

Woodthorpe Residents Association
Woodthorpe Hamlet

Charnwood Borough Council
Development Management
Loughborough
Leicestershire
LE11 2TN

7th November 2023

For the attention of Ian Kemp, Programme Officer

Dear Sir,

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

The following is the response from the Woodthorpe Residents Association (WRA) derived from an email from Charnwood Borough Council (CBC) dated 27 September 2023 advising of further updated documents which are available for review and comment.

We do so in support of the considerations addressed by an adjoining local resident's association, namely the Haddon Way Residents Association (HWRA).

The comments are in relation to the proposed allocations at HA15, HA16, HA17 and HA19 as these will have the most impact on combined 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 WRA and 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 Woodthorpe and 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 Woodthorpe, 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.

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 CCS 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 Quenborough – 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. Requesting 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, HA16, HA17 and HA19 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 Woodthorpe, together with 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 Woodthorpe and 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 Woodthorpe and 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 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 Woodthorpe roundabout in the Transport Strategies (other than the RPS report [08 Oct 2012] suggestion from the appended document application P/21/0550/2).

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

Recommendations in respect of the Woodthorpe Roundabout

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

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 particularly 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.

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.

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, HA15, and HA17.

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,

David Sangwine

Secretary to the Woodthorpe Residents Association

WRA Charnwood Local Plan 2021 Exam docs response. DWS Woodthorpe Nov 2023

Item of further comment on recent matters of interest associated with the Draft Local Plan 2021-2037:

Dear Sirs

The WRA is the local Residents Association which represents the residents of the hamlet of Woodthorpe. 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
- and is 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.

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 WRA appreciates 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.

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: *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 local experience on the 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 limited in width 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 Main Street, which goes into the hamlet of Woodthorpe as an access to HA 15 development is totally impractical. This is an already problematic roundabout and a separate access to Terry Yardley Way is required as is evidenced in the RPS study for P/21/0550/2.

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 Domesday 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 and environmental/biodiversity issues

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.

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.

Remove housing and access proposal for site HA15 from Main Street and provide a 'local area of separation' to adequately protect Woodthorpe.

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 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. *Therefore, 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.

Yours Faithfully,

David Sangwine

Secretary to the Woodthorpe Residents Association