this area included a local centre on Grange Park, and was granted planning permission via application P/09/0233/2. This centre was meant to contain shops, Doctors surgery, place of Worship and a Community Centre.

A community led fundraising initiative saw the new community centre delivered in December 2019 on Grange Park (the Arc Community Hub.) This was a community led project funded by the National Lottery. Whilst we believe this can provide the required community buildings for these 3 developments unfortunately the other elements of the local centre, previously identified by Charnwood Borough Council as essential to the development, were replaced with additional housing as per the terms of the S106 Agreement.

Clause 6.10 states that “Community facilities are essential to and maintain a high quality of life” Policy T2 states within 800 m of your home. Apart from an additional school, there is no additional infrastructure or facilities within the local plan for Loughborough South. This leaves a glaring gap in provision for the residents of the existing estates, and the residents of these future developments.

We strongly believe that the Local Plan is not sound because it is:

- Not Positively Prepared
- Unjustified
- Ineffective
- Inconsistent with Policies



Not Positively Prepared

We would like to register our concerns with the public consultation period of 6 weeks ending on 23 August 2021, as this period directly coincides with the local school holidays. We believe this timing is very poor and directly disadvantages many local people from making their voices heard. The webinars hosted by Charnwood Borough Council (CBC) were very useful, and we hope that they will be a feature of consultations going forward. Residents have reported that they found the online form confusing, and that they felt they didn't have enough knowledge of planning policies to be able to reply.

During the initial consultation period, CBC have gone to great lengths to try and demonstrate that they have allocated new housing to the most appropriate areas of the borough. However, there are glaring differences between the Draft Local Plan which was being consulted on in December 2019 and this document. In December 2019 HA15/16/17 were considered inappropriate for large scale developments but now have been added as the major development zones. A number of key factors have also been ignored like local separation, the detrimental effect to the hamlet of Woodthorpe, the provision of facilities like a doctor's surgery and local school facilities.

Page 73 Clause 2.140 refers to independent design reviews at sensitive locations. However, they only refer to HA16 and HA17 as protecting Charnwood Forrest and not the historic Hamlet of Woodthorpe. We believe this is an omission.

Proposal to improve soundness of the Local Plan: *More weight should be given to resident's opinions, versus the opinions of potential developers. It is very demotivating for comments from the first round to have been largely disregarded. Protecting the hamlet of Woodthorpe has been omitted in page 73 clause 2.140.*

Unjustified

Whilst HWRA appreciate the need for additional housing both locally and nationally, we do not believe that CBC have made the correct choices for the allocation of new housing in this instance. Page 23 shows the general allocation of new houses and page 34 states of the 2242 new houses allocated in the Loughborough area 1350 (over 60 % of new houses) are allocated to the three areas HA15/16/17. We believe this to be an unreasonable distribution of new houses and will have a severe negative impact on the infrastructure, facilities, causing an increase in traffic congestion to our local community. With only a new primary school being deemed sufficient to be needed with these additional communities.

Proposal to improve soundness of the Local Plan: *Look at the area as a whole when assessing infrastructure needs. Haddon Way estate was built on the promise of infrastructure to be built on Grange Park estate. With Haddon Way estate (875 houses), Grange Park estate (790), and HA15/16/17 (1,350 proposed houses) the total area is 3,000+ houses which is a similar size to the Garendon estate but without the community infrastructure. Additional infrastructure and services should be added to the Local Plan for Loughborough South and delivered by developers.*



Ineffective

We strongly believe that development should be infrastructure led so that roads, schools, health centres, etc. are all built prior to housing being constructed and occupied. It is not reasonable for new homeowners to purchase their properties with just the promise of adequate facilities; these should be in place prior to any construction commencing.

Clause 9.1 states that infrastructure is also an important part of delivering sustainable development. This should include green open spaces and recreation facilities, community infrastructure, schools, health centres and community buildings.

Page 196 Clause 8.77, Policy EV9 and table 11, indicates the type of open space and recreation provisions which should be provided. It states developments greater than 250 units, or 600 persons will require provision of all types of open space, indoor and outdoor sports facility, and recreation provision in accordance with CBC standards and with a presumption for onsite provision in accordance with our policy i.e., facilities local to the development. However local indoor sports facilities provision are not mentioned within the plan for areas HA15/16.

Appendix 2 is a recent email from Local County Councillor Ted Parton giving an overview of the current school situation in Loughborough South is summarised below:

Secondary school place availability:

- a) *Woodbrook Vale school cannot expand, due to Sport England funding not wishing the fields to be taken away.*
- b) *The private schools have vacancies, however at £5000 per term this is prohibitive for a great many families.*
- c) *Rawlins College in Quorn is at full capacity and cannot expand, due to be sited on a flood plain.*
- d) *Charnwood College does have capacity, however is situated at the north west of Loughborough the opposite end of town to Grange Park and with poor Ofsted rating*
- e) *Next nearest secondary schools with capacity are in Shepshed and Syston, which are not reachable via walking or bicycle.*

Primary school place availability:

- a) *Mountfields is full*
- b) *Holywell is full*
- c) *Outwoods Edge is full*
- d) *St Bartholomews is full*
- e) *The Beacon Academy does have places, however, again suffers from poor Ofsted ratings.*

As stated above, there is a grave deficiency in school places. With local schools in reasonable accessible distance of the three developments already oversubscribed, new homeowners will be faced with the prospect of sending their children to schools which are some 10 to 20 miles away from their homes, requiring use of cars, causing additional traffic movements.

Although we note that development HA15 indicates a new primary school, Clause 9.6 believes that secondary and early learning places are available locally. The summary above



demonstrates this is not the case and that a new Secondary School will also be required for the Local Plan to be effective.

If developments were infrastructure led schools could be built prior to any houses being occupied. This approach will ensure children go to their local school and ensure good community coherence is maintained. CBC have clearly stated it is very important to have local schools supporting local communities. This current plan does not support this statement.

Clauses 8.8 and 8.9 deal with the provision of healthcare i.e. Doctors surgery. Through our own experiences on Grange Park estate, land for the provision of a medical centre was set aside within the S106 agreements, but no provision for the building itself. Residents purchased their homes in good faith that facilities would follow, but this never happened, and the land was ultimately used for additional housing. It is clear that medical service providers are not incentivised or equipped to build their own surgeries but would occupy a pre-built building. Again, we emphasise that the development should be infrastructure led and that healthcare such as Doctor's surgery facilities should be made available early on.

Proposal to improve soundness of the Local Plan:

- *Developments should be infrastructure led and the schools and Doctors surgery should be built prior to any houses being occupied. We believe the Local Plan should stipulate that the housing developer should provide both the land and building for a Doctors Surgery. This can then be rented to a surgery at commercial rates and again will provide a necessary infrastructure for a coherent community.*
- *A Secondary School should be added to the later timeframe of the Local Plan.*

Bus provision

Clause 7.48 covers the issue of public transport. Grange Park was designed to include a bus route however one has never been provided in the 20+ years the estate has been established. The nearest bus stop is on Spindle Road or Poplar Road – a significant distance for residents to walk, over a 1000m walk for most residents. The Local Plan indicates that sustainability, and therefore bus provision, is at the heart of future development but nowhere does this plan say how this will be achieved.

As some 30% of the proposed houses will be “Affordable houses”, there is a high chance that these households may not have the use of cars and will greatly benefit from local bus routes. The local bus service provider Kinchbus informed MP Jane Hunt in April 2021, at our request, that a bus route for Grange Park estate is commercially unviable (*See Appendix 1*). So, although CBC promote the use of buses and indeed plan developments to include them, they have no influence over the provision of these by commercial operators. Our experienced with Grange Park shows that despite good planning, no bus route will be provided in the near future, so in effect CBC Policy CC5 is undeliverable. The provision of travel packs to new residents without bus routes will not change transport behaviours and has essentially been a pointless exercise on Grange Park.

We believe that the housing developer should not be asked to contribute to but should fully subsidise a regular bus service to Grange Park estate and the new proposed developments.



Access

We have witnessed street parking on Grange Park as a serious problem to local residents and passing traffic. The access to the proposed development HA16 is via Laburnum

Way and Newstead Way. Both these roads are 6.6 m and 5.4 m wide respectively, and were not initially designed as main access routes, or ones that could take a bus route. In addition, there is excessive street parking in these areas which limits the access along these roads. We believe these factors will be a major negative issue during the construction phase, for residents both of the existing and new development when the new estate is occupied. We do not believe that CBC have assessed the access to these zones carefully enough.

The access to proposed development HA15 is currently proposed from Main Street in the hamlet of Woodthorpe. In this case the road is 3.3 m wide and only designed as access for limited residents and farm traffic, it is not suitable for the proposed 700 new houses.

The A6004 ring road roundabout at the junction of Terry Yardley Way, Allendale Rd Carnation Road and Ling Road, has been a source of grave concern to local residents following the addition of two housing developments and one commercial site surrounding this roundabout. The proposal to use the 3.3 m wide Main Street, which goes into the hamlet of Woodthorpe as an access to HA 15 development is totally impractical. This will add a fifth major junction to an already problematic roundabout.

It is the view of local Councillors and residents that it will be necessary to consider an additional separate access from Terry Yardley Way. Policy INF1 supports this.

Car Parking

As a Residents Association we are constantly being contacted by residents regarding the dangers caused by inconsiderate on street parking. The development generally caters for off street parking for 1 or 2 vehicles plus a garage per property. However, these are often designed for cars to be parked one behind the other. This is not practical for separate car access and thus poor street parking is inevitable. Due to the narrowness of the estate roads street parking often consists of one wheel on the pavement causing issues for passing wheelchair and push chair users.

The Local Plan goes as far as to comment on the space between car parking spaces, but it does not recommend independently operated off road car spaces!

Proposal to improve soundness of the Local Plan: –

- *The housing developer should fully subsidise a regular bus service to Grange Park estate and the new proposed developments.*
- *A separate road access from Terry Yardley Way into the HA15 development including traffic light control should be mandated, to ensure safe use of the surrounding roads and protect the hamlet of Woodthorpe.*
- *Adequate parking provision should be defined through “Policy T3 Car Parking”, with enforcement of side by side independently operated parking spaces, to ensure that future developments learn from the issues on Grange Park estate.*



Inconsistent with policies

The Local Plan document states the following

- Item 5.21, “We want to encourage people to live close to the urban centres in the Borough to promote the future success of those centres by boosting footfall and the local economy” i.e. not housing development on the south of the borough.
- Item 5.36, CBC state they want to protect the character and appearance of the countryside and our rural communities.

However, these developments will have a huge negative impact on both the local countryside and the community of Grange Park and the hamlet of Woodthorpe.

Green Wedges Policy and Local Separation

Clause 8.11 states green wedges are essential to identify areas of local separation.

- Green wedge and areas of local separation are mentioned numerous times within the document -Policy DS1 and SC1. Page 42 shows proposed development HA15 around the hamlet of Woodthorpe and to the south of Grange Park which has left little green wedge to separate the new development from the existing houses. Thus, the hamlet, which is mentioned in the Doomsday book, will lose its unique hamlet identity and will irrevocably destroy the unique character of the hamlet of Woodthorpe forever, being consumed into a new housing development. Woodthorpe was previously identified as having an area of local separation from the Grange Park estate this is shown on the map on page 42. It is essential that the hamlet of Woodthorpe is protected to keep its own identity. Therefore, the plan shows HA15 as not complying with Policy EV3.
- CBC have stated that the plan specifically avoids any significant growth in small villages or hamlets however this is clearly not the case with the proposed development HA15.

Climate Change

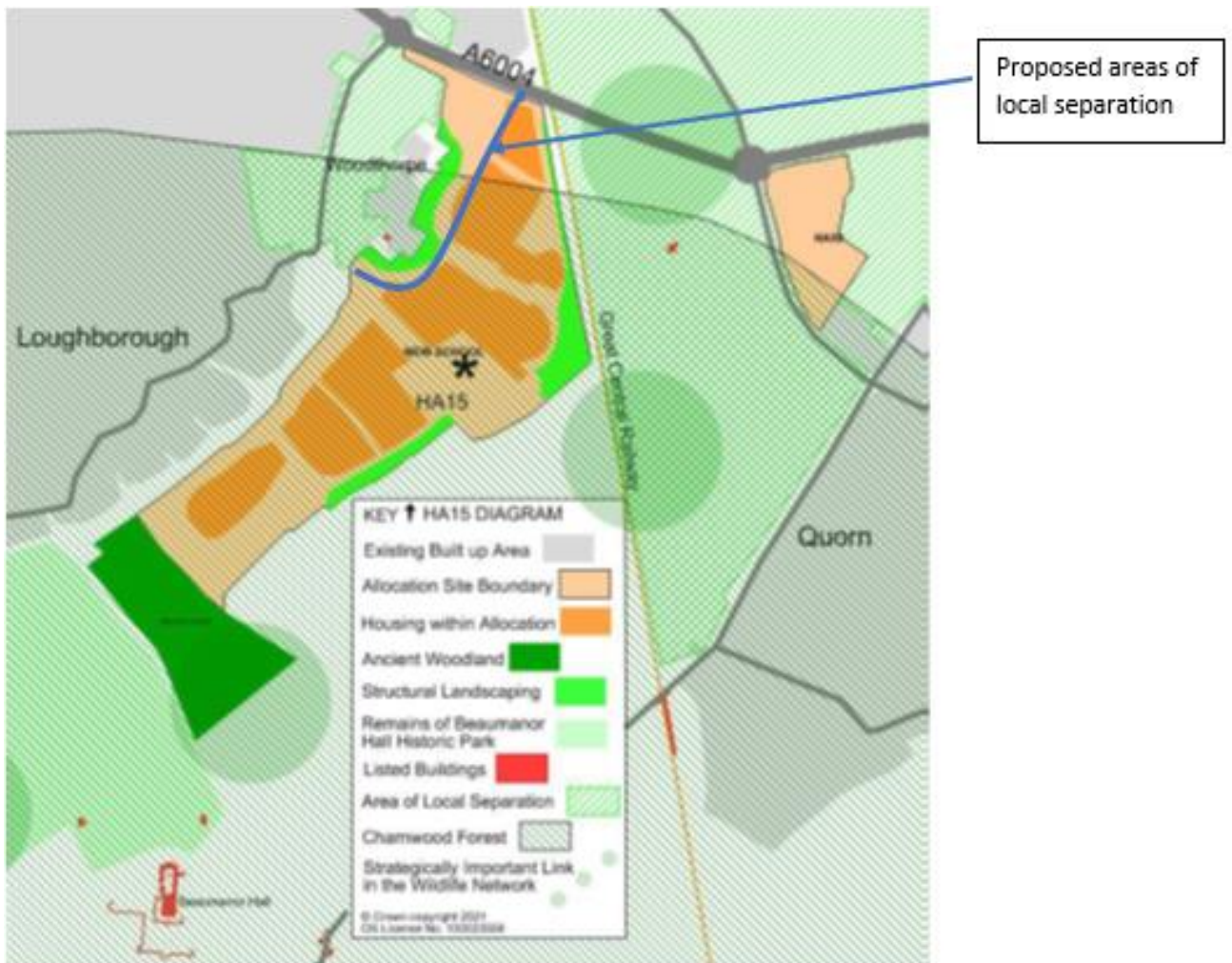
Chapter 7 discusses the issue of climate change and how to improve the local environment. Clause 7.8 describes the pledge to plant 100,000 trees by the end of 2024. If developments are allowed to go ahead then these should be provided and planted by the housing developer as part of the early landscaping process.

We believe clause 8.54 is misworded and should clearly state that the residential developer is to make significant contribution to tree planting, which we would welcome.

Clause 7.27 and 7.41, talk about Renewable Energy. There are a number of products which can be included in the build of these proposed new homes. The developer should be made to include these energy saving products as part of the build process, thus saving both CBC and the house purchaser money. These products can include wind turbines, solar energy panels and ground source heating which can easily be added to the proposed developments at the early build stage.

Proposal to improve soundness of the Local Plan:

- *The area of local separation for the hamlet of Woodthorpe should be considerably increased as per diagram below.*
- *Remove housing and access proposal for site HA15 from Main Street and provide a 'local area of separation' to adequately protect Woodthorpe. See proposal below.*
- *Policy CC-4 should use the word compelled, not encourage. These new high standards of energy efficiency should be part of the standard construction of these proposed new homes.*
- *The developer should provide the 100,000 trees pledged by CBC.*
- *The developer should be made to include energy saving products as part of the build process.*





How can the Local Plan be made sound?

As already detailed, we have a number of concerns about the Local Plan, and we are disappointed that opinions expressed in the initial consultation were disregarded. We urge CBC to learn from the mistakes made on Grange Park estate, and take on board the following proposals to make the Local Plan sound.

- Developments should be infrastructure led with schools and Doctors surgery being built prior to any houses being occupied. *To ensure the plan is properly prepared and not ineffective.*
- CBC should look at the area as a whole when assessing infrastructure needs not a site by site basis. Loughborough South estates will grow to a total of 3,000 plus houses. Additional infrastructure and services should be added to the Local Plan and delivery by developers enforced. *To ensure the plan is properly prepared and not ineffective.*
- Stipulate that the housing developer should provide both the land and building for a Doctors Surgery. *To ensure developments deliver as proposed and isn't ineffective.*
- A Secondary School should be added. *As provision is not positively prepared.*
- The housing developer should fully subsidise a regular bus service to Grange Park estate and the new proposed developments. *To ensure they really are sustainable, not ineffective and the plan is positively prepared.*
- Developers must provide adequate parking provision and independently operated parking spaces for all new houses, to ensure that future developments learn from the issues on Grange Park estate. *To ensure the plan is effective, sustainable and positively prepared.*
- Increase the 'local separation' to adequately protect Woodthorpe (see Diagram on Page 7), and force access to future developments from a road access into HA15 from Terry Yardley Way including traffic light control to ensure safe use of the surrounding roads. *So the plan is positively prepared and no longer inconsistent with policies.*
- Protecting the hamlet of Woodthorpe has been omitted in page 73 clause 2.140 and *therefore is inconsistent with policies.*
- Policy CC-4 should compel, not encourage that these new high standards of energy efficiency should be part of the standard construction of these proposed new homes. *In order to ensure the plan is positively prepared.*


Please consider implementing these essential points into the new Charnwood Local plan 2021-37 draft document dated July 2021 to ensure it is fit for purpose and for the future strategic growth of Charnwood to be successful.

Regards
Bob Newnham
Chair HWRA Residents Association



Appendix 1:

Email to HWRA from MP Jane Hunt's office detailing the response received from Kinchbus via Leicestershire County Council.

 **POLAND, James** <james.poland@parliament.uk>
to jonathan.morgan@leics.gov.uk, Parton, Joanne ▾

Fri, 30 Apr, 11:11 ☆ ↶ ⋮

Hi Jo,

We've now received a reply from Leicestershire County Council regarding this matter:

'I refer to your email of 24 March 2021, enquiring about the establishment of a bus service for Haddon Way/Grange Park development, on behalf of the Haddon Way Resident's Association.

As there is no developer funding available through the planning process to support a bus service, it would require a commercial bus operator to take this on.

Kinchbus are the primary bus operator in Loughborough running several town services, including service 5. This operates around Laurel Road and Fairmeadows Way, which crosses the top of Haddon Way. An approach was made to them on the question of diverting service 5 to serve Grange Park. They advised that there is no slack in the current timetable to extend the service without adding an extra vehicle on to the cycle, which would involve additional costs.

They did also look at the possibility of a new link between the town centre and Grange Park however, they again felt this would be too much of a commercial risk to take at this present time with bus usage significantly reduced and great uncertainty on whether passenger levels will return to normal. They did indicate however, that they would be open to reviewing this at a future point should the operating environment alter significantly.'

I'm sorry I couldn't get a more positive reply on this occasion.

Kind Regards,

James



James Poland

Caseworker for **Jane Hunt** MP

Member of Parliament for Loughborough, Shepshed, Quorn, Barrow, Sileby, Hathern, Mountsorrel Castle and the Wolds villages





Appendix 2:

Email from Ted Parton, County Councillor, to HWRA Committee Member

School Place Information

Mr. T. Parton <Ted.Parton@leics.gov.uk>
To: <nigel.braier@integraltd.co.uk>

Reply Reply All Forward ...
Fri 20/08/2021 09:37

Good Morning Nigel,

Thank you for your request for school place information.

Please would you kindly accept apologies for the delay in sending the desired information.

To summarise:

1. Since academies have their own autonomy over catchment areas, the local education authority cannot force the schools to take local children.
2. Whilst housing developments do have to legally provide funding for school places -including new schools in some situations, these are built after the developments are started. A good example is the Grange Park Estate, where housing began and then the schools gradually were expanded.
3. Currently, if the large Woodthorpe development were to be passed (which is now highly unlikely), the secondary school places would have been placed into deficit.
4. As the current situation stands as of today (and going into the new academic year), the scenario is:
 - I. Woodbrook Vale school cannot expand, due to Sport England funding not wishing the fields to be taken away.
 - II. The schools foundation have vacancies, however at £5000 per term this is prohibitive for a great many families.
 - III. Rawlins is at full capacity (Quorn) and cannot expand, due to be sited on a flood plane.
 - IV. Charnwood College does have capacity, however is situated at the opposite (North-West) end of the town and has a consistently poor ofsted record.
 - V. The nearest secondary schools with capacity (after the aforementioned) are in Shepshed and Syston, which are not reachable via walking or bicycle.

In terms of primary schools:

- 1) Mountfields is full
- 2) Holywell full
- 3) Outwoods Edge full
- 4) St Bartholomews full
- 5) The Beacon Academy does have places, however again suffers from poor ofsted ratings.

Please would you find attached some information from a schools manager regarding a capital plan for school places. This covers all of Leicestershire though.

Dear

Further to Mr Parton's response, I can offer you a little more detail in order to provide you with some context to the article having spoken to my colleague Sue Owen who leads on School Place planning.

The article refers to the County Council's 'capital programme', which includes funding for delivery of additional school places across Leicestershire. Plans are to provide an additional 1,889 mainstream school places for Leicestershire broken down by 1,134 primary school places and 755 secondary school



places. The programme will stretch over a period of two years, 2021 to 2023 to see through the delivery of places.

The funding is targeted at areas where there is forecast to be demographic growth and a lack of places in the area. If there are sufficient places in an area, (all be it not always at the most popular schools) we are unable to access or allocate funding to provide additional places.

Thank you very much, Nigel.

Yours Sincerely,

Ted Parton

Leicestershire County Councillor for the Loughborough South Division

Cabinet Support Member for Adults and Communities Department

Leicestershire County Council's Mental Health Champion

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CABINET – 23 JUNE 2023

CHARWOOD BOROUGH COUNCIL'S LOCAL PLAN

**JOINT REPORT OF THE CHIEF EXECUTIVE AND THE DIRECTOR
OF ENVIRONMENT AND TRANSPORT**

PART A

Purpose of the Report

1. The purpose of this report is to advise the Cabinet of the potential risks to the progress of Charnwood Borough Council's Local Plan, and the County Council's progress towards securing developer contributions and managing development in respect of highways needs in the Borough following a change of administration at Charnwood Borough Council. A new administration has been formed following the May 2023 elections and the Borough Council is yet to publicly confirm its support for the submitted version of the Plan and its commitment to its delivery.

PART B

Background

18. In September 2021, a Cabinet report outlined that the County Council should adopt an in-principle supportive approach to Charnwood BC's draft Plan on a conditional basis.
19. Charnwood BC submitted its Local Plan for Examination in December 2021.
20. A further report was taken to the Cabinet in June 2022, prior to the Examination in Public (EiP), noting that key highways and transport conditions set out in the September 2021 report had been fulfilled, whilst noting that it would be necessary to accept a proportionate and reasonable deterioration in traffic conditions as a result of developments being permitted prior to the overall mitigation package being put in place.
21. In June 2022, prior to the EiP, the Cabinet was advised that the key highways and transport conditions detailed in the September 2021 report had been fulfilled, although it would be necessary to accept a proportionate and reasonable deterioration in traffic conditions as a result of developments being permitted prior to the overall mitigation package being put in place.
22. Following the first week of the EiP Hearing in June 2022, weeks two and three were adjourned to allow for consultation on Leicester and Leicestershire's Housing and Employment Land Needs, and on the evidence underpinning the Leicester and Leicestershire Statement of Common Ground, with this matter then being covered at the Hearing sessions on 25 and 26 October 2022. As a result of those sessions, the Inspector has agreed a minimum local housing requirement for Charnwood of 1,189 dwellings per annum to 2036 (as agreed in the Statement of Common Ground). This is an increase from the 1,111 dwellings per annum which was included in Charnwood's submitted Plan.
23. Further Hearing sessions took place during February 2023 and covered remaining Matters, Issues and Questions that were not dealt with at the June or October sessions, together with some supplementary questions. The County Council produced written statements which were submitted to the Charnwood Local Plan Examination, referring to the draft Interim Transport Contributions Strategy as a means to deal with the situation in advance of the Plan being adopted.

Interim Transport Contributions Strategy for Developments in Charnwood

24. The Interim Transport Contributions Strategy for Developments in Charnwood District (approved by the Cabinet in February 2023) was produced with support from Charnwood BC, National Highways and Leicester City Council. Following implementation it is designed to be in place until at least Charnwood's adoption of its Local Plan and until superseded by the more detailed transport strategies set out through the proposed main modifications to the Local Plan put forward

by Charnwood BC (with the agreement of Leicestershire County Council, Leicester City Council and National Highways).

25. The Strategy was prepared in response to ongoing development pressures across Charnwood with the purpose of providing an evidence base for how the Borough Council can seek necessary transport contributions through the development management process towards the Local Plan mitigation package in advance of an adopted plan and/or associated detailed area transport strategies to be developed in support of this, including setting out the broad approach to implementation of the Strategy. This has become necessary because a number of developments identified within the Local Plan are also coming through the planning process ahead its adoption.

Charnwood Transport Contributions Mechanism and next steps for the Charnwood Local Plan Examination

26. Subsequent to the approval of the Interim Transport Contributions Strategy on 10 February 2023, and pursuant to resolution 'b' in the Cabinet report regarding refinements to made for in light of ongoing discussions with Charnwood BC and its implementation through the development management process, officers have been working to implement the strategy whilst managing associated risks. A draft formula for securing infrastructure contributions was shared informally and in confidence with Charnwood BC in April 2023. However to date the Interim Contributions Strategy has not been implemented.
27. On 23 May 2023, a letter from the Inspector to Charnwood BC was published, outlining the next steps for the Examination process. It indicated a need for updates in relation to transport and viability matters and a period of consultation on the outcome of that work, and on a limited number of other matters in advance of a formal consultation on main modifications to the Plan. The letter specifically highlights that the Transport Strategies are not sufficiently detailed or developed to meet the Plan's objective to increase use of the sustainable modes of travel, nor to securing effective mitigation for the effects of the Plan's growth on the Local and Strategic Road Network. The Inspector is therefore seeking the identification and submission of a framework for Transport Strategies for Loughborough Urban Centre, Shepshed Urban Area, North of Leicester, and Soar Valley.
28. It is the position of the County Highway Authority that given the proposed approach to the distribution of development set out within the proposed Local Plan and the number of developments that have already received planning permission that the plan requires modification, as previously submitted to the examination, and that the transport strategies are necessary to support sustainable growth in Charnwood. This position remains unchanged subject to the continued commitment of Charnwood BC.

See para's 27 and 28

Potential consequences for the County Council arising from the delay in agreement of the mechanism / implementation of the Strategy

29. Charnwood BC's current Local Plan is now nearly seven years old, and the Borough Council is also unable to demonstrate a five-year supply of housing land. Under the National Planning Policy Framework (NPPF) a local planning authority in such a situation is in a relatively poor position to seek to resist speculative, unplanned sites coming forward through the planning process. Unplanned development can lead cumulative impacts on infrastructure such as roads and schools that have not been mitigated, in turn impacting on existing residents and communities. The County Council has therefore sought to support Charnwood BC in developing, adopting and implementing a new local plan to help manage this risk.
30. However, in-lieu of a firm commitment from Charnwood BC that it will support the Local Plan approach and the implementation of the Transport Contributions Strategy and its delivery, the County Council will need to reassess its position to support the Local Plan given the financial risk and lack of mechanism to mitigate against the negative impacts of development.

Appendix

**Charnwood Borough Council Pre-Submission Charnwood Local Plan (2021-37) Consultation
Leicestershire County Council Officer Comments**

Section	Comments
<i>Overall Document</i>	<p>The County Highway Authority (CHA) has worked closely with Charnwood Borough Council (CBC) to support and enable the successful delivery of growth in the Borough, including to secure the successful adoption of the current Core Strategy and to secure the delivery of transport infrastructure to enable the growth proposals that it contains.</p> <p>Thus, the CHA recognises the importance of continuing to deliver growth in a 'planned' manner (as opposed to 'unplanned', ad-hoc and speculative), and therefore wishes to see the new Local Plan successfully adopted.</p>

Development Strategy	
<i>General Comment</i>	<p>The chapter text should be stronger in setting out how evidence has played a part in driving decisions to arrive at the proposed development strategy; for example, early transport evidence was a determinate in arriving at the overall scale of housing growth that the Plan would set out.</p> <p>This is suggested because it would further add context in respect of the transport challenges faced in continuing to accommodate further growth to the north and west of Leicester and in Loughborough/Shepshed.</p> <p>In that context, whilst locating development in 'sustainable' locations and seeking to maximise levels of walking, cycling and passenger transport usage are certainly keys to accommodating/mitigating the impacts of the growth, the Plan text currently underplays the evidence-based situation in respect of the likely overall scale of the transport package necessary to enable growth going forward in the Borough of Charnwood, especially in respect of the Strategic Road Network.</p>

	<p>It is suggested that amplifying matters early in the Plan should be helpful in establishing the narrative (which should run as a core through the document) for the transport partnership-working journey that we (the Plan making authority and the local and strategic highway authorities) have been on; are still on; and that will continue well-beyond the Local Plan's adoption, reinforcing that we have a coherent and realistic approach to dealing with the substantial transport challenges faced with accommodating growth in the Borough (and elsewhere in adjoining areas).</p> <p>Reference to the SGP in the first complete paragraph gives a 'peg' in respect of our comment on page 13, but it does not really provide the early context setter than it is suggested should be provided in the Plan.</p>
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As a result of the proposed pattern of development, the transport evidence shows a wide pattern of impacts across the Borough, impacts often leading to the use of less appropriate, lower order roads with potential implications for road safety and/or the communities living along those roads.

In some cases, these impacts are likely to be the result of existing network issues and in some cases the result of cumulative impacts of different sites. Whilst the CHA accepts that addressing such issues would be beyond what it would be reasonable (in planning terms) and/or affordable (in viability terms) for an individual site, nevertheless the causes of the impacts and who should pay for them to be resolved are likely to be of little concern to those affected; they will simply look to the relevant highway

authority to deal with the impacts. This simply adds further weight for the need for a continued, cohesive, structured, strategy-led approach to the development of and securing the funding to deliver the package of highways and transport measures that will be required to support and enable growth across the Borough and ensuring that the Plan as adopted is properly reflective of this and provides as strong as possible policy platform for seeking funding.

<p>Policy DS3: Housing Allocations</p>	<p>In respect of the main policy, the same comments apply as per the CHA’s comments on Policy DS1.</p> <p>In respect of the policies relating to the specific sites, the CHA notes that they vary in structure and content and contain varying levels of (relative) detail. Whilst the CHA is not expressing a view as to whether this is ‘right’ or ‘wrong’, in particular, the policies in some cases seek to deal with the cumulative impacts of growth on educational infrastructure. The CHA would be concerned if this disparity were to create a misleading impression about the need also to secure developer contributions towards addressing any cumulative transport impacts across the Borough (including infrastructure and enhancements to passenger transport and walking and cycling provision). The CHA would ask that changes be made to the Plan to avoid such an impression. (This comment should also be read in particular with the CHA’s comments on Place Based Policies and CC5 and INF1 and 2.)</p> <p>Furthermore, Policy DS3 could be helpfully strengthened to ensure a comprehensively master-planned (and thereby coordinated) approach is taken to key clusters of adjacent sites. In particular this applies to:</p> <ul style="list-style-type: none"> o Sites to the south and east of Syston – HA1/HA2/HA3 and possibly also HA5, HA7 and HA8 o Sites to the south-west of Loughborough – HA16/HA17/HA19 o Sites to the east of Shepshed – HA32/HA34 and possibly also HA31 o Sites to the south of Shepshed – HA39/HA40/HA41 o Sites to the north of Queniborough – HA64/HA65 <p>Grouping the above clusters of sites together to create ‘mini SUEs’ through a requirement for collaboration/joint master-planning would allow a more coordinated approach to securing the transport infrastructure/mitigation required to support the delivery of these sites (e.g. in terms of internal spine roads and/or walking and cycling routes, public transport services, joint site access points and off-site mitigation), helping to reduce the challenges posed by the relatively ‘scattered’ spatial nature of the Local Plan (i.e. spread across relatively smaller/mid-sized sites rather than concentrated at large SUEs).</p> <p>It is noted that a significant number of housing sites have been allocated, helping to provide good positive planning and clarity at the outset of the developer contributions sought. It is also noted that a few allocated housing sites have had their site capacity reduced to enable key Green Wedge functions to be retained as part of development, e.g. Policy DS3 (HA12) Land at Gynsill Lane and Anstey Lane, Glenfield. This approach is supported.</p>
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	<p>It is noted that several of the site allocations require the submission of a masterplan for the development of the site to accompany the outline applications for the delivery of the sites. Some of the allocations are large, important sites and it is queried whether the receipt of a masterplan to accompany an outline planning application provides sufficient safeguards for the development of the site. Perhaps for some of the larger sites, these should be SPD documents which have adopted status and are consulted on so that all infrastructure providers can be sure that what they have asked for can be delivered.</p> <p>It is also noted that a number of the allocated sites will deliver new schools and it is important to ensure that the requirements noted in the policies match that required by the education team.</p> <p>Within this section there isn’t any mention of Health Impact Assessment (HIA). There could be reference made to HIA of masterplans, like those currently being worked on jointly with Blaby and NWL. Reference to this, at the very least for large settlements, would be advantageous.</p>
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Sites HA16/HA17/HA19 mentioned above – with a need to be grouped together to form a mini SUE for joint master planning.

<p>Policy LUC1: Loughborough Urban Centre</p>	<p>Reference in the policy to ensuring the timely and coordinated delivery of infrastructure and improving connectivity and accessibility by walking, cycling and public transport are welcomed. However, that the two aspects are split within this policy and across Policies INF1, INF2 and CC5 does little really to support the need for a coordinated, structured, strategy-led approach to addressing the transport impacts of growth across the Town/Borough.</p>
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Policy CC5: Sustainable Transport	<p>Sustainable Transport (Policy CC5) is as anticipated, with the inclusion of negative impacts on air quality and Policy EV11.</p> <p>There is mention that the district will work with the bus operators and the county council to ensure that bus services and sustainable travel options are viable but there is no reference to any contributions required through planning applications to make this happen.</p> <p>The general sentiments of this Policy are welcomed and supported by the CHA, but it is unclear why it refers to just 'major development'. Additionally, the policy appears to be written from the perspective of a single development considered in isolation</p>
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	<p>and what is needed to enable it. Whilst this is important, it is not apparent how this policy as currently drafted/worded would be applicable to address a cumulative transport impacts arising from growth across the Borough. The scale of cycling, walking and passenger transport investment required to affect a genuine change in travel behaviours of existing and future residents of the Borough is likely to be significant; securing appropriate developer contributions to deal with cumulative transport impacts will be important to delivering the scale of infrastructure required, and yet this policy does not appear to provide for this.</p> <p>Additionally, it is not just capially funded infrastructure that needs to be considered. Evidence shows that revenue funded educational and behavioural change programmes are essential in achieving changes in peoples' travel habits and the CHA would want to see the Local Plan provide a robust policy position for seeking developer contributions too towards such revenue funded measures.</p> <p>More widely, it is not especially clear how this policy integrates with other policies to provide a cohesive approach to delivering the package of transportation measures required to support and enable further growth across the Borough.</p> <p>It is suggested that it would be appropriate in this section to mention the governments new National Bus Strategy 'Bus Back Better' setting out its plans for ambitious and far reaching reform of bus services across England (outside of London) in the aftermath of the Covid-19 pandemic.</p> <p>P.166 - Suggested additions highlighted – <i>"We will expect major developments in the Borough to make provision for improving and extending our walking and cycle networks and ensuring priority is given first to pedestrians and cycle movements. We will also explore opportunities for improved signage, safe well-lit routes, <u>resting equipment and</u> increased connectivity between urban and rural areas <u>and key services</u>. We will promote the health benefits of walking and cycling for healthier lifestyles and improved well-being. More people walking and cycling will also mean less congestion and emissions on our roads, improving air quality for our local communities."</i></p>
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Infrastructure and Delivery	
<i>General comment</i>	<p>The CHA welcomes the transport evidence work undertaken to date by CBC. The evidence has served to highlight the challenges presented – both on the local transport system and the Strategic Road Network – in seeking to accommodate yet further growth in the Borough, not least cumulative impacts.</p> <p>It is the CHA's view that a coordinated, strategy-led approach is required to address the challenges – not least in respect of securing funding to deliver the package of transport measures required to support/enable growth. However, the wording of the introductory text ("<i>...This strategy has been based on an assessment of the infrastructure needs of individual site allocations [CHA</i></p>

	<p><i>highlighting] to ensure that development is sustainable...")</i> does nothing really to support the need for a coordinated approach.</p> <p>The CHA notes that "<i>...new development cannot be used to fund an existing shortfall in infrastructure; it can only be required to address the needs arising from new development itself...</i>". However, the transport evidence work undertaken to support the Local Plan's development suggests that existing problems both on the local transport system and Strategic Road Network are likely to be a barrier to the 'acceptable' delivery of further growth in the Borough, unless a route(s) (i.e. alternate to developer funding) can be agreed towards identifying other ways to plausibly and reasonably address the problems within the Plan period.</p> <p>In this respect and learning from its experience with the Melton Local Plan (and the considerable scale package of transport measures required to enable growth in Melton Mowbray) the CHA consider it is important the Local Plan should embed a coordinated, strategy-led approach, both through a core narrative about the journey up to and beyond the Local Plan's adoption and in respect of robust policies linking growth to strategy development and delivery.</p> <p>The Infrastructure Schedule is derived from transport evidence work undertaken to inform the Local Plan's development and does contain measures which provide a platform for moving forward. But, at as it stands at present the measures are not drawn together in any coordinated, strategy-led way. It also noted that they have a cost running to several hundreds of millions of pounds, including Strategic Transport Projects.</p> <p>In its overall comments on the draft Plan, the CHA references ongoing discussion with CBC to agree the details of a continuing work programme. The CHA expects that such a work programme is predicated on developing a more strategy-led and coordinated approach to the further development and delivery of the package of highways and transportation measures that are required to facilitate the Plan's successful delivery. The CHA also anticipates that the outcomes of the work programme available by the time of the Plan's Examination in Public are likely to necessitate discussions about possible changes to the Plan's narrative text and policies to reflect the evolved and evolving situation and to ensure that the Plan provides as strong a policy platform as possible for seeking to secure the required highways and transport investment.</p>
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<p>Policy INF1: Infrastructure and Developer Contributions</p>	<p>It is the CHA’s view that as currently drafted, this policy is rather too generic and, in line with comments elsewhere, does little really to embed in the Plan the coordinated, strategy-led approach that is required to supporting/ enabling further growth in the Borough.</p> <p>There is a large introduction relating to infrastructure but from a county context, only education is referred to. The delivery of new or enhanced library provision or the securing of S106 agreements to mitigate the impact of a development on libraries is not mentioned. Waste is also not mentioned at all. The policy needs expanding to do so. It states that significant expansion to local</p>
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	<p>schools and the provision of new schools will be required and this will be achieved through individual contributions. There is concerns for the County that not all developments may deliver the necessary level of contributions especially if the applicants go down the viability route. Viability is mentioned – It states that the plan itself is tested to see if its viable and that developers should provide full details to allow the Council to assess viability if this relates to individual planning applications. It is important to protect the position of the County that the plan is properly viability tested at a strategic level to ensure that all of the infrastructure that is required as part of the development can be delivered otherwise its delivery will fall to the County Council.</p> <p>There is also no mention of contributions to infrastructure that promotes healthy lifestyles, so primary prevention and wider determinants of health, only health services. A link could be made to Policies EV9 and EV10 to overtly link activity to health, and a HIA could help with placing these facilities around accessibility for those experiencing most inequality. <i>Revised text is suggested for the broadband section on Page 194:</i></p> <p>Full-fibre broadband is a critically important infrastructure now commonly referred to as the ‘fourth utility’ alongside electricity, gas and water supply. We want Charnwood to be a well-connected borough in order to reduce the need to travel, support higher levels of home working and inward investment and improve economic competitiveness. Leicestershire County Council is committed to working towards universal coverage of gigabit capable broadband infrastructure for all homes and businesses in Leicestershire, with the ‘Superfast Leicestershire’ focussed on areas not served by commercial operators. The Council supports a principle policy objective of promoting high quality digital infrastructure to all new build developments.</p>
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FAO Linda Walker
Planning Team
Charnwood Borough Council
Southfield Road
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LE11 2TN

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w: www.trentriverstrust.org

27th September 2023

Reference: P/23/1517/2 (Land off Laburnum Way Loughborough LE11 2FB)

Dear Linda,

I write with reference to the documents submitted to support application for housing at land off Laburnam Way, Loughborough.

As you will be aware, the site lies upstream of Loughborough, and is located within the surface water catchment area of the Moat Brook. There is existing flood risk within Loughborough, so it is important that all changes to land use and development upstream on the Moat Brook are undertaken to slow and store water, to delay and reduce the flood peak flowing downstream.

Trent Rivers Trust (TRT) is responding to this planning application, as we are working in the area, as part of a wider strategic project to reduce flood risk to specific communities. In particular, we are working with other farmers in the Moat Brook to develop land use and land management solutions that deliver 'natural flood management'. As part of this strategic project, we seek to influence all other types of land use, including the built environment.

Housing development has the opportunity to utilise Sustainable Urban Drainage (SUDS) techniques, to store and hold back flood water. In this case, at TRT, we are looking to promote best practice and latest thinking in the design of SUDS.

Water benefits of SUDS

TRT would urge the use of swales and surface water features to convey water across the site, before it reaches the balancing areas at the downstream end. Swales are an important component of a good practice SUDS scheme as they allow percolation and evaporation of water, reducing volumes flowing downstream, as well as creating habitat. An underground network allows for none of these benefits and is more expensive to build.

Storage areas

The proposed surface water management is shown on page 48 of the Design and Access Statement Part 2, titled 'Blue Infrastructure Strategy'. TRT welcomes the use of several detention and attenuation basins to store surface water run-off. The features proposed for location 01 and 02 are particularly important, as they have the potential to store and delay surface water flood water flowing in the Moat Brook from the upstream catchment area. It would be beneficial to design these with gradual bank profiles and to include other features to increase their attractiveness for wildlife and people. TRT would prefer to see less use of concrete outfall structures and steep banks on these features wherever possible.

Drainage routes

In terms of surface water conveyance, there are some attractive images of blue green infrastructure, that depict the type of development described in the text. The use of the images suggests that swales will be used to direct run-off from landscape areas toward existing field ditches, delivering up-stream

attenuation. However, on Figure 10 on page 49 in the same document, no swales are shown on the plan. The reference '08' on the same plan suggests that a below ground piped network will be used to direct run-off from the developed areas and the highways. Detail of what is actually proposed in terms of surface water conveyance is shown in another document, on Figure 8 in the FRA. This includes plans for two short lengths of swale. This length of swale is far shorter than could be possible on the site.

TRT is of the view that the plans for surface water conveyance across the site do not demonstrate best practice. TRT would suggest that surface water drainage should be directed above ground through longer swales, with minimal use of an underground pipe network.

It is unclear what the proposal is for the existing drainage routes across the site, in particular streams A, B and C (shown in dwg no. E853-FRA-01). Ideally these watercourses should remain intact, and be enhanced, ideally using methods described in the river restoration section below.

River restoration

TRT would suggest that there is scope to add features into the main drainage route (to the right of location 01), to slow and delay flood peaks, as well as provide features of habitat interest. The figure at the end of this letter includes a red line around the key drainage route through the site, where river restoration measures would be particularly beneficial to protect Loughborough downstream. TRT would suggest a two-stage channel is created, with habitat features as well as additional capacity for flood storage. An example of a case study from a slightly similar scheme is available on this [link](#). This approach would be preferable on all drainage routes across the development.

TRT would be available to advise on the design of a restoration scheme for this channel, if that would be of use.

Property level flood resilience

TRT would suggest that box planters are included within each property, where possible, to intercept roof water coming through down pipes. More details are available on this [link](#). These features store small volumes of surface water drainage, encourage gardening and provide an excellent engagement tool for local communities and residents about the importance of sustainable management of surface water.

Additional Information

TRT has already met with the Bloor Homes, some of their representatives and Michel Hopkins from Charnwood BC Planning Department to discuss the design principle for the whole of this site in August 2023. TRT would welcome further opportunities to discuss the detail of this site.

Please feel free to contact me to discuss any aspect of these comments.

Yours Faithfully



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Trent Rivers Trust



FIGURE 10: PROPOSED BLUE INFRASTRUCTURE ELEMENTS